



Havering
LONDON BOROUGH

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London Borough of Havering (20035775) - Comments on the Applicant's Deadline 7 Submissions

Dear Sir,

In response to the Applicant's submissions at Deadline 7 please find below London Borough of Havering's comments. Please note that our comments on other documents can be found in other LB Havering Deadline 8 Submissions including Written Representations of Oral Evidence from Issue Specific Hearings.

[Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation v4.0 \(Tracked Changes\) {REP7-129}](#)

LB Havering welcomes the improved coverage of the Local Planning Authority (LPA) archaeology adviser role. The Council also welcomes the new reference to REAC CH009 within the document itself.

LB Havering also welcomes the new references to The Greater London Archaeological Research Framework and the proposed guiding panel of heritage research academics and advisers.

The OWSI now includes reference to conditions surveys of historic buildings being affected (6.4.13 and 14), which is welcome.

However, the document is still missing acknowledgement of Historic England's Regional Science Adviser role during fieldwork, and in some cases liaison with LPA archaeology advisers during fieldwork. As was indicated at Issue Specific Hearing 14, the Palaeolithic addendum is also missing. Havering looks forward to receiving and reviewing this addendum.

[Landscape and Ecology Management Plan](#)

LB Havering has reviewed the tracked changes contained within this document and is content with them.

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Outline Traffic Management Plan for Construction v7.0 (OTMPfC) (Tracked changes) {REP7-149}

Whilst it is acknowledged that the Applicant has improved the timescales for the slip road opening (from 12 to 24 months to 6 to 12 months) and this is welcome, this still leaves a degree of uncertainty as to when, within that time frame, the slip roads will become open. The concern the Council continues to have is how long Havering's own road network will have to be used for construction vehicles. Havering set out some of its concerns around the suitability of some of those roads for construction traffic in its Deadline 7 submission REP 7 -212.

LB Havering welcomes paragraph 2.4.20 and the intention for the Applicant to work with local highway authorities to identify suitable locations for localised junction modelling and the intention for this to be discussed at the traffic management forum. The Council intends to put forward locations for monitoring of construction traffic to the Applicant, in due course.

Whilst it is welcomed and acknowledged that the main body of the document cites the closure of Ockendon Road being capped at 10 months with reference to the commitment contained within the Stakeholder Actions and Commitments Register (SACR-007), it appears that a 19 month closure is still referred to in Table A.4 (ref RNTM58). LB Havering presumes that this is an error and that the Applicant is able to correct this in the next iteration of the document.

The Council's concerns around the impact the closure of Ockendon Road will have on Upminster Cemetery and South Essex Crematorium, remain.

LB Havering welcomes that Plate E1 sets out the engagement between the Traffic Manager and Travel Plan Coordinator, However Havering's concerns as set out in REP7-212 regarding engagement between the TM and TPC remain.

Applicant's response to Interested Parties Post Events Submission.

The Council does not agree with the Applicant's assertion that the proposed WCH bridge across the A127 linking Moor Lane and Folkes Lane is to address historic severances issues. The Council maintains the position it gave in its Deadline 6 submissions REP6-145 and REP 6-147 and its oral evidence at Issue Specific Hearing 10, that the footbridge is required to mitigate the impact of the Project at the M25/J29. The Council also fully supports the representation made by Transport for London on this matter at Deadline 7 (paragraph 4.14 of REP 7-229).

The A127 WCH bridge provides safe crossing provision for active travel modes and, importantly, supports sustainable connectivity between the suburban areas of Upminster town and the replacement public open space for land affected at Folkes Lane Woodland located at Hole Farm, in Brentwood Borough. Without this safe and sustainable inter-borough connectivity, LB Havering contends that the replacement open space at Hole Farm does not meet the accessibility tests set out in the NPSNN and, as such, would not be considered a suitable location. LB Havering specifically notes NPSNN paras. 5.162, 5.166, 5.180, 5.181 and 5.184 in this regard.

Yours faithfully,

Daniel Douglas

Team Leader Transport Planning

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