



Havering
LONDON BOROUGH

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Dear Sir,

London Borough of Havering (20035775) – Written Representation Lower Thames Crossing Scheme

Please find below a summary of LB Havering's Written Representation, also submitted at Deadline 1.

London Borough of Havering Scheme Position

The Council supports the Lower Thames Crossing (LTC) Project in principle and the benefits a new river connection will bring to residents and businesses. LB Havering remains concerned about a number of aspects of the proposal and the adverse impact the scheme will have on traffic and the environment.

LB Havering's main concerns are set out in the Principal Areas of Disagreement (PADS) document, an update of which has been submitted at Deadline 1.

Policy Compliance with NPSNN

LB Havering remains concerned that the project does not comply with a number of policies set out in the National Policy Statement National Networks (NPSNN).

In respect of the wider network impact, LB Havering is of the view that the scheme does not comply with the policy paragraphs of the NPSNN: 3.2, 4.3, 4.4, 4.15, 4.64, 4.66, 5.202, 5.205, 5.206 and 5.216.

LB Havering is of the view that, with regards to mitigation for the scheme, the project simply identifies the potential impacts requiring mitigation, but this mitigation is not properly secured. LB Havering believes this is contrary to paragraph 4.64, 4.66, 5.202, 5.206 and 5.216 of the NPSNN.

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Road User Charging Strategy

LB Havering supports the need for a charge for using the LTC and that the charge should be consistent across multiple river crossings to avoid pressure on one particular part of the network.

LB Havering is of the view, however, that the rationale put forward by National Highways (NH) for why a charging regime is being proposed does not comply with paragraphs 3.23 and 3.25 of the NPSNN. This NPS makes it clear that toll charges are to be used for funding river and estuary crossings, however paragraph 1.4.2 of the Road User Charging Statement suggests that the charge is being applied as a traffic management measure.

Local Resident Discount Scheme (LRDS)

LB Havering is of the view that Havering residents should receive a LRDS as Havering is a host Local Authority for the project. The Road User Charging Statement states that the LRDS will be applicable to council tax payers in the authorities where the tunnel portals are located and that this provides a consistent approach to that taken at the Dartford Crossing, where the Dart-Charge discount is also available to residents in Dartford and Thurrock. However, LB Havering would suggest that the key difference between the two projects is that the LTC project is much wider in scope, with the project reaching as far as north of the M25 Junction 29 and also the A2/M2 in Kent to the south.

Upminster Cemetery (UC) and South Essex Crematorium (SEC)

The Council is concerned about the impact the closure of Ockendon Road will have on UC and the SEC. As it stands, Ockendon Road is due to close for up to 19 months and there is concern about the socio-economic impact this will have on both facilities and the Council's ability to maintain a viable essential public service. The number of burials and cremations from east or north east of Havering means that the Council could lose up to £1.4 million over a two-year period. LB Havering is concerned that it will be unable to maintain this vital essential public service.

In addition to the financial cost, the Council is concerned about the reputational damage the closure could have on the UC and SEC, with funeral directors advising families to go elsewhere, which could have a long-term legacy impact. The closure has the potential to affect other facilities in the area, in particular local Public Houses, which can host up to three wakes a day.

Impacts during Construction

The Council is concerned with regards to the impact that the construction of the scheme will have on the local road network and other road users. In summary this includes:

- The suitability of diversions routes.
- The suitability of construction traffic routes.
- Access to construction compounds.
- The implications for reassignment of traffic on Havering's local highway network.
- The length of time traffic management will be in place on the local highway network.
- The specification for, coherency and consistency of Public Rights of Way (PRoW) provision.

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- The safety of PRoW users on new sections of footpath and bridleway where they interact with LB Havering's network.

Public Transport Impacts

LB Havering is concerned that construction works will impact on several bus routes in the borough, most notably: the 347 Romford to Ockendon services; and the 370 Romford to Lakeside service; the 347 Upminster to Cranham service and the 646 school service operating between Noak Hill and Cranham.

Non-Motorised User (NMU) Benefits

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.

The Council welcomes the proposed NMU crossing over the A127 that will connect Moor Lane and Folkes Lane, however concerns remain over the quality of the linkages to that crossing point that are currently considered unsuitable for NMU's. The Council is working with NH on securing a dedicated NMU path to link the A127 with Folkes Lane Woodland, but is of the view that such a connection should be secured through the project itself rather than designated funds.

The Council continues to have concerns that NH are proposing a section of the diverted footpath 252 that will need to be maintained by LB Havering. The Council does not have the financial capacity to pick up additional assets, particularly those that are being delivered by third party organisations. This matter will continue to be discussed with NH in the hope that a resolution can be found.

The Council has concerns that several Public Rights of Way (PRoW) will be impacted by the construction of the scheme. Further details can be found in paragraphs 10.1.1 to 10.1.15 of Havering's Local Impact Report (LIR).

Concerns regarding the Applicant's Transport Assessment

The Council has concerns about omissions and errata contained in the Applicant's Transport Assessment (TA), titled *Lower Thames Crossing, 7.9 Transport Assessment, Volume 7, Version 1.0*, dated October 2022 [APP-529].

The Council is concerned about the lack of detail provided in the TA to establish the transport baseline sufficiently.

It is the Council's view that the Applicant's TA does not adequately establish the transport baseline for the surrounding local highway network, particularly in relation to potential construction impacts.

Wider Network Impacts

The Council is disappointed with the Wider Network Monitoring and Management Plan (WNMMP), which lacks the detail necessary to provide Havering with the surety it needs that impacts on the wider road network will be adequately addressed.

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The WNMMP provides no mechanism for funding any identified mitigation measures in Havering, with the funding sources listed in Table 6.2 of the WNMMP, in the most part, not being applicable to Havering because of the devolved transport responsibilities from Central Government to the Mayor of London.

The WNMMP appears to pass responsibility for addressing any wider network impacts identified onto the respective Local Authority. The Council is of the view that the WNMMP needs to be redrafted to address these concerns.

The Council has concerns over the impact the LTC scheme, once operational, will have on a number of junctions within Havering, in particular those that border the A127. The Council, in conjunction with Transport for London (TfL), has commissioned local junction modelling to assess the validity of the local junction modelling work undertaken by NH. The Council is seeking a clear commitment from NH to work with both LB Havering and TfL to secure appropriate and funded mitigation for all users of junctions in the borough that will be adversely impacted by the scheme.

Mitigation

The Council considers it unacceptable that NH cite the national need for the scheme as the basis for not providing effective mitigation for scheme impacts.

LB Havering would like to see a comprehensive package of mitigation provided and secured through the Development Consent Order (DCO). Further details on LB Havering's mitigation requests are detailed in Chapter 11 Mitigation Measures, paragraph 13.1.1 and Table 18 of the LIR.

Draft DCO (dDCO)

The Council has raised a number of concerns in relation to the Clauses and Requirements set out within the dDCO. These concerns relate to the language used in various Requirements, Deemed Consent and Projected Provisions. Further details on these can be found in a separate submission at Deadline 1.

Section 106 (S106)

The S106 Heads of Terms document does not give the Council surety that the Applicant can satisfactorily manage the impacts of the scheme. It offers very little, if any, recompense to Havering residents for the disruption during the lengthy construction phase. The Council has previously engaged with NH on potential S106 matters and has also submitted a list of "asks". Despite assurances that such "asks" would be looked into, LB Havering has received no formal S106 offer to consider.

Further details on LB Havering's S106 asks can be found in Chapter 14 paragraphs 14.1 to 14.1.2 and Table 18 of the LIR.

Production of Documentation following DCO being Granted

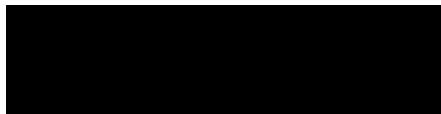
The Council is very concerned that critical documents such as the Traffic Management Plan, the Environmental Management Plan and the Code of Construction Practice will only be produced by the appointed contractor post consent being granted for the DCO. LB Havering is concerned that, despite being a consultee for drafts of final management

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plans, once the scheme receives consent the Council will have little influence with any changes that Havering may want to see made to such documents.

Thank you for the opportunity to submit a summary of LB Havering's Written Representation. LB Havering is happy to assist the ExA as the Examination progresses.

Yours faithfully,



Daniel Douglas
Team Leader Transport Planning