



Havering
LONDON BOROUGH

Daniel Douglas
Team Leader Transport Planning
Planning
London Borough of Havering
Mercury House
Mercury Gardens
Romford
RM1 3SL

Mr Richard Allen
Lead Member of the Examining Authority

[REDACTED]
[REDACTED]
[REDACTED]
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Dear Sir,

London Borough of Havering (20025659) – Responses to Written Representations

Thank you for the opportunity to respond to Written Representations made at Deadline 2. LB Havering would like to offer the following comments.

Anthony Manley REP2-023 and Nikki Francini Lacovou REP2-035

LB Havering notes the comments that have been raised concerning the impact on local residents when there is an incident on the A12 slip road or Brook Street roundabout.

LB Havering has commented on this matter when responding to Relevant Representations at Deadline One (REP1-034) and within its own Written Representation at Deadline 2 (REP2-022).

LB Havering shares the concerns expressed with regards to the impact road works and incidents that occur on the A12 Eastbound off-slip at Junction 28 have for local residents.

It remains the view of LB Havering that full night time closures of the A12 eastbound off-slip are unacceptable and the Applicant must explore how such closures can be avoided. This matter cannot wait until the CEMP and associated Traffic Management Plan is produced by the appointed contractor and should be resolved as part of the Examination.

With regards to the reference to a proposed right turn when exiting Woodstock Avenue, LB Havering would again encourage the ExA to consider that this matter be explored further through feasibility work by the Applicant.

Transport for London (TfL) Written Representation (REP2-036)

LB Havering agrees with Transport for London's assertion (Paragraph 2.2 *approvals and consultation*) that the outline Traffic Management Plan should form part of the application document and it should be considered as part the Examination.

As LB Havering has previously stated in its own Relevant Representation (REP1-031), Requirement 10 of the DCO sets out that the Traffic Management Plan will be approved by the Secretary of State following consultation with relevant highway authorities. This does

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not give the assurance the Council requires that Havering's concerns will be taken into account by the appointed contractor.

LB Havering supports TfL's comment in Paragraph 4.2 that they should have a substantive role in informing the construction programme and agreeing traffic management arrangements during the construction period. LB Havering considers that this should be extended to all relevant Highways and Planning Authorities involved in the scheme.

LB Havering shares TfL's view that Requirement 3 of the draft DCO should be amended to include "highways authorities". This will ensure that Transport for London and Essex County Council as well as the Local Planning Authorities (LB Havering and Brentwood BC) are included in any consultation.

LB Havering notes the comments raised by TfL in paragraphs 5.10 and 5.11 concerning construction timescales. A potential overlap of construction between the M25/J28 and Lower Thames Crossing schemes remains a concern for LB Havering, and the associated cumulative impacts of this on the network. It further emphasises the need for all relevant Highways Authorities to be involved in the development of the Traffic Management Plan as it is developed by the appointed contractors, and the need to discuss with the appointed contractor schemes that are to be delivered within the area.

LBH supports TfL's position that safe crossings are required of the A12 and M25 Slip roads at the Brook Street roundabout for safe passage of pedestrians and cyclists from the A12 east bound off-slip to Brook Street. LB Havering has commented on this matter in section 17.5 of the Local Impact Report (REP1-022) and agrees that there is a need to provide suitable crossing facilities for pedestrians and cyclists when navigating this junction.

LB Havering agrees that the Book of Reference that was submitted by the applicant (AS-010) needs to be updated to reflect the agreed position as TfL have stated in paragraph 6.5 of their Representation. It is the case that LBH has agreed with the position TfL have set out to the Applicant with regards to who the responsible Highways Authority is for specific plots of land. LB Havering notes that the Applicant intends to submit an updated Book of Reference at Deadline 3a, and this is welcome.

LB Havering shares the concerns set out by TfL in paragraph 7.6 with regards to the ability of large construction vehicles being able to "u-turn" at the A12 junction with Petersfield Avenue to travel eastbound along the A12 towards the construction site. LB Havering raised similar concerns in its response to the Transport Assessment Supplementary Information Report (TASIR) submitted at Deadline One (REP1-033) and again requests that the Applicant provide tracking data to provide the necessary assurances to stakeholders.

LB Havering notes the comments provided by TfL in paragraphs 7.7 to 7.10 concerning Woodstock Avenue. The representation by Transport for London refers to the journey time savings set out in tables 5-4 and 5-7 of the Transport Assessment Supplementary Information Report (PDB-003), and describes this being of benefit to residents of Woodstock Avenue post scheme completion.

Whilst these journey time savings appear very favourable, Havering stated in its own response to that report (REP1-034) that the Council has concerns with regards to the forecast growth information that the Applicant has used which would impact on the output model data shown in those tables.

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To that end, LB Havering welcomes TfL's comment in paragraph 7.11 that further detail from the Applicant is required to better understand how local planning policy has been included within the "High Growth" scenario set out in the Transport Assessment Supplementary Information Report.

Savills UK Ltd on behalf of Gardens of Peace Muslim Cemetery (REP2-029)

LB Havering notes in the Executive Summary that a loss of up to 512 burial plots could occur as a result of the Cadent gas pipe line diversion that is required and any subsequent sterilisation of land.

LB Havering has stated in its own Written Representation (REP2-022) that the implications for the Gardens of Peace Cemetery as a result of construction works, should be explored further by the ExA so that they can be better understood by all parties.

Whilst LB Havering is very concerned that there could be a loss of burial plots at the Gardens of Peace Cemetery, it should be noted that LB Havering currently has capacity to accommodate Muslim burials within Council owned Cemeteries.

The Council no longer considers the scheme to be non-compliant with Local Development Framework DC31 *Cemeteries and Crematoria* and Local Plan Policy 16 *Social Infrastructure* as was set out in section 10.13 of its Local Impact Report (REP1-031), because of existing capacity for Muslim burials that is currently available.

The Council does however acknowledge that the Gardens of Peace Cemetery has been developed specifically for Muslim burials, and that practising Muslims may wish to be buried in a Cemetery specific for the Muslim community, as opposed to other Cemeteries located within Havering. It is also recognised that the Gardens of Peace Cemetery will encompass burials from a broader catchment area and will not be limited to the borough of Havering.

This is why the Council considers it important that the current uncertainty around the extent to which the Gardens of Peace Cemetery will be impacted by the scheme should be clarified by the ExA.

Woodland Trust

LB Havering notes the comments from the Woodland Trust and the concern expressed in respect of the potential impacts of construction on veteran trees. LB Havering has agreed with the applicant that there is an unavoidable loss of two veteran trees. LB Havering has further agreed with the Applicant that their proposals to replace this loss with 16 trees of suitable native species is appropriate mitigation for that loss.

LB Havering notes that the Woodland Trust believe that The Grove is an area of woodland that contains ancient woodland indicator species such as Bluebell and Dog's Mercury. LB Havering further notes in ES Chapter 7 Biodiversity (APP-029) that The Grove is described as a Priority Habitat Semi-natural broadleaved woodland (APP-029). There is no reference however to The Grove being Ancient Woodland.

LB Havering would invite the ExA to consider seeking clarification from the Applicant as to whether The Grove being considered Ancient Woodland will affect the mitigation measures that are required for this area.

Yours faithfully,



Daniel Douglas
Team Leader Transport Planning