



Havering
LONDON BOROUGH

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London Borough of Havering (20035775) – Response to Written Representations and Local Impact Reports

Dear Sir,

Thank you for the opportunity to comment on Written Representations from Interested Parties, and Local Impact Reports from host Local Authorities.

LB Havering would like to offer the following comments, which are set out below in alphabetical order. It is noted that bracketed references refer to the relevant Written Submission document, principally a Written Representation (WR) or a Local Impact Report (LIR).

Brentwood Borough Council (BBC) WR (REP1-219)

LB Havering shares BBC's concerns that an appropriate monitoring regime is not proposed for when the scheme is operational, which would identify impacts that were either unforeseen or not accounted for in the methodology of the Lower Thames Area Model (LTAM) (5.1).

Brentwood Borough Council LIR (REP1-220)

LB Havering shares one of BBC's key concerns in relation to the potential wider network impacts of the scheme once in operation, as well as the ability for the scheme's impacts to be monitored and managed appropriately (8.3). The requirement for an appropriate monitoring regime is also shared (8.3), as also cited in BBC's WR.

Essex County Council (ECC) LIR (REP1-226)

LB Havering supports ECC's view that further information is required on the impacts of the proposed Lower Thames Crossing (LTC) scheme and that, fundamentally, some material changes to the proposals are required, which should be secured through the Development Consent Order (DCO) (p.4).

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LB Havering shares ECC's concerns that the traffic modelling has highlighted numerous junctions experiencing negative capacity and flow impacts, the locations of which are beyond the immediate vicinity of the scheme (p.13, 3).

LB Havering notes that ECC has also requested mitigation by National Highways (NH), the Applicant, to address the negative traffic impacts identified on the wider road network. LB Havering notes that ECC is seeking accelerated funding and delivery of these mitigations (p.13, 4).

LB Havering agrees with ECC that a clear understanding with NH is needed about how the required mitigation will be determined and secured (p.13, 4). LB Havering fully supports ECC's view that a robust monitoring plan, with input from affected stakeholders, should be a requirement of the DCO for the scheme (p.13, 12).

LB Havering supports ECC's views with respect to archaeological mitigation (p.27). LB Havering shares ECC's view that the role of local authority archaeologists for monitoring and signing off the mitigation needs to be appropriately acknowledged and clearly and consistently defined as part of the wider response.

LB Havering supports ECC's request for further assurances on how the Skills, Education and Employment (SEE) Strategy will be monitored and the process for reporting on progress against the objectives set within the SEE Strategy (p.47).

Port of London Authority (PLA) WR (REP1-269)

LB Havering supports the PLA's view that greater use should be made by the Applicant of transport of both materials and people (i.e., construction workers) by water during the construction of the proposed scheme (6.1, 6.6).

LB Havering shares the PLA's concerns with respect to the validity of survey data used to support the assessments in the Environmental Statement (ES), given the two-year delay in construction. This is a particular concern for the PLA, as well as LB Havering, as there is no commitment in the Register of Environmental Actions and Commitments (REAC) or the ES to update the surveys to take account of any delays (22.28).

Thames Crossing Action Group (TCAG) WR (REP1-425)

LB Havering notes the concerns raised by TCAG concerning the potential for flooding in North Ockendon. The Council has provided comments on the scheme from a flooding and drainage perspective in section 6.6 of Havering's LIR. LB Havering has, in particular, commented on the assessment process with regards to surface water flooding where further information is required from the Applicant to better understand how such impacts will be mitigated.

The Council welcomes the reference to Havering wishing to be included in the Local Resident Discount Scheme.

Thurrock Council (TC) LIR (REP1-281)

It is noted that TC set out a number of concerns in relation to traffic modelling, including the lack of assessment of the Local Road Network (LRN) (TC has requested

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microsimulation modelling of local junctions); the absence of LTAM sensitivity tests and scenarios (inconsistent with the Department for Transport's 2021 Uncertainty Toolkit); and the use of unrepresentative baseline traffic data (Table 6.2, Table 7.1 and 7.8.2 – 7.8.31).

LB Havering shares TC's concern that the Applicant has relied solely on the LTAM strategic model to inform the operational impacts of the LTC scheme and that, whilst it is better suited to informing scheme appraisal, it is an inadequate tool to inform and understand the impacts on local junctions, links and communities during construction and operation (9.4.1).

LB Havering supports TC's advocacy for adopting a hierarchical approach to modelling, which includes a suite of operation models of the LRN (9.4.5).

LB Havering agrees with TC's position that it is not acceptable for severe transport effects on the LRN not to have mitigation secured through the DCO (9.5.2).

LB Havering agrees with TC's position that it is NH's duty, as Applicant, to mitigate the effects of the LTC scheme on local roads (9.5.5, 9.5.11).

LB Havering shares TC's concerns in relation to the suite of Control Documents, in which there is limited clarity and few commitments, so they do not provide the certainty that the scheme construction will be managed within the construction parameters defined within the DCO assessment (9.8.4).

LB Havering agrees with TC's view that NH, as Applicant, should be leading with a strong framework from which the contractors can refine their proposals (9.8.8).

LB Havering notes that, with respect to proposed walkers, cyclists and horse riders (WCH) scheme infrastructure, TC as local highway authority has sought to obtain more details from NH regarding future design and maintenance, as well as future liabilities (with no further details provided up to Deadline 1 or D1) (10.12.11). LB Havering shares this concern.

NH have indicated to the Council that the section of footpath 252 that goes over the Essex Thameside line would come under Havering's responsibility once in place. It is also stated in Article 10 of the draft DCO (dDCO).

Whilst it can be considered reasonable for the Local Highway Authority to maintain the footpath surface itself, maintenance of the bridge structure is considered unreasonable. At a time when local authority maintenance budgets are under severe pressure, the Council does not consider maintenance of the structure acceptable. The structure over the railway would be built for NH's convenience and, as such, the Council believes it should be maintained by NH.

With respect to the SEE Strategy, LB Havering shares TC's view on the need for more extensive local targeting (13.4.14). LB Havering acknowledges TC's identification of Havering as one of the most directly affected local authorities in relation to the scheme (13.4.14a).

LB Havering shares TC's concerns in relation to the Wider Networks Impacts Management and Monitoring Plan (WNIMMP) [APP-545], which fails to address the requirement to secure mitigation of LTC's impacts through the DCO (15.5.11).

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Transport for London (TfL) WR (REP1-304)

LB Havering shares TfL's principal concern that the WNIMMP fails to set out any credible mechanism for mitigating adverse impacts on both local and strategic road networks identified through monitoring during scheme operation (3.2).

LB Havering shares TfL's concern that it is entirely unacceptable that NH, as Applicant, will only provide data to support other local highway authorities bidding for funds to mitigate the adverse impacts caused by the Applicant's project (3.2).

LB Havering fully endorses TfL's suggested approach to delivering mitigation based on the precedented approach adopted in the Silvertown Tunnel DCO (3.5). Like TfL, LB Havering considers this appropriate, reasonable and proportionate (3.10).

LB Havering shares TfL's concerns in relation to the potential for traffic diverting from the strategic road network onto the local road network in north-east London (3.7).

LB Havering fully agrees with TfL's view that managing uncertainty with regard to the LTC scheme's detailed traffic impacts in local areas, as well as across the wider road network, should primarily be the responsibility of the Applicant, working with local planning authorities and highway authorities on any required mitigation (3.8, 3.17).

LB Havering notes TfL's concerns in relation to the LTAM scheme assessment and agrees that the lack of granularity severely undermines confidence in the ability of this model to serve as the exclusive basis for determining the need for mitigation of operational traffic, air quality and noise impacts (3.20).

LB Havering welcomes and fully supports TfL's view that, *"a more robust strategic modelling approach supported by a detailed micro-simulation modelling for the most affected junctions and corridors in the London Borough of Havering is essential to gain a robust understanding of the impacts of the Project and to determine whether there is a need for any mitigation"* (3.22).

LB Havering welcomes TfL's consideration of the local junction assessment work undertaken by TfL and Havering (3.23 – 3.29). LB Havering shares TfL's particular concern in relation to the operational impacts on three identified junctions in the Borough and the need for mitigation.

LB Havering supports TfL's request for air quality and noise monitoring on the A127 west of M25 Junction 29 to be included in the scope of the WNIMMP and the REAC (3.32, 3.40).

LB Havering shares TfL's outstanding concerns in relation to the design, construction and maintenance of the proposed new WCH bridge on the A127 west of M25 Junction 29 (4.4).

LB Havering notes that TfL is seeking a commuted sum from the Applicant in relation to the additional expense it will incur in managing and maintaining this proposed new WCH bridge (4.1), noting in its WR that TfL and London Boroughs do not receive funding streams from the Department for Transport (DfT) for the maintenance of their local highways (4.12).

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LB Havering strongly supports TfL's request that the precedent from the M25 Junction 28 Improvements DCO is followed, where the Secretary of State (SoS) included protective provisions for TfL (in this instance) that the Applicant must pay TfL's costs and a commuted sum (4.14).

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.

Upminster and Cranham Residents Association (UCRA) WR (REP1-429)

The Council notes the WR submitted by the UCRA. Havering welcomes the request for appropriate mitigation to offset the impacts of the scheme.

The Council supports the request for a new crossing point to be installed on Front Lane. Construction Modelling shows that during certain phases of construction there will be a significant increase in vehicles (PCUs) heading northbound on Front Lane in the PM peak, including an increase of up to 150 PCUs in phase 2. Further details can be found in Table 5 and paragraphs 7.2.10 of Havering's LIR (REP1-249).

Delivery of a new crossing point in Front Lane will improve safety for pupils walking to nearby schools, in particular Engayne School. The Council has cited the need for fixed crossing points to be installed close to schools that will be impacted by construction works in Table 18 of its LIR.

LB Havering agrees with UCRA's concerns about the Ockendon Road closure period. In particular, a reduction in the timeframe for the road closure is critical to minimise the impact on the wider community. Whilst it is recognised in the Applicant's updated oTMPfC (REP1-174) that the closure of Ockendon Road has been reduced from 19 months to ten months, the Council still considers this too long. Further information on the wider community impact a closure of Ockendon Road will have can be found sections 8 and 9 of Havering's LIR.

LB Havering notes the concerns regarding the location of the M25 Construction Compound. Whilst the compound has been relocated at the Council's request from its original site to minimise the impact on North Ockendon Pit SINC, LB Havering remain concerned about the impact the compound will have for the quality of life for local residents and is seeking suitable mitigation measures to offset such impacts. Further details can be found in Table 18 of the Council's LIR.

LB Havering notes the concerns regarding the loss of ancient and other woodland as part of the scheme. LB Havering is aware mitigation planting is being delivered as part of replacement Open Space land being delivered at Thames Chase Forest as part of the scheme. Policy 18 *Open Space, Sports and recreation* of the Havering Local Plan states that replacement open space will only be supported if it can demonstrated that replacement provision of equivalent or better quality and quantity will be made at a suitable location. The Council expects to work with the appointed contractor as detailed designs for this replacement Open Space are progressed.

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Woodland Trust WR (REP1-306)

The Council notes the concerns raised by the Woodland Trust concerning the impact the scheme will have on Ancient Woodland and Veteran Trees in Havering.

Whilst LB Havering has indicated in its LIR that it is satisfied with the majority of the mitigation planting proposed to reduce the impact of the scheme, concerns around the design, implementation and management of this planting remain.

Other Interested Parties Written Representations

The Council notes that there are a number of Written Representations that have been submitted by Individual Members of the public, including some from Havering residents. The Council notes the contents of these submissions.

Yours faithfully,



Daniel Douglas

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