

UPMINSTER & CRANHAM RESIDENTS' ASSOCIATION

110 Springfield Gardens
Upminster
Essex
RM14 3ET

8th September 2021

LOWER THAMES CROSSING

1. We are responding on behalf of the Upminster and Cranham Residents' Association to the consultation on the proposed Lower Thames Crossing (LTC). We have a membership of over 8000 homes across the Upminster and Cranham wards and have, since the inception of Havering Council, had representation on Havering Council. I should point out that North Ockendon is contained within the Upminster Ward.

2. We have a number of concerns regarding the current proposal. We have grouped our comments and concerns in three sections:

a) Advanced Actions which are essential before the development phase.

b) Development Phase, covering:

- I. The resulting increase in the amount of HGV traffic on local roads and the impact on local residents;
- II. The considerable loss of green belt land, in particular regard to Thames Chase and ancient woodland;
- III. The environmental effect of increased noise, air and light pollution and an increased risk of flooding to the local area;
- IV. The destruction of irreplaceable local heritage;
- V. The absence of any compensation for the inconvenience to the majority of residents in Upminster, North Ockendon and Cranham.

c) Once the Road is Open, covering:

- I. The additional traffic and road noise;
- II. The long term environmental effect;
- III. The effect on pedestrians and cyclists.

ADVANCE ACTIONS

3. In advance of the Development Phase, the following actions are necessary:

- a) Introduce weight restrictions in Front Lane to mitigate against increased traffic and the snarling up of this widely used alternative route;

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- b) Installing a Zebra Crossing in Front Lane near to Isis Drive to mitigate against the increased risk to children walking and cycling to Hall Mead School and Engayne School;
- c) Regular engagement with Ward Councillors at the 'Local Impact' development phase.

DEVELOPMENT PHASE

The catastrophic effect on those households close to the proposed road

4. The proposal results in the demolition of a number of homes in the North Ockendon area. In addition, the access to a number of homes, particularly in Ockendon Road and St Mary's Lane would be adversely affected. We would expect Highways England to engage with us and the householders with regard to compulsory purchase and discretionary purchase at full market rates.

The resulting increase in the amount of HGV traffic on local roads

5. We are extremely concerned about the increased HGV traffic on local roads during the construction period of several years. There large number of HGV journeys will have an adverse effect on the local air quality. The temporary worsening of air quality due to dust and emissions identified in Ockendon Road, Church Lane and Clay Tye Road will impact on Cranham/Upminster residents, depending on the wind direction.

6. We are also concerned about the effect on local road surfaces. We would expect Highways England, as part of the project to provide additional funds, to repair the damaged road surfaces throughout the construction phase and to make good any damage at its completion.

7. We are concerned about the noise levels as there will be 24/7 construction work on the area immediately adjacent to the M25 in our area. Although the consultation document states that the work noise (in Db) would be less than is already present, it is significant that there will be night time workings, seven days a week. This represents an increase to noise levels outside normal traffic levels which will have an impact on some Cranham residents. Indeed the consultation document does refer to 'short-term noises that are louder', which as these may be heard during night time, will be disruptive. (Details are on pages 218-223 of the Ward impact summaries document.) As a result 24 hour working on seven days a week is unacceptable because of the strain it will place on local residents.

8. Any hold up on the M25 or A127 as a result of the construction work will spill onto the local roads in Cranham and Upminster as motorists attempt to find a way round the hold up. Indeed, it is planned that parts of the A127 will have narrow lanes and a 50mph speed limit for 27 months during construction, which will undoubtedly lead to hold ups and drivers seeking alternative routes. One partial mitigation necessary is the introduction of a weight restriction, preferably before construction begins, from A127 onto Front Lane. Other matters, such as the Zebra crossing and additional trees along Front Lane, are already in hand, but must be seen through.

9. The lack of a westbound link onto and from the A13 would prevent any of Havering's industrial areas in the Rainham area, as well as Purfleet in Thurrock, from

benefitting from any improved connectivity between Kent and Essex, as any HGVs needing to access these areas would have to use the existing Dartford Crossing route. The present proposals include a direct link onto the A127, which is a far lower grade road than the A13 and totally unsuitable for the increased traffic use that will result. Together with all the other points made in this response, it would be a far better proposal to remove the direct link onto the A127 and spend the money saved providing a westbound access link onto and from the A13.

10. The planned closure for around two years of Ockendon Road and the consequential extensive road diversions are completely unacceptable. It would add many miles and significant time to journeys between, for example, Corbetts Tey and North Ockendon. This would have a disastrous effect on those needing to visit Upminster Crematorium from areas to the east of the closure. It would also severely disrupt the 370 bus route causing great inconvenience to passengers. What discussions have taken place, or are planned, with Transport for London about diversions to the 370 route and their estimates of the additional journey times?

11. The legend on the third page of the consultation booklet shows works planned to be included/carried out in Church Lane and Ockendon Road. The map shows that within the red lines the roads will be excavated for utilities, but it's unclear if this is drainage or a range of other things. We need clarity on what work is being undertaken.

The considerable loss of green belt land and wildlife habitats

12. We are concerned in general with the loss of green belt land. The current proposal will have a considerable impact on the green belt in Upminster. In particular the effect of the proposal on Thames Chase Forest Centre will be catastrophic. This is a local amenity used and enjoyed by a large number of residents in Upminster and Cranham. We note from the current proposal that a significant proportion of green belt land is taken from Thames Chase, which is unacceptable. Moreover, the new junction would have a disastrous impact on the centre both visually and in terms of noise and lighting during the construction period and, we fear, thereafter as well. It is clearly essential that Highways England put in place measures to ensure the continued integrity of Thames Chase.

13. It is proposed that ancient woodland will need to be cleared in Folkes Lane due to the diversion of a gas pipeline. It is proposed that new woodland will be planted on the eastern side of the M25, which is outside of Havering's boundaries. Ancient woodland is irreplaceable by its very classification. Moreover no mitigation is being afforded to Havering for this loss. An alternative diversion of the pipeline needs to be found so as to protect the ancient woodland.

14. The project will involve the removal of areas of wildlife habitat in the Cranham and Upminster wards, both temporarily and permanently. Within a relatively short distance of the boundary of the Order Limits there is a designated site: Cranham Brickfields Local Nature Reserve. Highways England have identified a range of protected and notable species in these areas, including bats, terrestrial invertebrate species, great crested newts and reptiles. It is vital that measures are put in place to guarantee the protection of this nature reserve. What measures are planned?

The environmental effect

15. We are concerned about the health risk associated with the development in the proximity of three historic landfill sites (Groves Farm, Hall Farm and the land adjoining Chapman's Farm). Again we need to know what steps Highways England are taking to assess and mitigate the risk.

16. There is no mention of the environmental impact of flooding in the impact summary ward book. Some parts of Cranham and Upminster flood on a regular basis. Bearing in mind the recent warnings regarding increased flooding in low-lying areas, this is almost certain to increase with the extra lanes being proposed as part of the project. During the construction period there will be an even greater risk of flooding in the surrounding area; this particularly concerns residents in Clay Tye Road, but applies more widely. We need to know what steps Highways England are taking to mitigate the risk.

17. The solar farm adjacent to St. Mary's Lane, immediately west of the M25, is due to be permanently acquired by Highways England and is designated as a 'Receptor site for protected species' post construction. However, there is no mention of the environmental impacts of the loss of the solar farm or what, if any, measures are proposed to mitigate for this. If there are currently no plans, as the absence of any in the documentation suggests, this needs to be addressed.

The destruction of local heritage

18. There are several Grade One and Two listed buildings in the North Ockendon area. Of particular note there are the 11th century St Mary Magdalene Church and its 18th century rectory. In addition, there several cottages dating from 17th century and the Old Forge, also from the 17th century. We need to know what measures Highways England are taking to protect these building which are of great historical importance. We propose that Highways England consider a route further North that would completely avoid putting these buildings at risk.

Compensation for the inconvenience to residents in Upminster and Cranham

19. We understand that the residents of the boroughs of Thurrock and Dartford are already exempt from the toll to use the Dartford crossing as a way of compensation for the consequential disruption to their local environment. It is clear that residents in the Upminster and Cranham wards of the London Borough of Havering will be equally adversely affected by the construction of the LTC. Indeed, the adverse effect is likely to be greater than that experienced by many residents of Dartford and Thurrock. Therefore, Highways England should extend the exemption of the toll for the M25 and the LTC to all residents in the London Borough of Havering both during the construction phase and thereafter.

ONCE THE ROAD IS OPEN

Additional traffic and road noise

20. There will be additional road noise due to increased traffic. The only reference to specific mitigation is that of quieter road surface material. There is no mention of acoustic barriers or similar. Nevertheless acoustic barriers will be essential to prevent unreasonable

noise pollution in the area. In addition, as part of the M25 is raised, there needs to be addition of planting, to both screen the road and mitigate the noise.

21. We are concerned about the permanent increases in road traffic that would result for the Lower Thames Crossing along both the A13 and A127. Both trunk roads are already extremely busy, operating at or near capacity at the busiest time during the day. There will also be additional traffic on other local roads.

22. Indeed the traffic modelling data points towards significant increases in traffic in parts of Cranham during the morning rush-hour period (see below). (For the Front Lane traffic, although there are no significant impacts shown on surrounding roads, there will be due to vehicles spreading out along Avon Road and further down Front Lane, Marlborough Gardens, Ingrebourne Gardens etc.)

- a. The modelled time (7am-8am) shows up to 1,000 extra vehicles (+40%) using the westbound section of the A127 from the M25 junction.
- b. Up to 250 extra vehicles (+40%) travelling south in Front Lane between the A127 and Avon Road during the same period.
- c. Up to 250 extra vehicles (+20%) travelling north in Hall Lane between The Fairway and the A127 during the same period.
- d. There are no significant predicted impacts off-peak or during the evening peak period.
- e. In Emerson Park Ward, it is predicted that up to 500 extra vehicles (over +40%) will use Wingletye Lane southbound between the A127 and Sylvan Avenue during the same period. This will in turn lead to up to 250 extra vehicles (over +40%) using the rest of Wingletye Lane southbound and the same number (over +40%) for Sylvan Avenue westbound.

23. We need to know what measures Highways England are planning to offset the effect of this additional traffic.

24. In addition, despite the increased traffic volume that has been identified for Cranham, there is no mention of the impact on the 248 bus service, which would be delayed as a consequence. What discussions have taken place, or are planned, with Transport for London to offset the likely delays?

25. In addition to the regular increase in traffic levels, when there is any hold up on the M25 and/or the LTC, even higher levels of traffic will shift to local roads. This is already a problem when the M25 is blocked in the area, with traffic using local roads, eg St Mary's Lane, Avon Road and Wingletye Lane and this will only get worse with the additional traffic. What measures Highways England are planning to offset this?

Long term Environmental effect

26. In more general terms we are very concerned about the long term effects on the environment surrounding the LTC in Upminster. We fear that there will inevitably be a significant increase in air pollution in the area as a result of the increased traffic the LTC will attract. This will have an adverse effect on the air quality at Engayne Primary School and

James Oglethorpe Primary School. We need to know what measures Highways England plan to measure pollution levels and what remedial action will be taken to offset increased pollution.

27. Indeed, there are predicted to be minor increases in nitrogen dioxide levels along the A127 and Front Lane (north of Avon Road). At the moment, no mitigation offer has been made. This needs to be addressed.

28. Similarly, no mitigation is identified for the increased and closer lighting columns which will increase light pollution. Again this needs to be addressed.

Effect on Pedestrians and Cyclists

29. We feel strongly that walking and cycling routes would need to be improved around the A127/M25 junction. Pedestrians and cyclists will only have access to the northern side of the A127 with no indication of access to the southern side. In addition, pedestrians and cyclists will only have access to a safe crossing of the A127 on the eastern side of the M25, with no safe provision on the western side. Proposals are needed from Highways England that address this issue.

30. The land on Manor Farm is being used during construction. There are plans to hand the land back for agricultural use after completion. However, we expect that agriculture will become unviable due to pollution and logistics once the new road has been built. There needs to be detailed plans in place to ensure that the land can successfully be returned for agricultural use. What plans are there?

Conclusion

31. Highways England's consultation document indicates that, after the completion of the LTC, the traffic levels on the existing Dartford crossings will be only very marginally lower than now. Therefore, because of the disruption and the potential downsides listed above, the current proposals would not provide good value for money.

32. We look forward to receiving Highways England responses to the issues we have raised.

Yours sincerely

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