



**Havering**  
LONDON BOROUGH

**Daniel Douglas**  
**Team Leader Transport Planning**  
**Planning**  
London Borough of Havering  
Mercury House  
Mercury Gardens  
Romford  
RM1 3SL

Mr Richard Allen  
Lead Member of the Examining Authority

[REDACTED]  
[REDACTED]  
[REDACTED]  
18<sup>th</sup> February 2021

[www.havering.gov.uk](http://www.havering.gov.uk)

Dear Sir,

**London Borough of Havering (20025659) – Responses to schedule of Changes to draft Development Consent Order (REP2-013).**

Thank you for the opportunity to respond to the schedule of changes to the draft Development Consent Order (dDCO) submitted at Deadline 2 by the Applicant (REP2-013). LB Havering would like to offer the following comments for the Examining Panel's (ExA) consideration.

LB Havering notes that the Applicant has made a series of changes to the language set out within a number of Articles including Articles 2, 8, 9,10,11 13, 14,15,16,23,24,28,29,32,35,36,38,39,44,48,49. LB Havering has no comments to make on any of these changes.

LB Havering further notes that the Applicant has made some amendments to Requirements set out in Schedule 2 of the dDCO. LB Havering would like to draw the attention of the ExA to the suggested amendment that is set out in Schedule 2 Requirement 4(2) (No 55 of REP2-013).

Following comments from the ExA contained within PD-008, the Applicant has amended the Requirement to include a series of management plans that will now be included as part of the CEMP. LB Havering is concerned that by including such documents as part of the CEMP, this will exclude them from the necessary scrutiny of the Examination.

Furthermore, including such documents only as part of the CEMP that will be produced post any decision by the Secretary of State to grant consent to the scheme, will mean that local planning and highways authorities will merely get consulted on the content of such documents and will not have any influence on agreeing them with the Applicant.

LB Havering considers this position very unsatisfactory and would invite the ExA to consider suggesting to the Applicant that such documents should be produced and made available as part of the Examination process.

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LB Havering would further invite the ExA to consider this issue from a matter of consistency. The Applicant has made available to LB Havering a draft Archaeological Management Plan (ACP), which is welcome and we look forward to discussing this further with the Applicant.

Furthermore, the Applicant has stated in response to Written Question GQ1.1 that an updated Outline CEMP will be submitted at Deadline 3a and that Appendix F will include outline plans for Air Quality, Noise and Vibration, Ecology and Trees Protection. Whilst details of these outcome plans will be welcome, there appears to be no indication as yet from the Applicant as to when further details of the other management plans set out in the applicant's suggested amendment to Schedule 2 Requirement 4 (2), will become available.

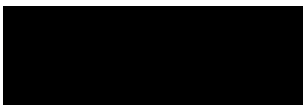
It remains the LB Havering's position that the production of a CEMP following any granting of the DCO by the Secretary of State is unacceptable due to the level of uncertainty that it brings the Local Authority and Scheduled 2 Requirement 4(1) should be amendment to secure a CEMP prior to consent being granted.

Finally, it is recognised that at this stage the Applicant will not have had the opportunity to consider the comments LB Havering has made with regards to the Draft DCO (APP-015).

LB Havering has provided comments on the dDCO in Section 24 of Havering's Local Impact Report (REP1-031). A number of matters have been raised concerning Articles and Requirements set out in the originally submitted Draft DCO (APP-015) and Havering looks forward to seeing these addressed in the next iteration of the dDCO to be submitted by the Applicant at Deadline 3B.

Thank you for the opportunity to comment on the schedule of Changes to the draft DCO. LB Havering will continue to support the ExA as this is explored further including at the Issue Specific Hearing scheduled for Friday 5<sup>th</sup> March.

Yours faithfully,

A black rectangular box redacting the signature of Daniel Douglas.

Daniel Douglas  
**Team Leader Transport Planning**