

## Appendix 1



**FREEPOST LTC CONSULTATION**

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Dear Sir/Madam,

### **Lower Thames Crossing Consultation – response from London Borough of Havering**

1. The following represents the London Borough of Havering's ("the Council") formal response to the statutory Lower Thames Crossing consultation (pursuant to the Planning Act 2008 section 42), dated 10 October 2018, by Highways England ("HE") to construct a new Lower Thames Crossing with associated works ("the Scheme").

#### **Prior Non-Statutory Consultation Responses**

2. The Council remains committed to its prior consultation responses in 2013 and 2016 as summarised below.
3. In response to the 2013 consultation the Council considered that the Lower Thames Crossing ("LTC"), as proposed under the Scheme, should be sited next to the existing Dartford Crossing. The Council's preference for this location was twofold:
  - to avoid routes to / from the LTC passing through the Metropolitan Green Belt, meeting the Council's commitment to Green Belt protection; and
  - the location represented the most viable /deliverable option based on estimated costings provided by HE at the time of the consultation.
4. Based on the information before the Council in 2013, qualified support for the Scheme was given on the proviso that:
  - the location of the LTC was as set out in paragraph 2 above; and
  - the LTC to be complimented with improvements to the adjoining strategic highway network with the Council's borough. The A13 was highlighted as requiring improvement and the Council's response noted the strategic importance of the A13 in securing the successful regeneration of the London Riverside area which is a national, Mayoral and borough priority.

5. The Council responded to HEs second non-statutory consultation in 2016. HE recommended a new location for LTC located further east of Tilbury in Thurrock and Gravesend in Kent.
6. The Council reiterated its strong preference for LTC to be sited next to the location of the Dartford Crossing. The Councils preference for this location remained as previously stated that the location avoided the necessity for routes to / from LTC passing through the Green Belt; and the location would have the least impact on the A127 which suffers from heavily congested traffic flows.
7. The Council discounted all alternative locations proposed by HE for LTC because of the adverse impact on the character and appearance of the North Ockendon and Cranham Conservation Areas and the setting of the listed buildings in this area.

### **2018 Statutory s42 Consultation**

8. The Council welcomes further infrastructure investment within Havering especially where this will provide for safe and convenient movement and support and complement wider investment and growth.
9. The Council welcomes the opportunity arising from this significant infrastructure Scheme to create social value. Social value can be defined as the additional societal benefits achieved beyond the direct scope of a project or contract. By extending the reach of the Scheme, outcomes for individuals and our community can be improved. For example, the benefits associated with social value creation within the Scheme could include education and skills support for career development and supply chain opportunities for business growth. HE is invited to consider the social opportunities this complex Scheme presents.
10. In regard to the current HE consultation for the Scheme to provide a new LTC, on the broad and strategic information provided, the Council recognises that:
  - further adjustments to the current Dartford Crossing (“DC”) will not provide adequate capacity nor resilience;
  - the significant growth identified around the DC and in the wider Thames Gateway (which includes Romford, Rainham and Beam Park all locations in Havering) will be more readily realised if they are supported by major new transport infrastructure. The Thames Gateway Strategic Group (“TGSG”) is a group comprising a number of local authorities set up to lead the strategic coordination of growth and development within the Thames Gateway. The TGSG recently discussed the prospect of looking to establish a Thames Estuary Growth and Prosperity Board. The intention is that the Board will provide a single voice for the Thames Estuary through a strengthened and streamlined TGSG which has informal support from the Government’s Cities and Local Growth Unit. HE should ensure that the new Board (once established) takes account of the opportunities and issues presented by the Scheme. HE should also take the opportunity to be involved in the preparation of the Joint Strategic Plan for South Essex.

- The proposed location for the LTC pursuant to the Scheme is considered to assist towards enhancing the resilience of the wider strategic highway network. The Council recognises that there are currently regular instances of traffic displacement within the borough of Havering from the M25 motorway arising from delays at the DC or incidents on the motorway itself. These instances adversely impact the boroughs communities and businesses by creating further congestion and delay on the boroughs roads (including key strategic roads such as the A1306).
- the Scheme may have a positive impact on the local, regional and national economy. Businesses, employees and residents who currently cross the River Thames for work and recreation will benefit from the improved crossing provision.
- The Councils position on the Mayor of London's draft Transport Strategy was that feasibility work into future east London river crossings should be brought forward.

### **Havering's spatial strategy - benefits from LTC**

11. The Scheme has been designated as a Nationally Significant Infrastructure Project ("NSIP") and will have a significant impact across a number of regions along its route. The Council considers it important that HE fully understands and appreciates the level of development planned in each of the host boroughs namely London Borough of Havering Brentwood Borough Council, Essex County Council, Thurrock Council, Kent County Council, Dartford Council, Gravesham Borough Council, Medway Council ("Host Boroughs"). The level of development results in consequences and constraints that must be considered in design of the LTC looking at the longer term vision beyond completion of any potentially approved Scheme.
12. The Havering Local Plan sets out its vision and strategy for future growth and sustainable development over the next 15 years to 2031. The Local Plan indicates the broad locations in the borough of Havering for future housing, employment, retail, leisure, transport, community services and other types of development. Important considerations are identified through the Local Plan such as:
  - A minimum of 17,500 new homes coming forward over the plan period with most of these in Romford and Rainham and Beam Park. These areas are identified as key areas for growth through their designation as Strategic Development Areas. Both areas have been designated as Housing Zones by the Mayor of London.
  - The Local Plan identifies Romford Town Centre (being the largest town centre in the borough of Havering) as a Metropolitan Centre. Over the Local Plan period, the Council will support the delivery of 5,300 new high quality homes in well managed residential and mixed use schemes that provide attractive places to live and which are well integrated with the existing community.
  - Rainham and Beam Park within the London Riverside Opportunity Area, which includes extensive land in both Havering and adjoining Barking and

Dagenham. The London Riverside Opportunity Area Planning Framework (2015) identifies that the wider area has the capacity to provide 26,500 new homes and 16,000 new jobs across the two boroughs.

- A focus on the intensification of industrial land in the Rainham Employment Area and the creation of a new residential community at Rainham and Beam Park of at least 3,000 new homes which will be served by a new rail station on the C2C line (Beam Park Station).

13. A new LTC must create new connections within the borough for the communities and businesses that exist and are to be developed, in particular those above, for the lifetime of those business and new communities and the operation of the LTC, not simply the construction phase or short-term post-opening operational resolutions.

### **Havinging's transport challenges**

14. HE's traffic forecasting indicates increases in traffic volumes on parts of the Councils road network following delivery of the Scheme. . The Councils transport network requires Highways England to ensure improvements to mitigate against the forecasted growth in traffic. Through a planning obligation, pursuant to Section 106 Town and Country Planning Act 1990 the Council would expect HE to deliver essential improvement projects to both the highway and public transport network within the borough. It is inappropriate for such resultant improvements to be provided for out of the Councils funds.

15. The Council recognises that there are currently east/west transport connections within the borough area, which include two main line railway lines, good bus connectivity and three strategic trunk roads (A12, A127 and A13). There is however recognised limited north/south public transport connectivity.

16. Improved transport connections between Rainham and Romford are required to support the two emerging Greater London Authority supported Housing Zones at Romford and Rainham and Beam Park. There is also an ongoing requirement to improve access for residents and employees to the Elizabeth Line following the opening of a new station at Beam Park (due to be operational by 2021). Improving transport connections within the northern parts of the borough to Collier Row and Harold Hill is considered important. Both areas have relatively modest PTAL levels, and Harold Hill is one the most deprived parts of the borough.

17. The Councils Local Plan and draft Local Implementation Plan set out the strategic transport aspirations the Council believes will be required in order to support future levels of growth in the borough. This includes the need to deliver a new public transport link, connecting the north and south of the Borough via Romford Town Centre, and remodeling Gallows Corner to address congestion and tackle air quality.

18. The Council is currently undertaking feasibility work to develop high level route options for a tram/light rail infrastructure linking Rainham, Hornchurch, Romford, Collier Row and Harold Hill. Further work on this is due to be commissioned in 2019 to consider funding requirements.

19. The Council considers it necessary for Gallows Corner to be transformed to tackle congestion and air quality issues. Gallows Corner is a five arm junction in the borough connecting two strategic trunk roads (A12 and A13, both of which are managed by TfL) with two borough operated roads (Main Road and Straight Road). The junction is heavily congested and suffers from poor air quality. The junction is also considered a significant barrier to anyone from Harold Hill wishing to access Romford, Havering's town main centre. The Secretary of State for Transport announced recently that this junction could be considered for investment through the Government's Major Roads Network (MRN) programme and TfL have been putting together a business case to be considered by the Department for Transport.
20. Alongside vehicle based travel, the Council's Draft Local Implementation Plan (due to be finalised in February 2019) sets out an aspiration for greater use of the river Thames for freight and passenger transport. The Thames is an underutilised resource and making greater use of it for transporting freight, particularly to and from the London Riverside Business Improvement District located south of the A13 in Rainham would contribute towards a reduction in the number of Heavy Goods Vehicles ("HGV") on the borough's Strategic Road Network and in particular the A13 in Havering.
21. The Council's Local Plan and Draft Local Implementation Plan make clear that such transformational schemes are required in order to support the level of growth and jobs planned for the borough, as well as the wider sub region.
22. Turning to the Scheme itself, the Council has concerns about several aspects of it. These include construction and traffic, local highway impacts, bus arrangements, charging regime, noise, lighting, air quality, geology and soils, Heritage and Archaeology, landscape and green belt implications, demolition of buildings, biodiversity and cumulative impacts. The Council expects to have early discussions with HE to resolve the Council's concerns before submission of an application for a Development Consent Order ("DCO").

#### **More information needed about construction sites and traffic**

23. The LTC *Your Guide to Consultation and Approach to design, construction and operation* document advises that the new roads, junctions, bridges and underpasses infrastructure will be constructed at the same time as the tunneling works for LTC. Works would be carried out over a four and a half year period between 2022 to 2026.
24. The Council requires clarification as to the intended timing of construction and pre-construction works, specifically the works proposed within the borough, to enable the implications for residents, employees and businesses to be understood and, where necessary, mitigation measures developed and implemented.
25. More detail is required on the five construction sites identified along the proposed route of the works pursuant to the Scheme. There is particular concern about the

location of the M25 works site currently proposed just south of the new junction with the M25 at North Ockendon. The Council requires clarification about the siting of the construction compound given its close inappropriate proximity to the North Ockendon Conservation Area.

26. Current proposals show a significant number of HGV movements in order to transport material to and from a number of construction sites north of the river Thames. HE have identified "swathes" of roads that construction traffic *might* use to access construction sites for the Scheme but have not identified the specific routes along which construction traffic will pass. HE intends to utilise roads within the borough for construction traffic to serve Construction Area B North (new tunnel), Construction Area C (tunnel to the A13) and Construction Area D (new LTC Road). The LTC consultation document suggests that up to 12,000 HGV journeys per month could be made across these three construction sites.
27. The Council has concerns over the scale of vehicular movements involved during the construction period and would like further explanation / information to understand the actual number of HGV movements that may be expected within the borough.
28. The Council requires further clarification on the specific routes used by HGV's in respect of pre-construction, construction and operation, in order for the implications upon its highways assets to be fully understood. The Council consider that certain road networks and bridges within the borough are not suitable for HGV movements due to weight or width restrictions and local traffic.
29. The Council requires further explanation about the operational use of the construction site itself particularly in terms of how HGV's will enter and exit the site.
30. The Council will require HE to work with the Councils New Roads and Street Works department to agree on all temporary diversion routes necessary to facilitate construction work on the Scheme.
31. The Council welcomes that HE are considering the options to transport material by river to reduce the number of construction movements by road. The Council recognises that transportation of material would necessitate the construction of a new jetty or the modification of an existing jetty located on the River Thames.
32. There is wharf infrastructure within London Borough of Havering that is currently safeguarded. Recently the GLA consulted on a review of all safeguarded wharves. The Council considers it important that safeguarding is retained at both Phoenix Wharf and Halfway Wharf with a view to future use.
33. The Council consider it appropriate for HE to undertake greater use of the river Thames for both freight and passenger transport. The river presents an opportunity for both transportation of materials and spoil from the Scheme, whilst at the same time reducing the number of HGV vehicles movements on the boroughs highway infrastructure particularly the A13.

34. The existing infrastructure at Phoenix Wharf and Halfway Wharf requires upgrading and the Council would encourage HE to consider investing in these wharves as potential locations to be used to transport material and spoil to/from the construction sites.

### **Traffic Implications**

35. HE has produced high level traffic modelling data showing forecasts under a “do nothing” scenario (i.e. without the new LTC) and a “do something” scenario (i.e. with the new LTC).
36. The accompanying LTC *Traffic forecast non-technical summary* states that the modelling work shows changes in traffic flows for “links” of the road network, but not for junctions. The Council notes that the traffic model shows the change in predicted traffic in 2026 and 2041 between a “Do Nothing” and “Do Something” scenario.
37. The Council is concerned that the non-technical summary only provides a standalone picture of traffic forecasts for 2026 and 2041. To enable the Council to fully assess the traffic implications of the Scheme a comprehensive understanding is required of the changes to traffic flows from a baseline (e.g. 2018), and the year of opening.
38. The deficiencies in the traffic model have been raised with HE. The Council welcomes HE’s commitment to publish baseline data (in the form of ‘shapefiles’) in early 2019 so that the current situation and future year traffic growth can be adequately compared.
39. The Council has some specific comments on the traffic forecasting data and these have been set out below.
40. A section of the A13, within the borough, forms part of the TfL Road Network (TLRN). The Council has concerns that HE’s forecasting predicts an increase in traffic flow on the A13 east bound towards Junction 30 of the M25. This is a result of “new” trips being made over the DC by users previously deterred from using the crossing because of congestion. The A13 is already a heavily congested road in the AM and PM peaks, and over the next 15 years traffic volumes along the A13 are expected to increase as a result of sub regional growth (particularly in the contra peaks when there is more available capacity at present). Strategic Modelling commissioned by the Council to support the Havering Local Plan shows that by 2031 the A13 near Rainham will see traffic increasing by approximately 40% eastbound and 4% westbound in the AM peak.
41. During periods of heavy congestion on the A13 (particularly when there is a problem on the DC), vehicles displace from the A13 and utilise the A1306 New Road. The Council is developing proposals to transform the A1306 which will see traffic realigned onto the northern side of the carriageway and the southern side opened up to sustainable travel opportunities, continental style cafes, and play

areas. This is being delivered to support growth of the Rainham and Beam Park Housing Zone and provide sustainable travel options for people travelling to the new Beam Park station. The Council is concerned that an increase in traffic flow on the A13 could result in increased “rat running” of borough roads such as the A1306.

42. The Council has concerns that HE’s forecast identifies the A127 to experience an increase in traffic flows as a result of the Scheme both in the AM and PM peaks. The stretch of A127 between Junction 29 of the M25 and Gallows Corner junction is a critical piece of highway infrastructure for the borough and the wider east sub region.
43. The Council has worked collaboratively with neighbouring authorities to discuss the measures that can be delivered to mitigate against the adverse impacts of development and growth (as set out in authorities respective Local Plans) along the A127 corridor. A Statement of Common Ground was signed by relevant authorities committing the signatories to on-going collaborative work. TfL undertook Strategic Modelling in support of the Councils Local Plan. The modelling forecasts traffic on the A127 to increase by 5% west bound and up to 13% east bound in the AM peaks and increases of 2% west bound and 3% east bound in the PM peak by 2031.
44. The Council has reviewed the ‘shapefiles’ information published by HE. The information indicates that a number of approaches to junctions and routes in the borough are already heavily used and will be adversely affected by the Scheme. The Council requires early discussions with HE to develop appropriate mitigation measures for these.
45. HE’s data shows that parts of the boroughs road network are likely to be close to operating capacity or operating above capacity following opening of the proposed LTC (in 2026) pursuant to the Scheme. A number of the identified roads (such as the approaches to the A127 from Ardleigh Green Road and Squirrels Heath Road) are already congestion ‘hotpots’ and any increase in traffic flows are likely to lead to further delays at junctions.
46. The approaches to junctions in the borough that are expected to be operating close to, or at capacity, in 2026 and are:
  - the approach to Gallows Corner from Main Road;
  - the Ardleigh Green/Squirrels Heath junction with the A127;
  - St Marys Lane (Bell Corner junction);
  - Clay Tye Road.
47. Some of these approaches are also already operating close to capacity so any increase in traffic volumes will lead to further delay in queue lengthening and ‘knock on’ effects elsewhere on the network.
48. The Council requires further discussions with HE to secure mitigation measures to minimise the impact of increased traffic volumes at opening and in the future which that are as a result of the Scheme.



49. HE's data identifies a number of other roads, in the borough, that will be impacted by increased traffic flows as a result of the Scheme including:
- Gubbins Lane, (which is already being used as a rat run between the A12 and A127 to bypass the current Ardleigh Green Bridge works on the A127);
  - Hall Lane;
  - Avon Road;
  - Wingletye Lane.
50. HE's data suggests that motorists will use the A127 to access the M25 and ultimately the new LTC junction. Increases in traffic flows, particularly on roads that are already considered to be operating at or near to capacity, is of concern to the Council and HE must provide mitigation measures as considered appropriate by the Council.
51. Anomalies in the shapefile data provided by HE to support the Scheme have been identified and these are listed in Appendix 1 to this response. The Council requires HE to review the anomalous results and advise the Council accordingly.
52. The Council welcomes HE's agreement to undertake further data modelling on specific junctions in the borough. The Council is particularly keen to review the impact that the Scheme will have on junctions connecting borough roads with the Transport for London Road Network (TLRN). An understanding needs to be gained of the level of any increased delay that will be experienced by motorists at these junctions. A list of the junctions that the Council need further information on is set out in Appendix 1 to this response.
53. The Council welcomes HE's continued engagement on the traffic modelling and traffic implications of the Scheme. TfL must be engaged by HE in future discussions. The Council will establish a joint working group involving HE and TfL in early 2019.
54. The Council recognises that traffic modelling work for the Scheme is an "evolving process" and will require periodic updating by HE particularly with regard to the effect of proposals for new developments within the borough. The Council will advise HE of any new planning applications for housing developments that are approved in order to better inform the traffic modelling. HE must recognise that the Council requires fully comprehensive up to date data in order to provide relevant input to the DCO process.

### **Local highways impacts**

55. The Council welcomes that a new Public Footpath is proposed between Dennises Lane (in Thurrock) and near Hall Farm (near St Mary Magdalen Church) ("Footpath"). The Footpath is to be carried over the new LTC Road on a new overbridge and connect with the existing Public Footpath 252 by means of a new structure spanning the Essex Thameside rail Line and the M25 motorway. The

Council expect HE to guarantee that it will meet all maintenance liability for the Footpath.

56. Network Rail has indicated that it is looking to close the level crossing known as “Eves” and ‘stop up’ parts of existing public highway as part of the Anglia Level Crossing Reduction proposals. The Council considers it essential that HE engages Network Rail in the detailed design of the proposed LTC junction.
57. The Council notes that the Scheme proposes the realignment and movement (south) of Ockendon Road, together with the construction of a new bridge over the new LTC Road and a replacement bridge provided at the location that Ockendon Road crosses over the M25 motorway.
58. The Council is concerned about the new road alignment from a point east of the M25 where a new access arrangement is proposed for properties along Ockendon Road. The Council considers it appropriate for further discussions to be held with HE about the detailed design of Ockendon Road to ensure that the highway layout is rationalised. The current turn arrangements for accessing properties along Ockendon Road (east of the M25) appear unsuitable in their current form.
59. The Council recognises that the works to Ockendon Road, the replacement overbridge and the creation of a new overbridge over the new LTC Road will involve temporary traffic diversions and traffic management measures. The Council requires further discussions with HE about these works and the nature of any route diversions.
60. With reference to the *approach to Design, Construction and Operation* consultation document the Council notes that the new junction on the M25 is likely to be one of the first contribution “active” sites due to the complex nature of the proposals.
61. For the new bridges over the M25 and LTC Road the Council expects to be involved at an early stage to ensure that its ongoing maintenance liabilities are minimised and that maintenance issues are designed out.
62. Further specific technical comments on the highways implications of the Scheme are listed in Appendix 2 to this response.

### **Bus arrangements**

63. The No 370 Bus Route between Romford Town Centre and Lakeside shopping centre (“Bus Route”) proceeds along Ockendon Road. The Council recognises that the Bus Route is a vital link for many residents of the borough travelling between Cranham and Romford Town Centre. There are two bus stops on the Bus Route that will be affected by proposed works to Ockendon Road.

64. The Council considers it essential that the bus stops are re-provided following completion of the works to Ockendon Road. HE should engage with TfL London Buses who are responsible for bus infrastructure in Havering.

### **Toll charging schedule**

65. The Council notes that HE will not confirm their charging proposals ('tolls') for use of the LTC until their DCO application is submitted. An approach involving such a lack of consultation is considered inappropriate. In the event that a toll was to be introduced through the proper individual statutory procedure, as a charging order, then relevant statutory consultation would occur. The Council must be fully informed of tolls prior to submission of the DCO, particularly as financial modelling requires the data to be readily available.
66. The Council strongly advises HE to implement a comparable charging scheme to that at the DC. Imposing a different charging scheme on LTC could lead to one crossing being used more than another with greater traffic levels expected in the vicinity of a crossing that imposes "cheaper" tolls. The Council strongly stresses that a consistent approach needs to be taken to tolling regimes across all crossings along the Thames.
67. The Council maintains its position that its residents, employees and businesses should benefit from a discount for use of the LTC and the Dartford Crossing. The Council strongly asserts that the charging schedule for LTC should provide residents, employees and businesses of **all** Host Boroughs with discounted rates.

### **Noise**

68. The Council supports the methodology proposed for the noise and vibration assessments as detailed in the Preliminary Environmental Information Report ("PEIR").
69. The Council considers it appropriate to work closely with HE and their agents/consultants with any further baseline monitoring proposed for the Scheme both in terms of the existing monitoring sites and additional monitoring sites.
70. The PEIR identifies options for the mitigation of noise for both the construction and operational phases of the Scheme. The Council will look to work closely with HE to ensure that the options incorporated into the Scheme fully protect the residents/sensitive receptors in the borough for both the construction and operational phases of LTC and the wider Scheme.
71. Further technical comments can be found in Appendix 3

## **Lighting**

72. It is noted within the PEIR that the lighting design is at an early stage of development and that the extent of new lighting is yet to be confirmed. It is welcomed that all highway lighting will be in accordance with the appropriate lighting standards and guidance and that the intention is for energy efficient lighting to be used throughout the Scheme.
73. The Council must have sufficient time to review the final design for the proposed new footbridge between Dennises Road in Thurrock and Public Footpath 252 in Havering with appropriate illumination / lighting prior to submission of the DCO.
74. It is considered essential that the layout and appearance of night time lighting at the construction compound in North Ockendon is agreed with the Council prior to installation. The construction compound is in close proximity to the North Ockendon Conservation Area and to residential properties in North Ockendon such as Church Lane and the B186 North Road. The Council considers it important that light pollution is minimised and HE implements any necessary mitigation measures.
75. The Council welcome discussion at a future technical meeting with HE once lighting plans for the construction period and lighting plans for the completed Scheme have been further developed.

## **Air Quality**

76. The Council has an adopted Air Quality Action Plan ("AQAP"). The AQAP identifies the key transport routes of the M25, A13, and A127 as major sources of motor vehicle tailpipe emissions which are the main source of pollution in the borough.
77. The AQAP identifies major trunk roads in the borough as having some of the highest annual mean levels for nitrogen dioxide and particulate matter in the borough. The major trunk roads in the borough are the responsibility of TfL. If additional traffic is forecast to use the boroughs strategic roads, in particular the A127 and Gallows Corner junction, the average annual mean levels for NO<sub>2</sub> and PM<sub>10</sub> are considered highly likely to deteriorate.
78. The Council expects HE to engage with TfL and the Council to agree suitable mitigation measures to reduce the impact of the Scheme on local air quality.
79. The Council agrees in principle with the methodology set out in Section 6.3 of the PEIR.
80. The Council notes that the air quality impacts of the pre-construction and construction phase of the Scheme have not been assessed in the PEIR.

81. The Council must have sufficient time to input into a full detailed assessment that will be undertaken before submission of the DCO application. It is noted that the results, mitigation measures, including the mechanism to secure mitigation, will be fully detailed in HE's Environmental Statement.
82. The Council considers it appropriate to locate sensitive receptors within 200m of the development boundary, A127 and Front Lane, to the south west of junction 29 of the M25 motorway.
83. The Council considers it appropriate that HE should consider including sensitive receptors along the following roads:
- Front Lane,
  - Roseberry Gardens
  - Waycross Road
84. The Council considers it appropriate for Engayne Primary School and James Oglethorpe school, to be added to the location of sensitive receptors within the impact assessment.
85. HE must engage with the Councils Public Protection Department regarding the selection of sensitive receptors and model verification prior to submission of the DCO application.

### **Geology and Soils**

86. The development area for the Scheme is in the proximity to three historical landfill sites in Havering:
- Groves Farm
  - Hall Farm and
  - Land adjoining Chapmans Farm
87. The Council agrees, in principle, with the mitigation measures outlined in Section 11.6 of the PEIR to minimise the risks to human health and the environment posed by land contamination, during the construction and operation phases of the Scheme.
88. The Council look forward to early engagement by HE with the Councils Public Protection Department prior to the commencement of the investigation works, in particular in regard to the design of the ground investigation (e.g. soil sampling strategy, gas monitoring strategy etc.).
89. Further technical comments concerning Geology and Soils can be found at Appendix 4.

## **Heritage and Archaeology**

90. The Council has concerns over the impact of the construction site on heritage assets. These include the North Ockendon Conservation Area and nearby listed buildings in the North Ockendon area (including Grade I and II listed buildings).
91. The Council and HE must continue to engage on matters of Heritage and these discussions must include Historic England, and other stakeholders (as considered necessary).
92. The Council notes in the PEIR HE's proposed 1km study area, which is not considered sufficiently wide. The Council recommends a 2km wide study area.
93. The Council considers it essential that HE must undertake interior inspections of all heritage assets at an early stage to better understand the direct and indirect impacts of the Scheme upon these.
94. The Council also considers it necessary for HE to assess impacts (such as views and noise) from interior spaces with appropriate mitigation measures put forward as necessary.
95. A notable indirect impact of the Scheme will be the requirement for secondary glazing to historic properties, to mitigate noise implications upon residents, and the impact this will have upon the significance of these assets. The Council expects HE to identify and assess indirect impacts within future reports.
96. Further technical comments concerning Heritage and Archaeology can be found at Appendix 5.

## **Landscape and Green Belt Implications**

97. The London Borough of Havering is one of London's greenest boroughs with extensive open spaces and more than half of the borough designated as Metropolitan Green Belt. Elements of the Scheme (specifically the new junction of the link road for LTC and M25 motorway) will impact the boroughs Green Belt. It is a key objective of the Councils Local Plan to "protect and enhance Havering's Green Belt".
98. The Council considers it appropriate for HE to provide further detail about the consideration given to the visibility of storage of spoil, excavation areas for balancing points and material storage areas which have the potential to adversely impact the boroughs Green Belt.
99. The Council is a partner in the Thames Chase Community Forest (including the Land of the Fanns Landscape Partnership). Elements of the Scheme (specifically the new junction of the link road for LTC and M25 motorway) will be within the

Thames Chase Community Forest. The Council has concerns over the visual impact of the Scheme on the Thames Chase Forest Centre and the impact both visually and in terms of noise and lighting during the construction phase. The PEIR further states that land take and vegetation removal within the Thames Chase Forest would also be required.

100. The Councils Local Plan sets out clearly that developers must work with existing partnerships to support and enhance green infrastructure provision. The Thames Chase Community Forest (being a partnership) should expect support from HE as a developer putting forward a DCO.
101. The Councils Local Plan also designates Thames Chase as “open space” and policy 18 commits the Council to protecting the borough’s designated open spaces from development unless it can be demonstrated that “replacement provision of equivalent or better quantity and quality will be made in a suitable location.
102. HE must engage with Thames Chase and the Council to agree appropriate mitigation for the impact on the Thames Chase Community Forest.
103. Further technical comments concerning landscape can be found at Appendix 6.

### **Demolition of buildings**

104. Map book 2 *Land Use Plans* identifies several buildings along Ockendon Road which require demolition to facilitate the Scheme. The plans indicate that access to a number of buildings along Ockendon Road and St Mary’s Lane will be partially affected or that the buildings themselves will be adversely affected by the Scheme.
105. The Council notes that the consultation material includes information on compulsory purchase and expects HE to fully engage with landowners of affected properties. Where necessary, appropriate mitigation and relocation packages for property owners should be agreed with residents by HE. The Council expects HE to only use compulsory purchase powers as a last resort, meet the statutory tests and consult with the Council as to any residents who may be included within a Red Line area.
106. The Council recognises that the Scheme will have direct impacts on local businesses such as business premises require relocation, demolition or limitations on access to business premises. The Council also recognises the many indirect impacts that the Scheme will have on businesses and employees, such as the effect on the local environment in which the business operates increased transport costs for employees and goods, relocation of supporting

residents and infrastructural services. The Council considers it appropriate for HE to engage individually with affected businesses, employees of affected businesses and those with interests in the premises of affected business and agree suitable relocation and compensation packages.

## **Biodiversity**

107. Policy 30 of the Local Plan Nature Conservation states that the Council will protect and enhance the rich biodiversity and geodiversity in Havering by protecting Sites of Special Scientific Interest, Local Nature Reserves and Sites of Importance for Nature Conservation. The Havering Nature Conservation and Biodiversity Strategy (2014) sets out how the Council and its partners will promote, protect and enhance biodiversity in the borough. The Council considers it inappropriate for such areas to be adversely effected.
108. The PEIR indicates predicted loss of habitat, and fragmentation of remaining habit likely to affect several ancient wooded areas including Franks Wood, and Clay Tye Wood in Havering. Ancient woodlands such as Clay Tye Wood and Franks Wood require appropriate surveys and assessment to ensure that development is in line with the Councils Local Plan Policy 30 on Nature Conservation.
109. The Council requires engagement with HE on the potential locations and methodologies for any translocation of ancient woodland soils and new woodland planting in the borough.
110. The Council requires engagement with HE on the avoidance of any adverse effects on Ancient Woodland or if the Council considers this not to be an option then on compensation packages for any loss of Ancient Woodland in Havering. To include the management of nearby Ancient Woodland and restoration of plantations on Ancient Woodland sites. The Council expects HE to provide a suitable planning obligation, pursuant to Section 106 Town and Country Planning Act 1990 to deliver these objectives.
111. The Council notes the reference in the PEIR to an outline Environmental Management Plan (EMP). The Council expects HE to prepare both a Construction Environment Management Plan (CEMP) and Landscape and Ecological Management Plan (LEMP) linked to the DCO.
112. Further technical comments concerning Biodiversity can be found at Appendix 7.

## **Cumulative Impacts**

113. In addition to the Scheme for the LTC, a further DCO scheme is being prepared by HE for capacity improvements to the junction of the M25 motorway with the A12 trunk road in Havering at Junction 28 of the M25.



114. The Council is extremely concerned about the potential cumulative impact arising from two substantial infrastructure projects being built concurrently in close proximity to the boroughs strategic highway network.
115. It is likely that there will be a considerable adverse impact on the local highway network in the borough and its wider environment if traffic is displaced from the motorway pre and during construction of these projects.
116. It should be further noted that within the east sub region TfL are planning improvements to parts of their own network over the next few years including the Lodge Avenue Flyover (A13) in the borough of Barking and Dagenham and a safety improvement scheme at Gallows Corner. This again highlights the need for a working group between the Council, TfL and HE so that these works can be discussed in greater detail to ensure a co-ordinated approach.


### **Planning Performance Agreement (PPA)**

117. The Council is currently in discussion with HE to agree a Planning Performance Agreement ("PPA") for financial provisions to support the Council through the DCO process. Such an agreement will enable the Council to properly support the DCO process both in terms of assessing the issues and providing timely input into the process. It is hoped that a PPA will be agreed and signed between LBH and HE early in the New Year. In the absence of a PPA the Council will be insufficiently resourced to meaningfully engage with the DCO process.

### **Ongoing engagement**

118. Monthly technical meetings have been established between Council Officers and HE. These have provided opportunities to discuss different elements of the proposals.
119. The Council welcomes this engagement and looks forward to these technical discussions continuing on the aforementioned topics over the coming months.
120. The Council wishes to continue to be involved as these proposals are further developed.

Yours Sincerely



Helen Oakerbee  
Assistant Director of Planning

