



**Havering**  
LONDON BOROUGH

Daniel Douglas  
Team Leader Transport Planning  
Planning  
London Borough of Havering  
Havering Town Hall  
Main Road  
Romford  
RM1 3BD

Mr Rynd Smith  
Lead Member of the Examining Authority

e [REDACTED]@havering.gov.uk  
**text relay** [REDACTED]

Date 3<sup>rd</sup> October 2023  
[www.havering.gov.uk](http://www.havering.gov.uk)

## **London Borough of Havering (20035775) – Comments on Applicant’s Deadline 4 Submissions**

Dear Sir,

### Applicant’s Response to Written Questions (WQ1) (REP4-185)

LB Havering notes the responses submitted by the Applicant to the first set of Written Questions. LB Havering has no specific comments to make on these responses other than to state that the Council’s issues cited in the Local Impact Report (REP1-249) and Written Representation (REP1-253) remain unaddressed.

### Mitigation Route Map (REP4-203)

LB Havering notes and welcomes the Mitigation Route Map (MRM) submitted by the Applicant at Deadline 4 (D4). LB Havering considers that there are outstanding mitigation measures that are not included in the MRM in order to mitigate the scheme impacts. Whilst Havering welcomes the identification of securing mechanisms set out in Table 2.1, Havering’s concerns regarding the funding mechanisms available in order to deliver such mitigation as set out in Havering’s Deadline 3 Submission (REP3-186) remain.

LB Havering notes the contents of Plate 2.1. There is reference to a Traffic Impact Monitoring Scheme as a document that would be prepared by the Contactor post the DCO being granted. It is not clear how that document integrates into the MRM. Furthermore, the Council fails to see why this is not an appendix to the Wider Network Impacts and Monitoring Plan and seeks clarification from the Applicant on this matter.

LB Havering would seek an explanation of the following statement contained in the MRM –

*“The SACR does not contain mitigation measures relied on in the ES but is included here for completeness as it may be used to secure environmental measures requested by*

**The Havering you want to be part of**

*stakeholders outside of the Environmental Impact Assessment (EIA) sphere. The intention of the SACR is to reduce the need for legal agreements by providing a mechanism for legally securing commitments. It assists stakeholders by obviating time/expense associated with legal agreements and speeding up resolution of issues during Examination". Why is there a need to reduce legal agreements? It does not appear that the SACR has speeded up resolution of any issue set before the Examining Authority (ExA).*

### Transport Assessment (TA) Version 3.0

LB Havering has reviewed the revised Transport Assessment (TA) (Version 3.0, dated September 2023, Tracked changes version), published at Deadline 4 (D4) (REP4-149, REP4-151, REP4-153, REP4-155 & REP4-157).

LB Havering acknowledges and welcomes the corrections made to Table 7.13 in relation to the journey time assessment reported in the main TA document.

With the exception of the changes to journey time results reported in Appendix B (REP4-155) and Appendix C (REP4-157), LB Havering observes that no other material changes have been made to the TA.

LB Havering has no further comments to make other than to state that the concerns raised in the Council's Written Representation (REP1-253) with regards to the Applicant's TA (with the exception of Table 7.13 matters) still stand.

### Framework Construction Travel Plan (REP4-159)

LB Havering notes the Applicant's revisions in paragraph 4.3.3 that Contractors will be required to encourage the workforce to use active travel. However, we would seek a firmer commitment to the use of active travel rather than just "encourage". As it is currently worded, there is no guarantee that appointed contractors will push the active travel agenda with their staff. Site specific travel plans should include measurable targets for staff using active and sustainable travel (such as shuttle bus and car share) as a means of getting to work.

It is recognised that the Applicant is encouraging the use of public transport for workers. It must be noted that LB Havering would expect to see shuttle buses coordinated with work force shifts as a minimum and that the use of shuttle buses should be monitored as part of the site specific travel plans.

LB Havering recommends that home based as well as non-home based workers are monitored as part of the mandatory live database which is reported to the Workforce Accommodation Working Group on a monthly basis. By doing so LB Havering will be able to monitor the Havering based workforce in the context of the SEE strategy.

Havering wishes to draw to the attention of the Examining Authority that other issues raised in its LIR (REP1-249) with regards to the CWTP have not been addressed. Further details can be found in paras 12.1.34 to 12.1.44 of that document.

**The Havering you want to be part of**

## Outline Traffic Management Plan for Construction (REP4-161)

LB Havering notes the updated Outline Traffic Management Plan for Construction (OTMPfC) document submitted at D4. Havering's concerns in relation to the duration it will take for the slip roads to the construction compounds being built remain. The comments that LB Havering has made on the OTMPfC, as set out in its Local Impact Report (REP1-249) and Written Representation (REP1-253), still stand.

There appears to be some inconsistency within the document in relation to the duration of the full closure of Ockendon Road. Whilst *Table 4.2 Traffic Management Measures* correctly states that the closure has been capped at ten months, *Table A.4 Roads North Traffic Management Measures* RNTM58 appears to still have the closure period at 19 months. Havering would be grateful if the Applicant could reflect the correct closure duration period of ten months in a future iteration of the OTMPfC.

## S106 Heads of Terms (REP4-145)

LB Havering notes the updated S106 Heads of Terms submission from the Applicant at D4. This fails to address any of Havering's concerns with regards to supporting Local Highway Authorities with appropriate mitigation and Havering's previous comments remain.

Para 11.2 states that S106 Agreements are being drafted with various Local Authorities including LB Havering. The Applicant sent a draft S106 Agreement to LB Havering on 29th September and this is being reviewed.

Until this review is complete, the comments that LB Havering has made on S106, as set out in its Local Impact Report (REP1-249) and Written Representation (REP1-253), still stand.

## Hole Farm Community Woodland: Transport Statement (REP4-218)

LB Havering has reviewed the Draft *Hole Farm Community Woodland: Transport Statement* (TS), prepared by Jacobs on behalf of National Highways (NH), dated 2 May 2023, which was submitted by NH at Deadline 4 (D4).

Section 3 of the TS considers existing network conditions, with sub-section 3.3 (p. 8) specifically considering walkers, cyclist and horseriders (WCH) infrastructure. It is noted that the TS incorrectly states that bridleway number 175 links to Folkes Lane *under* the M25. The WCH baseline conditions should correctly report that bridleway number 175 links to Folkes Lane *over* the M25 via the existing footbridge structure.

LB Havering acknowledges and welcomes the proposed access arrangements for the Hole Farm Community Woodland, which are set out in section 4.1.2 of the TS and shown in Figure 4-1. Reference is made to the provision of a new pedestrian and cycle access point adjacent to the existing footbridge over the M25, providing direct access between the proposed Hole Farm Community Woodland and the existing Folkes Lane Woodland.

LB Havering notes that the TS assessment is based on visitor numbers to the nearby Thorndon Country Park, which attracts over 100,000 visitors per year. The TS identifies this demand as similar to the levels expected at Hole Farm (4.2.1). It is noted that Thorndon Country Park is located approximately 2.5 kms north-east of Hole Farm.

**The Havering you want to be part of**

This anticipated level of visitor attraction to the Hole Farm Community Woodland highlights the importance of sustainable access, particularly between the neighbouring authorities of Brentwood and Havering.

As the Applicant has previously acknowledged, the Community Woodland at Hole Farm is in part being delivered as replacement Open Space for the loss of Open Space land at Folkes Lane Woodland in Havering. Policy 18 of Havering's Local Plan states that replacement Open Space has to be of equivalent standard of better than the Open Space that is being lost. LB Havering would argue that in order for Open Space to be of equivalent standard it has to be fully accessible to its residents. Therefore, LB Havering would consider that safe and accessible crossing provision across the A127, west of the M25 / A127 Junction 29, and onward to the M25 footbridge, is an absolute requirement for the scheme.

The anticipated visitor numbers that the TS assessment is based on would suggest that a significant number of Havering residents would access the site given its proximity to the borough. This also highlights why a safe crossing separated from vehicle traffic is needed.

#### Code of Construction Practise Appendix B Materials Handling Plan

LB Havering notes the changes made in the Materials Handling Plan submitted at Deadline 4. Having reviewed this document, the changes set out have no implications for Havering.

Yours faithfully,



Daniel Douglas

**Team Leader Transport Planning**