



Havering
LONDON BOROUGH

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Date 19th September 2023

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London Borough of Havering (20035775) – Written summary of oral comments made at Issue Specific Hearings 3, 4 and 6.

Dear Sir,

Thank you for the opportunity to submit a written summary of the oral comments LB Havering delivered at Issue Specific Hearings 3, 4, and 6.

Written summary of oral comments made at Issue Specific Hearing 3

M25/LTC Intersection

- Review of Function and Traffic Movements

As has been stated in LB Havering's Written Representation (WR) (REP1-253) and Local Impact Report (LIR) (REP1-249), the Council supports the project in principle; however, the Council continues to have a number of concerns around the impacts the project will have on the local area.

The Council continues to have concerns about the impact the closure of Ockendon Road will have on the local area. The Council continues to be concerned that this will have a significant impact on Upminster Cemetery and South Essex Crematorium (SEC), which is located just to the west of where the new Lower Thames Crossing (LTC) road is going to be located.

The Council has previously stated in its LIR (REP1-249) that it is the eight busiest crematorium in the Country and there are 3,000 cremations annually there.

In order to accommodate the scheme, Ockendon Road will be fully closed for a maximum of 10 months. Whilst Havering welcomes the reduction in the closure period from 19 months, it is still considered too long.

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Furthermore around 17% of cremations at the SEC come from the north-east or east of the site and are likely to use Ockendon Road to access the Crematorium. Further information can be found in Section 9 of Havering's LIR. The Council is concerned that the closure of Ockendon Road will impact on its ability to perform its statutory function in terms of operating the Crematorium over that period. Additionally, there is concern around the emotional impacts and additional stress the closure will have on grieving families, whether visiting graves of loved ones or attending funerals and cremations.

The Council is continuing to engage with the Applicant about this matter and will be having a meeting with the appointed Contractor for the northern section of the project to discuss it further in the coming weeks.

Whilst the Council is content that there is an overall net gain in replacement Open Space provision and welcomes the replacement land proposed for Thames Chase Forest, there is concern around the accessibility of the Open Space planned for Hole Farm in the Borough of Brentwood, from Havering.

Havering's Local Plan Policy 18 Open Space and Recreation states that where Open Space is to be lost, it has to be replaced at an equivalent or better standard. Havering is concerned that the area of Open Space at Hole Farm will be challenging to access for Havering residents, so will not be of an equivalent standard.

The Council has raised similar concerns to other host authorities around local traffic modelling. The Council had similar concerns around the impact the scheme would have on the local road network, particularly junctions along the A127 in Havering.

The Applicant carried out local junction modelling at Havering's and Transport for London's (TfL) request, but Havering continued to have concerns about the way in which the modelling was carried out, specifically that the flows put into the model had been taken directly from the LTAM Strategic model. Havering and TfL commissioned its own local modelling work (REP1-247) which identifies junctions which are likely to be significantly affected during the operational phase.

- Structure and Design Mitigations

The Council supports Kent County Council's view on commuted sums for assets. Havering has a similar situation with a section of footpath 252 as it goes over the Essex Thameside line. The Council simply is not in a position financially to pick up additional maintenance responsibility for that structure. The Council has set out in its submission (REP3-186) why, in terms of maintenance funding, it is at a disadvantage compared to local authorities outside of the GLA Boundary.

The Council shares the view of other local authorities that LTN1/20 Design standards should be used for new walking and cycling bridges.

The Council is fully supportive of the proposed walking, cycling and horse-riding bridge that is proposed over the A127, to the west of the M25. However, currently users would have to use Folkes Lane into order to access the new community forest at Hole Farm in the Borough of Brentwood. The Council is of the view that this road is not suitable for a significant increase in Non-Motorised Users (NMU's).

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The Council remains of the view that a dedicated NMU route should be created to provide the safe and secure access from the A127 Footbridge to Folkes Lane Woodland and, ultimately, across to Hole Farm. The Council is also of the view that such a route should be delivered as part of the project and not through Designated Funds. The Council would suggest that the footbridge is being delivered as a mitigation measure to mitigate the changes to how NMU's navigate the M25/J29, which will be from the northern side as opposed to the southern side of the junction, as is currently the case. This designed-in mitigation prevents the creation of new significant adverse severance impacts and, as such, should be secured as part of the scheme.

The Council is also concerned that the footbridge going over the M25 linking Folkes Lane Woodland and Hole Farm is currently not suitable for use by NMUs. The Council is working with the Applicant regarding the improvements required at this location.

- Action Points

Reflections on the Applicant's Additional Submissions – Visual Representations of Intersections for ISH3

LB Havering notes the visual representations submitted by the Applicant concerning the M25/LTC junction. LB Havering notes many of the local roads that are identified on slide 9 are either proposed roads to be used for construction traffic or as diversion routes. LB Havering has previously set out in its LIR (REP1-249) the Council's concerns around the suitability of some of these roads and put forward potential measures to improve resilience along these routes in Tables 6 and 7 of the LIR.

Written summary of oral comments made at Issue Specific Hearing 4

- Traffic Modelling

LB Havering expressed support for the comments made by Thurrock Council concerning the out-of-date LTAM model being used by the Applicant.

LB Havering raised the point that the 2016 baseline traffic model being used needs to be considered against the Secretary of State for Transport's recent decision to rephase the construction of the project by two years. LB Havering is of the view that this rephasing gives more uncertainty as to when the project is going to be operational.

LB Havering supports the concerns expressed by other local authorities regarding local junction modelling.

The Council sought clarification from the Applicant via the ExA about the latest model runs and indicated that only the model run for CS-67 had been provided to Havering. LB Havering requested details of the changing outputs from CS-67 and CS72.

LB Havering suggested that a Silvertown Tunnel style requirement should be considered to address traffic modelling concerns. Specifically, sub para 4 of that requirement states that before the Silvertown Tunnel is operational the applicant must carry out an updated assessment of the likely impacts of the scheme on the wider road network.

The Council reiterated that it has a number of concerns about scheme compliance with the NPS which are set out in its WR (REP1-253).

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LB Havering suggested that, whilst it is recognised that a balance has to be struck between benefits versus adverse impacts, Havering would suggest that given paragraph 4.64 safety, 5.206 severance and 5.216 accessibility, that the reference to balance is on the assumption that mitigation has been addressed by the Applicant.

- Wider Network Impacts Management and Monitoring

The Mitigation and Monitoring Strategy put forward by TfL provides a clear set of assumptions that local mitigation would be judged against, which included external factors that might not be attributed to the Silvertown Tunnel scheme itself.

The establishment of the Silvertown Tunnel Implementation Group (STIG) formed part of the Silvertown Tunnel requirement. This group went beyond environmental monitoring and focussed on operation with a variety of Members, including a large number of local authorities. LB Havering would like to see a similar group to this introduced for the project as this is focused on operational monitoring and not solely construction.

LB Havering reiterated that funding mechanisms for authorities within London are very different to local authorities outside of the GLA Boundary. As a London Borough, the Council is limited to the funding it receives directly from the Mayor of London who has devolved powers for transport. The proposals set out in the Wider Network Impacts Management and Monitoring Plan (WNIMMP) is effectively asking the five local highway authorities to compete against each other for funding to mitigate wider network impacts. For Havering, if it is unsuccessful in such funding bids, the Havering taxpayer would have to pick up the bill for any mitigation. The Council does not consider this to be the correct approach to take on such matters.

The Council set out in further detail the funding challenges for delivering and maintaining transport schemes in its Deadline 3 submission (REP3-186).

- Construction Traffic Management

With regards to Havering “lamenting” the ten-month closure of Ockendon Road and the impact this will have on Upminster Cemetery and SEC, Havering’s LIR provides further details on measures that could be introduced on some of the diversion routes that would add resilience to the network. Paragraph 7.2.26, Tables 6, and 7 provide further details on such proposals.

LB Havering continues to be of the view that construction of the slip roads to construction compounds still being cited as 24 months’ duration is considered too long.

The Council takes its statutory duty of care to road users seriously and, as such, the proposals set out in Havering’s LIR are very detailed because there are legitimate concerns in relation to safety matters as well as free flow issues. There were similar concerns for the Hinckley Point c DCO around the construction routes and general arrangement drawings and the need to get them right before they are finalised in a control document.

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- Action Points

Please provide suggested wording for inclusion within the DCO or certified document that would enable and support innovative construction practices from contractors.

It is recognised that as part of the detailed design process for the project, the Contractor will explore ways and methods for delivering the construction programme more efficiently. As part of this process the Contractor will be expected to discuss any proposed changes to the construction programme, or methodology used, with relevant Local Highway Authorities and any changes should only be progressed with such Local Highway Authorities' approval.

Written summary of oral comments made at Issue Specific Hearing 6

- Mitigation, Compensation and Enhancement

LB Havering is supportive of Natural England's (NE) suggestion of an audit to better understand what is being lost and where mitigation and compensation is being provided.

LB Havering is supportive of NE's request to re-run biodiversity net gain calculations. LB Havering would suggest that it is necessary to compare figures that are provided now, with those at the detailed design stage.

LB Havering supports the Applicant's view that focussing on metrics isn't always helpful and doesn't support the actual enhancements that will be delivered.

LB Havering is of the view that planning a new habitat is not going to deliver the same amount of biodiversity, unless it is managed appropriately for the correct length of time.

Yours faithfully,



Daniel Douglas

Team Leader Transport Planning

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