Dear Martyn,

Thank you for the invitation to comment on the borough’s new CIL draft charging schedule. I am responding on behalf of Transport for London and the comments here are based upon the proposed charging schedule itself and the supporting documents, particularly the Viability Study (July 2018), Draft Infrastructure Delivery Schedule (March 2018), Infrastructure Funding Gap Report (August 2018) and Draft Regulation 123 List (August 2018).

As you are aware, the Mayor’s adopted Charging Schedule (MCIL1) came into effect on 1 April 2012 and the Examination in Public for the proposed Mayoral Charging Schedule 2 (MCIL2) was recently completed. We are pleased to note that the proposed MCIL2 has been taken into account by BNP Paribas Real Estate in their Viability Study Report and subsequently in the rates proposed in your draft charging schedule.

I have noted that the Council has included a draft Regulation 123 list, which indicates the types of infrastructure/infrastructure projects intended to be funded or part funded through CIL and planning obligations. I have also noted the exclusion of transport infrastructure from the list and the intention to secure funding for site specific transport infrastructure along with contributions to Beam Park Station and Rainham Creek Bus/walking/cycling bridge through planning obligations.

As you are aware, the proposed growth set out in the Havering draft Local Plan is considered to be dependent upon and facilitated by significant public transport investment and improvements. The supporting Infrastructure Funding Gap Report sets out an overall infrastructure requirement cost of £578 million, of which £115 million relates specifically to transport infrastructure.

Yours sincerely,

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MAYOR OF LONDON

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I am concerned that the proposed approach to CIL and planning obligations may restrict the ability to secure much needed funding for transport infrastructure in the borough. It is also at odds with the Havering draft Local Plan which sets out in paragraph 14.0.20 that “funds secured through CIL will be used to deliver key community infrastructure as such as education, health facilities, libraries, community care, community facilities and transport projects (except certain site specific works).” Therefore, TfL requests that transport be included in the Regulation 123 list so that, where appropriate, transport infrastructure can be funded to enable and support growth.

As TfL may have a key role in the delivery of projects in Havering, we would wish to work closely together in developing transport proposals, ensuring that current thinking on potential transport infrastructure projects and their funding is aligned. We also believe that there would be value in identifying a small number of transport schemes that could be funded or part funded through borough CIL receipts in order to support the growth proposed by the borough. It would be worthwhile exploring the potential for joint working and/or funding in some cases in order to bring forward certain schemes.

In respect of the Draft Infrastructure Delivery Plan and Infrastructure Funding Gap Report, I make the following observations:

i) Romford Station Crossrail Complementary Measures (CCM): TfL has funded LB Havering £1,667,500 through the CCM programme between 2015/16 and 2017/18 for interchange and public realm improvements at Romford station. This scheme (in terms of TfL CCM funding) has now completed and there is no future funding for this scheme.

ii) Bus stop accessibility: TfL's Bus Stop Accessibility programme has funded boroughs to deliver bus stop accessibility over recent years but that programme has now closed. TfL would expect that any new bus stop provision installed in the future would meet accessibility standards. It would be helpful to know the amount remaining to make up the £300k cost in the Table in Appendix 2 of the Infrastructure Funding Gap Report.

iii) Gallows Corner Junction: We are aware of LB Havering's aspirations in relation to Gallows Corner and there are ongoing discussions regarding this linked to the current review of the asset condition.

iv) Romford Ring Road Liveable Neighbourhood Scheme and Beam Parkway LIP Major Scheme: TfL is currently working with LB Havering on the above two schemes. Funding for implementation will be subject to modelling and scheme approvals, however, we would expect that the Romford scheme would be completed prior to 2021.

v) Tram/Light Rail Link: TfL suggest that the scope should be broadened to include high quality bus transit as well as rail modes.
I hope that you find these comments useful and please contact me if you wish to discuss anything further.

I would be grateful if you could note TfL's request to be notified of submission of your draft charging schedule for examination, publication of the examiner’s recommendation and approval of the charging schedule by the council.

TfL looks forward to working closely with you in ensuring that necessary transport infrastructure is prioritised and delivered in the borough.

Yours sincerely

[Signature]

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