

M25 junction 28 improvement scheme

TR010029

9.86 Applicant's comments on the London Borough of Havering's Deadline 5 submissions

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M25 junction 28 scheme

Development Consent Order 202[x]

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1. Purpose and structure of this response

- 1.1.1 This document provides the comments of the applicant, Highways England, in response to the six documents the London Borough of Havering's submitted to the Examining Authority (ExA) on or before Deadline 5 (13 April 2021) namely their:
- Response to the Examining Authority's Further Written Questions (REP5 057)
 - Responses to the Applicant's response to the London Borough of Havering's Deadline 3b submission (REP5-058)
 - Response to the Applicant's response to Action points from ISH1 (REP5-059)
 - Response to the Applicant's response to Action points from ISH2 (REP5-060)
 - Response to the Updated draft Development Consent Order (REP5-061)
 - Comments on the Applicant's engagement (REP5-062).
- 1.1.2 Highways England has sought to provide comments where it is helpful to the Examination to do so, for instance where a representation includes a request for further information or clarification from Highways England or where Highways England considers that it would be appropriate for the Examining Authority (ExA) to have Highways England's views in response to a matter raised by an Interested Party in its representations. Where issues raised within a representation have been dealt with previously by Highways England, for instance in response to a question posed by the ExA in its first round of written questions or within one of the application documents submitted to the Examination, a cross reference to that response or document is provided to avoid unnecessary duplication. The information provided in this document should, therefore, be read in conjunction with the material to which cross references are provided.
- 1.1.3 Highways England has not provided comments on every point made within the representation (for instance, Highways England has not responded to comments made about the adequacy of its pre-application consultation given that Highways England has already provided a full report of the consultation it has undertaken as part of its application for the Development Consent Order (DCO)) and the Planning Inspectorate has already confirmed the adequacy of the pre-application consultation undertaken when the application was accepted for Examination. In some cases, no comments have been provided, for instance, because the written representation was very short, or because it expressed objections in principle to the Scheme or expressions of opinion without supporting evidence.
- 1.1.4 For the avoidance of doubt, where Highways England has chosen not to comment on matters raised by Interested Parties, this is not an indication Highways England agrees with the point or comment raised or opinion expressed.

REP5-057 London Borough of Havering Response to the Examining Authority's Further Written Questions

Question Number	Question	IP Response	HE Response
GQ 2.3	<p>At ISH1 [EV-009], LBH suggested that although they had recommended cross referencing be made in the outline CEMP to checks for bat roost features in any trees to be removed for management or safety requirements, no reference is made to bats in section 5 (tree works) of the outline Arboricultural Method Statement (AMS) submitted as Appendix F to the outline CEMP at Deadline 3A [REP3A-024]. Clarify where this topic is / will be addressed.</p>	<p>LB Havering understands that an updated outline Arboricultural Management Plan (AMS) will be submitted by the Applicant at Deadline 5. We look forward to reviewing the update to the outline AMS and providing a response on its adequacy at Deadline 6 to ensure that it addresses the inadequacies identified and secures the details recommended.</p>	<p>The updated Outline Arboricultural Method Statement (AMS) was submitted at Deadline 5 (REP5-040).</p>
AQ 2.3	<p>In response to the ExA's WQ1 AQ 1.10 [PD-008], the Applicant stated [REP2-011] that a qualitative dust assessment is standard practice and was carried out in accordance with the DMRB as explained at paragraph 5.5.4 of Chapter 5 of the ES [APP-027]. The DMRB requires a qualitative rather than a quantitative assessment, as does the Institute of Air Quality Management (IAQM) guidance (referred to in AQ.1.18) which uses a risk-based approach. Furthermore, in response to the ExA's WQ1 AQ 1.11 the Applicant stated that the methodology requires a qualitative assessment to be undertaken taking into account the nature of the construction activity and the location of sensitive receptors, but DMRB and IAQM guidance do not require the magnitude of impacts and significance of effect prior to implementation of mitigation to be categorised. The effects of any dust generated during construction should be mitigated, as described at paragraph 5.9.1 of Chapter 5 of the ES, with appropriate mitigation measures incorporated into the outline CEMP [REP3A-010]. The draft Statement of Common Ground (SoCG) between the Applicant and LBH submitted at Deadline 4 [REP4-004] indicates a position that the risk of the construction dust impacts should have been assessed and this is considered</p>	<p>The Applicant has provided an updated Dust, Noise Nuisance Management Plan (DNNMP), which includes a construction dust risk assessment, in line with the latest DMRB guidance LA105 air quality. Havering welcomes this addition, however the mitigation measures set out in table 3.2 of the DNNMP are provided only as examples of measures and therefore there is no commitment for any of these measures. Havering would expect to see the following additional elements in the DNNMP:</p> <ul style="list-style-type: none"> • Specific mitigation measures to address the Scheme's high dust risk potential (for receptors within 100m from construction activities), as per the risk assessment. The DMRB LA105 guidance states that 'The construction dust assessment shall be used to inform the best practice mitigation measures in the EMP depending on whether the project has a high or low dust risk potential'. The measures should therefore be linked to the risk assessment. • Specific measures to monitor mitigation effectiveness, including on and off site inspections, record keeping of complaints and/or other monitoring, as per table 2.108.1 of the above guidance. 	<p>The Applicant has provided a revised Outline Dust Noise Nuisance Management Plan (DNNMP) at Deadline 5 (Appendix F in the Outline CEMP, REP5-027) which has been updated to include a construction dust risk assessment in line with the latest DMRB LA105 guidance, as noted in Highways England's response to the Examining Authority's Further Written Question AQ2.3 (REP5-041). Table 3.2 of the Outline DNNMP (REP5-027) lists control measures that are likely to be implemented during construction taking into account the expected activities that will be taking place during the construction phase. These are based on measures that have been put into place on other similar types of projects with a "high" dust risk potential. Whilst the Principal Contractor will ultimately be responsible for the mitigation measures that are contained within the final CEMP, these must reflect the mitigation measures in the REAC and the CEMP must be substantially in accordance with the Outline CEMP, which includes the Outline DNNMP. Highways England must consult the relevant planning authority on the CEMP and management plans, and therefore were Havering at the time to consider that the DNNMP did not meet the necessary standard this can be raised in consultation and will be passed onto the Secretary of State who must ultimately approve the CEMP before the relevant works can commence. Measures to monitor mitigation effectiveness for projects with a "high" construction dust risk potential as noted in Table 2.108.1 of DMRB LA 105 have been added to the Outline DNNMP (see paragraph 3.5.3 of REP5-027). This is in accordance with DMRB LA 105 which states: <i>"Table 2.108.1 sets out the supporting activities that should be followed, based on the construction dust risk potential, to monitor the effectiveness of the proposed mitigation measures"</i></p>

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	<p>necessary, as it will be used as a basis for the selection of appropriate mitigation measures.</p> <p>Confirm the relative positions on this matter.</p>		
BHR 2.1	<p>At ISH2, the ExA asked the Applicant and LBH about the Environmental Plans to be submitted as part of the final CEMP in order to discharge Requirement 4 of the draft DCO [REP4-002]. While some of the listed plans in Requirement 4 are before the Examination, the majority are not. LBH considered all should be before the Examination. Transport for London (TfL) noted that if that were not feasible, the Ecological Habitats and Species Plan and Invasive Species Management Plan should be as they are related to the AMS.</p> <p>The ExA is of the view that if these plans are necessary for mitigation, particularly for significant environmental effects identified in the ES, then these <u>must</u> be submitted for the Examination in outline form so that it is clear that the mitigation will be secured as intended.</p> <ul style="list-style-type: none"> i. Provide a response or submit outline versions of the Ecological Habitats and Species Plan and Invasive Species Management Plan into the Examination. ii. Explain whether the draft DCO needs to be updated to either create separate requirements for these plans or ensure that the final versions are in accordance with the outline counterparts. 	<p>LB Havering would agree with point (ii) and would expect a separate requirement stating that the final management plans need to be in accordance with the outline counterparts.</p>	<p>Highways England does not consider an amendment is needed for the dDCO for the reasons set out in its response BHR 2.1 to the Examining Authority's further written questions (REP5-041).</p>
CA 2.3	<p>Following a request to do as Action Point 5 [REP4-018], the Applicant submitted a Gardens of Peace Muslim Cemetery Overlay Plan at Deadline 4 [REP4-020] in which it is demonstrated that Plot 1/8 would not extend over the burial plots.</p> <p>For the Applicant:</p> <ul style="list-style-type: none"> i. Explain how this plan is secured in the draft DCO [REP4-002] as a certified 	<p>LB Havering notes the submission by the Applicant at Deadline 4 of REP4- 018.</p> <p>LB Havering awaits confirmation of the views of the Gardens of Peace Cemetery and will update the ExA with regards to the Policy Compliance matter Havering has previously raised relating to the potential loss of burial plots, accordingly.</p>	<p>Please see response reference REP5-066-01 in Highways England's comments on the Gardens of Peace's response to the Examining Authority's Further Written Questions submitted at Deadline 6 (TR010029/APP/9.87).</p> <p>Highways England has provided a draft tri-party agreement with the Trustees of the Gardens of Peace (the Trustees) and Cadent Gas on 14 April 2021. Discussions are ongoing with regard to the draft agreement to satisfy all parties and Highways England is hopeful that an agreement will be reached by the end of the examination.</p>

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	<p>document and whether it forms would form part of the Land plans [REP3A-003].</p> <p>For the Gardens of Peace Muslim Cemetery:</p> <p>ii. Respond to the Gardens of Peace Muslim Cemetery Overlay Plan submitted at Deadline 4 [REP4-020].</p>		
DCO 2.2	<p>Comment on the wording in the draft DCO submitted at Deadline 4 [REP4- 002] where new Requirement 11 has been inserted in respect to the AMS.</p>	<p>The Council remains concerned that the wording for Requirement 11 included the phrase “substantially in accordance with”. LB Havering has raised this concern in respect of other management plans and remain of the view that the word “substantially” should be removed in such cases.</p> <p>The current wording provides no surety for the Council that the final AMP will be in accordance with the draft AMS and leaves the risk of changes being made by the Appointed contractor.</p>	<p>Highways England maintains the position regarding the use of the term ‘substantially in accordance with’ as set out in Highways England’s response to the Examining Authority’s Written Question DCO 1.26 (REP2-011) and response to the London Borough of Havering’s Deadline 4 submission (see response reference REP4-029-04 in REP5-042).</p> <p>Moreover, in response to the LB of Havering’s LIR (REP31-020) (Table 2-1, paragraph 24.2.1- 24.2.4), the term “substantially in accordance with” is both proportionate and precedented in development consent orders. This phrase has been included in the recently made A38 Derby Junctions DCO (2021), A1 Birtley to Coal House DCO (2021) and A303 Sparkford to Ilchester Dualling DCO (2021).</p> <p>On the A1 Birtley to Coalhouse scheme the Examining Authority and Secretary of State expressly agreed with Highways England that the term ‘substantially in accordance with’ was appropriate. Paragraph 34 of the Secretary of State’s decision letter states (note HE in the below refers to Historic England):</p> <p><i>34. The only outstanding matter not agreed was the wording of Requirement 9 concerning the Final Written Scheme of Investigation (“FWSI”) in relation to archaeological remains. HE’s preference is for the words “in accordance with” rather than “substantially in accordance with” to be included in that requirement. HE states that this is not so rigid as to prevent opportunities to accommodate potential implications of design changes should this be appropriate (ER 9.6.26). The Applicant states that “substantially in accordance with” achieves the desired aims of both parties by providing an appropriate amount of certainty and flexibility given the potential for slight variations at detailed design, for example in relation to drainage at Bowes Railway and access to the SM (ER 9.6.27). The ExA note that the FWSI would need to be submitted for the approval of the Secretary of State in consultation with both the relevant planning authority and HE. This approval of the final details will ensure that archaeological interests potentially affected by the Development, including the Bowes Railway SM, would be appropriately protected. The ExA are therefore satisfied with the inclusion in Requirement 9 of “substantially in accordance with”, as set out the Revised DCO (ER 9.6.28). The Secretary of State agrees.</i></p> <p>TR010031_Secretary of State Decision Letter (planninginspectorate.gov.uk)</p>

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FDW 2.2	<p>Comments on the adequacy of the outline SuWMP provided at Deadline 3A as an appendix to the outline CEMP [REP3A-010].</p>	<p>As a Local Lead Flood Authority LB Havering is generally satisfied with the SuWMP.</p> <p>The SuWMP covers the construction phase of the works and is an outline document – it covers the main points and forms framework for the detailed document to be provided by the contractor.</p> <p>LB Havering would reiterate the point that has been made in regard to the other management plans and would expect the final SuWMP to be in accordance with the outline SuWMP.</p> <p>The mitigation measures for the impact of scheme appear to have been addressed.</p> <p>LB Havering would suggest that there is an opportunity for improving catchment control for these areas, attenuation etc to provide some additional flood protection to areas downstream such as Romford or Rainham.</p>	<p>An updated Outline Surface Water Management Plan (SuWMP) was submitted at Deadline 5 (Appendix F, REP5-027) which covers the long term maintenance measures. Highways England is required to consult with the local planning authority pursuant to Requirement 4 of the dDCO (TR010029/APP/3.1(5)).</p>
HE 2.1	<p>At ISH1 [EV-009], the adequacy of the Archaeological Management Plan (AMP) submitted at Deadline 3 [REP3A-029] was discussed. LBH and the Greater London Archaeology Advisory Service (GLAAS) expressed concerns that trial trenching was not undertaken to inform the conclusions reached in the AMS. In response to Action Point 7 [REP4-021], the Applicant stated that a programme of works for trial trenching has been agreed with the LBH / GLAAS which is targeted for May 2021; and an updated outline AMP will be submitted at Deadline 5.</p> <p>In its response at Deadline 4, LBH / GLAAS stated [REP4-029] that an additional Requirement should be inserted into the draft DCO [REP4-002] which secures <i>“trial trenching, pre commencement of the scheme, to ensure that the Archaeological Management Plan is effective in dealing with archaeological sensitive areas that have not been assessed through baseline field work for this scheme”</i>.</p>	<p>LB Havering confirms that a programme of works has been agreed with the Applicant for Archaeological trial trenching with a target date for May 2021.</p> <p>LB Havering would like to see trial trenching take place to inform the DCO Examination process.</p> <p>LBH is concerned that this may not take place because of a number of underlying factors making the timetable uncertain, most notably being accessing the land and the procurement process.</p> <p>Should the Trial Trenching not take place during the Examination process the Council would consider the additional requirement to still be necessary.</p>	<p>Highways England can confirm that the archaeological investigation programme is being progressed in accordance with the programme presented to London Borough of Havering, and it is still envisaged that these trial trenching works will be completed before the end of May 2021 to inform the Examination.</p> <p>Highways England has reached an agreement on the archaeology matters and this will be outlined in the updated Statement of Common Ground (SoCG) with London Borough of Havering to be submitted at Deadline 7 (18 May 2021).</p>

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	<p>Explain why an updated AMS, secured by Requirement 9 of the draft DCO is incapable of ensuring the above would be secured.</p>		
<p>LV 2.4</p>	<p>At the ISH1, the Applicant clarified that the outline Landscape and Ecological Management and Monitoring Plan (LEMP) contains the strategy and approach for tree replacement and mitigation, whereas construction effects including the identification of tree loss and protection are covered in the outline CEMP [REP3A-010].</p> <p><u>For LBH and Natural England:</u></p> <p>i) Comment on the adequacy of the outline LEMP in respect to the strategy, approach, quality and quantity of species to be replaced and their long-term management.</p> <p><u>For the Applicant:</u></p> <p>ii) Confirm whether the outline LEMP is to be updated at Deadline 5, alongside the outline AMS which will also reflect Change Request 2 which was accepted into the Examination on Friday 19 March 2021 [PD-013], especially in respect to the environmental bund planting strategy and approach.</p>	<p>Generally LB Havering is satisfied with the proposals put forward with the Outline LEMP. However, LB Havering provided comments last year on the draft outline LEMP prior to the document being submitted to PINS and gave recommendations for management technique and species changes. LB Havering has since reviewed the submitted Outline LEMP (Appendix 7.16) and the following considerations have not been taken into consideration:</p> <ul style="list-style-type: none"> • Para. 5.1.10 discusses the initial thinning of the new woodland. LBH advised that thinning is undertaken in the third year following woodland planting. This should be a thorough formative prune of the developing trees (reaching heights between 1-2.5 metres) to prevent against the formation of co-dominant leading stems that would eventually result in weaker, smaller and potentially hazardous trees. Depending on the rate of tree development, a further thinning of the new woodland would then be undertaken between 5 and 8 years following planting (as stated in the Outline LEMP), removing 10 to 15% of stock to encourage the broadening spread of the crowns, and again 15 to 20 years after planting for the same result. • The illustrative species mix for hedgerow planting is provided in Table 5.7. We would ask that this is amended to include the following species mix: <ul style="list-style-type: none"> ▪ Hawthorn <i>Crataegus monogyna</i> (45%) ▪ Field Maple <i>Acer campestre</i> (20%) ▪ Blackthorn <i>Prunus spinosa</i> (15%) ▪ Hornbeam <i>Carpinus betulus</i> (10%) ▪ Hazel <i>Corylus avellane</i> (10%) <p>Hedgerows should be planted in double staggered rows with about 15 to 20 cm between the rows and 30 to 35 cm between the plants.</p> <p>It's also worth noting that no specification for spiral guards has been provided at this stage. However, to reduce the use of standard plastics we would expect biodegradable guards to be used. Given many of the</p>	<p>A revised Outline LEMP will be submitted at Deadline 7 (18 May 2021). This will reflect Change Request 2 and take into account London Borough of Havering's comments on some of the details set out in the Outline LEMP. There original comments were received post submission of the application and Highways England confirms that the matters raised in these comments will be incorporated in the next iteration of the LEMP (at Deadline 7).</p>

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		<p>products on the market need to be removed and composted in industrial facilities to biodegrade, LBH would also have a preference for plastic free guards where possible, as these do not necessarily have to be removed at the end of their lifespan.</p>	
<p>LV 2.8</p>	<p>In its response to Action Points 12, 13 and 14 [REP4-021] from ISH1 [EV-009], the Applicant stated that an update to the outline AMS will be submitted at Deadline 5, Tuesday 13 April 2021. The ExA expects the updated document to address some of the identified inadequacies in respect to identification of lost Tree Preservation Order (TPO) trees and protection measures of ancient and mature woodlands, TPO trees and veteran trees.</p> <p>Provide a response on the adequacy of this document at Deadline 6, Tuesday 27 April 2021.</p>	<p>LB Havering looks forward to reviewing the update to the outline AMS and providing a response on its adequacy at Deadline 6 to ensure that it addresses the inadequacies identified and secures the details recommended.</p>	<p>The updated Outline AMS was submitted at Deadline 5 (REP5-040).</p>
<p>NV 2.2</p>	<p>In its response at Deadline 4, LBH stated [REP4-029] that an additional Requirement should be inserted into the draft DCO [REP4-002] " to provide surety that residents are protected from noise during construction [because] the Applicant has not provided surety from its responses through the Examination that the matter of noise disruption during construction has been adequately dealt with".</p> <ol style="list-style-type: none"> i. Explain why Requirement 4 of the draft DCO [REP4-002] is incapable of ensuring the above would be secured. ii. Explain how the outline Dust, Noise and Nuisance Management Plan would need to be updated to address the concerns raised. 	<p>Requirement 4 as it is currently worded in the draft DCO does not provide the local authority with the surety that residents will be adequately protected from noise.</p> <p>Table 6.20 of Chapter 6 of the Environmental Statement (ES) states the residents that will be affected by construction noise after the mitigation measures in Section 6.9 of the ES have been implemented. Table 6.12 sets out the potential impact of night time construction noise and identifies Grove Farm as having an "Adverse effect" which LB Havering would consider to still be a potential disturbance. Whilst it is recognised that a motorway barrier has been identified as mitigation from noise for Grove Farm, LBH would suggest that the DNNMP needs to be updated to ensure temporary barriers are placed as all receptor sites if possible. This also needs to be a commitment in the REAC.</p> <p>In addition all works that evoke an adverse and significant adverse impact at a receptor should be accompanied with a specific S61 agreement so LB Havering knows the duration and likely noise levels, mitigation measures etc.</p>	<p>Highways England discussed the noise and vibration assessment in detail with London Borough of Havering (see page 40, section 12, of the SoCG submitted at Deadline 4 (REP4-004) and it has been agreed that the noise and vibration assessment is appropriate, including the noise mitigation measures specified in the REAC (REP5-028).</p> <p>Highways England provides further information on the points raised here by London Borough of Havering.</p> <p><u>Grove Farm matters</u></p> <p>It is agreed that there is potential for disturbance from adverse construction noise effects.</p> <p>The inclusion of a noise barrier for road traffic noise at Grove Farm is not agreed. Highways England's position is that a permanent noise barrier is not required to mitigate the negligible changes in road traffic noise predicted to be experienced at Grove Farm once the Scheme is operational.</p> <p><u>Mitigation approach (temporary noise barriers)</u></p> <p>The ES and REAC already include for temporary noise barriers for construction impacts identified as significant adverse effects (NV0.1 and NV2.1 in the REAC – REP5-028). Temporary noise barriers would not be proposed for receptors which do not have significant adverse effects.</p> <p><u>Section 61 application</u></p>

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		<p>LB Havering would also recommend attended sound monitoring periodically for the adverse impact residents and full unattended monitoring at Grove Farm. This is because night-time disruption must be kept to a minimum and trigger level exceedances should be acted on immediately and appropriately.</p>	<p>As detailed in the Outline DNNMP (Section 2.3.4 in Appendix F.1 of the Outline CEMP – REP5-027), applications for prior consent under Section 61 of the Control of Pollution Act are only expected to be used for activities which are planned to take place outside the periods of normal working hours, as detailed in section 5.3 of the Outline CEMP (REP5-027).</p> <p><u>Noise monitoring and community liaison</u></p> <p>The Outline DNNMP includes a section on noise monitoring (Section 2.6 of Appendix F.1 of the Outline CEMP – REP5-027) and covers community engagement (Section 2.9 of Appendix F.1 of the Outline CEMP – REP5-027).</p> <p>The noise monitoring section will be updated for the purposes of the final version of the CEMP by the Principal Contractor once the locations and timing of noise monitoring have been agreed in consultation with the local authorities, and the responsibilities for agreed actions resulting from that noise monitoring defined.</p> <p>Similarly, the People and Communities section of the REAC (PC0.1 and PC0.5 in REP5-028) confirms that a communications plan will provide a method for affected people to contact the project team, within the CEMP (Section 3 – REP5-027), defining the roles and responsibilities in the event of any complaints, in line with the outline Dust, Noise and Nuisance Management Plan.</p>
TA 2.4	<p>An outline TMP was submitted by the Applicant at Deadline 4 [REP4-013]. The ExA notes that the outline TMP does not appear to address the impact of temporary closures to the A12 eastbound off slip to junction 28 and any associated diversions during construction work. For the Applicant:</p> <p>i) Confirm that temporary closures are no longer considered necessary for this section of road. If this is not the case indicate where the diversion caused by such a closure is described in the outline TMP.</p> <p>For Interested Parties:</p> <p>ii) Comment on the outline TMP.</p>	<p>The OTMP as drafted does not seek closure of the A12 eastbound off-slip on a temporary basis. The issue for the LB Havering is that the OTMP commentary is not supported by the necessary wording in the updated draft DCO or the outline CEMP. LB Havering has already made comment at Issue Specific Hearings One and Two in respect of the need for certainty in the management of scheme construction and how the certified documentation must support this outcome.</p> <p>At this stage, unless the OTMP proposal is backed by satisfactory wording within the dDCO and Outline CEMP LB Havering maintains its objection to any opportunity for closure of the A12 eastbound off slip at junction 28.</p>	<p>Please refer to Highways England's response to the Examining Authority's Further Written Question TA 2.4 (REP5-041). The Outline Traffic Management Plan (TMP) will be updated to include temporary overnight road closures and will be submitted at Deadline 7.</p> <p>The Outline TMP is supported by the dDCO in that requirement 10 requires the final version of the plan to substantially accord with the outline version and no doubt the Secretary of State would only be prepared to approve the final version if he is satisfied that this is the case.</p>
TA 2.5	<p>The ExA notes the Petersfield Avenue vehicle swept path analysis submitted in Appendix E of the outline TMP [REP4- 013] and observes that</p>	<p>LB Havering concurs with the applicant's analysis and the ExA view that the A12 / Petersfield Avenue junction is not appropriate on safety grounds for HGV u-turns and poses</p>	<p>The proposed construction lorry routes to and from the works sites for construction of the Scheme are described in Section 2.3 of the outline TMP (REP4-013). Highways England's Principal Contractor will notify all</p>

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	<p>this analysis appears to show that articulated vehicles carrying out the proposed u- turn will mount the kerb before (or while) crossing the eastbound carriageway.</p> <p><u>For the Applicant:</u></p> <p>i) Confirm whether the ExA's interpretation of the swept path analysis is correct.</p> <p><u>For Interested Parties:</u></p> <p>ii) Comment on the appropriateness of the proposed u-turn manoeuvre based on the swept path analysis.</p>	<p>the risk of damage to the public highway and street furniture.</p> <p>The matter concerning LB Havering is how the applicant intends to police this limitation on movement. The Applicant in the OTMP offers no HGV management strategy, routing guide or contractor penalties for non-compliance beyond general recognition that HGV construction traffic would need to use the congested Gallows Corner A12 / A127 roundabout junction.</p> <p>LB Havering is therefore of the viewpoint that the Outline TMP as drafted is inadequate in both content and commitment to the management of HGV construction traffic.</p>	<p>suppliers of construction materials and equipment of the construction lorry routes to be used when placing orders, explaining that no other routes are to be used by construction delivery vehicles. Temporary signage on the road network will be installed directing construction delivery vehicles along the designated lorry routes. Arrangements for the temporary signage will be set out in the final TMP to be submitted to the Secretary of State for approval under Requirement 10 of the dDCO.</p> <p>Should local residents or the local authorities become aware of construction traffic associated with the Scheme not following the designated construction lorry routes, then they will be able to raise the issue with Highways England's appointed Principal Contractor and appropriate action will be taken to prevent further instances.</p> <p>Highways England maintains that the information contained in the outline TMP is appropriate for the current status of the Scheme and on the basis that more detail will be provided in the final TMP which it must consult the relevant highway authority on before seeking approval from the Secretary of State.</p> <p>Requirement 10 (2) requires the approved version of the TMP to be adhered to.</p>
TA 2.6	<p>In its response to Action Point 2 [REP4- 026] of ISH2 [EV-010], the Applicant declined to delete Part 3, Article 18(2)(c) which authorises the use as a parking place on any road. The Applicant confirms that Woodstock Avenue would not be used for operative or construction parking.</p> <p>Confirm whether the outline TMP [REP4-013] contains within it a construction parking strategy for operatives and / or identifies which of the surrounding road network would be used under this Article in the draft DCO [REP4-002].</p>	<p>LB Havering is disappointed to note that the applicant has failed to address this issue at its source in the revised dDCO.</p> <p>The Outline Traffic Management Plan provides no clarity as to whether any off site parking may be necessary, to support the construction activity, its location, nor to its management should it be required.</p> <p>As the Applicant and contractor is committed through the DCO to establishing significant temporary works , LB Havering remain of the view that formal off-site parking for construction operatives and plant is unnecessary and therefore invites the ExA to recommend that the associated wording be removed from the recommended DCO.</p>	<p>Please refer to Highways England's response to the Examining Authority's Further Written Question TA 2.6 (REP5-041).</p> <p>In regard to off-site parking, Highways England maintains the position set out in the response to Action point 2 of Highways England's Response to Actions from ISH 2 (REP4-026) and would reiterate that this is a well preceded provision and reference to 'authorise the use as a parking space of any road' is in every Highways England DCO.</p>

REP5-058 London Borough of Havering response to Applicant at Deadline 5

Response reference:	Representation Issue	HE Response s
REP5-058-01	<p>Havering notes the comments made by Highways England (HE) (REP4-010) concerning Havering's Deadline 3B submission and would like to offer the following comments:</p> <p>Policy Compliance</p> <p>REP3B-006-1</p> <p>LB Havering updated its position with regards to Policy 22 of the emerging Local Plan at Deadline 4 (REP4-031) stating that should the Applicant produce a Local Training Skills and Job Brokerage Strategy as is required in Policy 22 of the emerging Local Plan, LB Havering would consider the scheme to be in compliance with this policy.</p>	<p>Highways England has previously set out its position on this matter in Highways England's response to the London Borough of Havering Deadline 3b submission (REP4-010). In that response, Highways England explained that Policy 22 is self-evidently not applicable to this particular Scheme. Highways England welcome a response from LB Havering if they consider otherwise.</p>
REP5-058-02	<p>REP3B-006-2</p> <p>LB Havering notes that the Applicant has submitted at Deadline 4 (REP4-020) an Overlay of Works Plan showing Plot 1/8 and the burial plots at the Gardens of Peace Cemetery. It is further noted that draft Heads of Terms have been sent to the Gardens of Peace Trustees. Should the Trustees be satisfied with the information provided, LB Havering would consider that the scheme is in compliance with LDF policies CP8 and DC27.</p>	<p>Please see Highways England response to Gardens of Peace's response to ExAWQ2 submitted at Deadline 6 (TR010029/APP/9.87). Highways England provided a draft tri-party agreement with the Trustees of the Gardens of Peace (the Trustees) and Cadent Gas on 14 April 2021. Discussions are ongoing with regard to the draft agreement to satisfy all parties and Highways England is hopeful that an agreement will be reached by the end of the examination.</p>
REP5-058-03	<p>REP3B-006-3</p> <p>It is not considered appropriate for the Applicant to site a scheme that is being progressed outside of the DCO process through Designated Funds as reasoned justification for the scheme being compliant with the Council's sustainable travel policies.</p> <p>Furthermore it is concerning that despite the Applicant's reassurances that funding for the NMU is being pursued through the Designated Funds process, host local authorities have been approached to establish whether any financial contribution can be made to the project. LB Havering considers that it is the responsibility of the Applicant to develop a scheme that is compliant with local authority planning policies, and it should not be for host local authorities to have to make a financial contribution towards this.</p> <p>LB Havering further notes in the Applicant's response to ISH2 Action Points (REP4-026) that it is not the current intention of the applicant to incorporate the NMU scheme within the draft DCO itself. LB Havering would encourage the applicant to reconsider this position.</p> <p>It is also noted within REP4-026 in response to Action Point 9 that the Applicant is considering the inclusion of a footway/cycle link provision from Brook Street through</p>	<p>Highways England has previously set out its stance with regard to the approach to NMU's and the provision of improvements at junction 28 as part of a wider NMU improvement scheme through the Designated Funds scheme in response to Action 9 of Highways England's to action points from ISH2 (REP4-026).</p>

Response reference:	Representation Issue	HE Response s
	the circulatory. Havering would welcome this and such a provision would support Policies CP9 and CP10.	
REP5-058-06	<p>REP3B-006-6</p> <p>LB Havering maintains its position as set out in (REP3B-006) that the Applicant should make additional efforts to engage with the residents of the Putwell Bridge Caravan Park.</p> <p>The Council considers it unacceptable that the most recent communications with the residents have been made in written form, and has made a separate submission at Deadline 5 on this matter.</p>	Refer to Highways England's response to the Rule 17 request for further information, submitted at Deadline 6 (TR010029/EXAM/9.94).
REP5-058-08	<p>REP3B-006-10</p> <p>LB Havering put forward a suggested amendment to clauses 13, 18, 19 and 22 with regards to Deemed Consent and this was reiterated within the Written Statement of Oral Submissions (REP4-031). It was noted at ISH2 that the Panel would consider the matter. Havering maintains the position as set out in REP4-031.</p>	Please refer to paragraph REP4- 031-26 of Highways England's response to London Borough of Havering Deadline 4 submissions (REP5-042) for its position on this matter.
REP5-058-09	<p>Traffic assessment and traffic modelling</p> <p>REP3B-006-11</p> <p>LB Havering maintains its position as set out at ISH1 and confirmed in its Written Statement of Oral Submissions (REP4-031) that Gallows Corner should be included within the operational traffic model.</p>	This matter is responded to in paragraph REP3B-006-11 of Highways England's response to the London Borough of Havering Deadline 3b submission (REP4-010). Highways England also explained their position as set out as agenda item 2.2 in the written submission of Highways England's case put orally at Issue Specific Hearing 1 (REP4-016).
REP5-058-10	<p>REP3B-005-12</p> <p>LB Havering welcomes the production of a draft outline Traffic Management Plan at Deadline 4. LB Havering will comment further on this in response to Written Question TA 2.4, to be submitted at Deadline 5.</p>	No response required.
REP5-058-11	<p>REP3B-006-13</p> <p>LB Havering maintains its position with regards to a Code of Construction Practice (CoCP) and that precedent has been set for such as document being prepared and included as part of the Examination. A clear example of this is the draft Code of Construction Practice that has been produced by the Applicant for the Lower Thames Crossing project.</p>	<p>Highways England have previously addressed the matter of a CoCP in REP2- 011 and further explained at the first Issue Specific Hearing (ISH1) noted in paragraphs 3.1.38 to 3.1.39 of the Written submission of Highways England's case put orally at ISH1 (REP4-016).</p> <p>Notwithstanding this, a signposting document was prepared by Highways England and submitted at Deadline 5 (REP5-052) that demonstrates the interdependencies between the Outline CEMP, REAC, CEMP, Handover Environmental Management Plan (HEMP) and the Outline Traffic Management Plan (TMP) and the TMP.</p>
REP5-058-12	<p>Applicant's response to Planning Obligations REPB3B-006 15</p> <p>With regards to the Applicant's comments on the Examination of the Havering Local Plan, it is important to note that the emerging Local Plan has been through an</p>	Highways England has given due consideration to the policies within the emerging Local Plan. However, in regard to Policy 22 please refer to paragraph REP5-058-01 above which explains why it is not relevant to the Scheme.

Response reference:	Representation Issue	HE Response s
	<p>Examination in Public and been through a further round of consultation on Main Modifications.</p> <p>There has been no request by the Planning Inspector for the need for a Main Modification to Policy 22, and therefore we anticipate that it will be adopted its current form in due course. The Council considers that, significant weight should therefore be afforded to this policy.</p> <p>Furthermore LB Havering would bring to the ExA attention Policy E11 Skills and Opportunities for all contained within the recently published London Plan. LB Havering considers that the production of a Local Training Skills and Job Brokerage Strategy would ensure that the Applicant meets policy requirements of both the adopted London Plan and emerging Havering Local Plan.</p> <p>With regards to the other Planning Obligations, Havering has submitted an updated position on these at Deadline 4 (REP4-031) which sets out the reasoned justification for such obligations</p>	<p>In regard to the other planning obligations, Highways England maintains its position as set out in response to the London Borough of Havering Deadline 3b submission (REP4-010).</p>

REP5-059 Response to the Applicant's response to Action Points from ISH1

Response reference:	Representation Issue	HE Response
REP5-059-01	<p>Action Point 4</p> <p>It is noted that the Applicant is looking to secure funding for the Non-Motorised User (NMU) route through Highways England Designated Funds process. Whilst it is noted that the outcome of this process will be known by Deadline 9, LB Havering maintains its position that such a route should be secured through the DCO itself.</p>	<p>Please refer to the response to Action 9 of Highways England's to action points from ISH2 (REP4-026).</p>
REP5-059-02	<p>Action Point 7</p> <p>LB Havering welcomes that the draft Archaeological Management Plan has been updated since the Examination Hearings. GLASS on behalf of LB Havering has provided further comments to the Applicant. A number of matters have been resolved with the Applicant in the most current version, submitted at Deadline 5, most notably how detailed complex remains will be dealt with, and the protocol for unexpected significant discoveries in evaluation. Discussions will continue with the Applicant to resolve these matters</p> <p>Whilst the timetable for the initial trial trenching is welcome, the Council remains concerned that there are a number of variables that will need to be met if this timetable is to be achieved and for trial trenching to take place during the Examination in May 2021.</p>	<p>Highways England can confirm that the archaeological investigation programme is being progressed in accordance with the programme presented to London Borough of Havering, and it is still envisaged that these trial trenching works will be completed before the end of May 2021 to inform the Examination.</p> <p>Highways England has reached an agreement on the archaeology matters and this is outlined in the updated SoCG with London Borough of Havering submitted at Deadline 7.</p>
REP5-059-04	<p>Action Point 11</p> <p>Whilst the Applicant has agreed with Natural England (NE) that neither Alder Wood nor The Grove meet the definition of Ancient Woodland, the description provided of these woods fits the criteria for Priority Mixed Deciduous Woodland habitat which is relevant to the ExA assessment of the proposal.</p> <p>LB Havering suggests that it would therefore provide clarity if the Applicant could use this term wherever it is appropriate and only use "mature woodland" where woodland does not meet any defined designation for this habitat.</p>	<p>Highways England provided a clarification on the correct terminology used in the biodiversity and landscape Environmental Statement (ES) chapters in response to ISH1 action point 11 (REP4-021). Therefore, Highways England considers that the ES uses the appropriate terminology and therefore no updates are needed.</p>

REP5-060 London Borough of Havering Response to the Applicant's response to Action Points from ISH2

Response reference:	Representation Issue	HE Response
REP5-060-01	<p>Action Point 2</p> <p>The Applicant's response does not give LB Havering the surety it needs that residents on local roads, or any road in the borough will not be impacted by the parking of construction vehicles. LB Havering maintains the position set out at ISH2 and in the Written Statement to Oral Submissions (REP4-031) that the Article 18 (2c) is not appropriate. Reference should be made to "roads within the red line boundary" to provide surety to the residents of Havering as to which roads may be affected.</p> <p>LB Havering welcomes the revision to Part Two Procedure for Discharging Requirements Requirement 18 to reflect that consultation comments will be submitted to the Secretary of State in full and this addresses the concerns previously raised by LB Havering as to how final Management Plans will be approved.</p>	<p>Highways England maintains the position set out in the response to Action point 2 of Highways England's Response to Actions from ISH2 (REP4-026) and would reiterate that this is a well precedented provision and reference to 'authorise the use as a parking space of any road' is in every Highways England DCO.</p>
REP5-060-02	<p>Action Point 6</p> <p>LB Havering maintains its position concerning S106 agreements and will be responding to the Applicants comments (REP4 – 010) at Deadline 5.</p> <p>Havering put forward a request for an additional requirement at Deadline 3b (REP3B) and Deadline 4 (REP4-029) to ensure that residents are adequately protected from noise during construction. The request for this additional requirement remains and further information will be provided in Havering's response to the updated draft DCO at Deadline 5.</p>	<p>Highways England maintains the position set out in paragraph REP4- 029-01 of the response to London Borough of Havering Deadline 4 Submissions (REP5-042).</p>
REP5-060-03	<p>Action Point 9</p> <p>LB Havering welcomes the comment made by the Applicant to include additional works implemented through the DCO that would see a new shared footway/cycleway link on the Brook Street approach to the circulatory and through the circulatory itself.</p> <p>However it is unclear whether this would address the concerns LB Havering has previously made within its Local Impact Report with regards to the uncontrolled crossing points on the M25 Southbound on-slip and the A12 westbound on-slip.</p> <p>Whilst the improvements set out by the Applicant for the circulatory itself would be of benefit to Non-Motorised Users, LB Havering maintains a preference for the Non- Motorised Route currently being progressed by the Applicant through Designated Funds to be secured through the DCO itself.</p>	<p>The comments raised in the Local Impact Report (LIR) with regards to the uncontrolled crossing point on the M25 Southbound on-slip would be addressed through the Designated Funds application which Highways England has made reference to. Highways England's position with regards to this Designated Funds application is set out in response to Action 9 of Highways England's to action points from ISH2 (REP4-026).</p>

REP5-061 London Borough of Havering Response to the Updated draft Development Consent Order

Response reference:	Representation Issue	HE Response
REP5-061-01	<p>submitted at Deadline 4 (REP4-009)</p> <p>Following on from the Applicant's submissions for Deadline 4, LB Havering wishes to comment on the revisions to the draft DCO.</p> <p>On review of the revisions to the Draft DCO Havering would like to iterate the points it made to the Examining Authority following on from the submissions for Deadline 3B (REP3B-006) and at Deadline 4 (REP4-029).</p> <p>LBH still holds the view that additional Requirements, as set out in its letter are still required:</p> <ul style="list-style-type: none"> i) To the lack of certainty in the ability of the Applicant to secure access onto the land to carry out the necessary trial trenching that will ensure that the Archaeological Management Plan is effective in dealing with the archaeological sensitive areas that have not been assessed through the baseline field work. ii) To protect its residents from noise during construction. The Applicant has provided no further surety to Havering that they commit to and back up in S61 agreements (with details actions for the treatment) for Grove Farm, Maylands Cottages, Gardens of Peace, Putwell Bridge Caravan Park, 17 Colchester Road and 12 Craven Garden. 	<ul style="list-style-type: none"> i) Highways England can confirm that the archaeological investigation programme is being progressed in accordance with the programme presented to London Borough of Havering and it is still envisaged that these trial trenching works will be completed before the end of May 2021 to inform the Examination. Highways England has reached an agreement on the archaeology matters and this will be outlined in the updated SoCG with London Borough of Havering submitted at Deadline 7. ii) The Outline CEMP provides the details of the measures to be implemented to mitigate construction noise. Paragraphs 5.3.1 to 5.3.3 in the Outline CEMP (TR010029/APP/7.2(3)) explain that for any noisy activities outside the listed daytime and night time working hours, a Section 61 application will be made to the local authority under the Control of Pollution Act 1974. Highways England therefore does not consider that a separate requirement is needed as Requirement 4 and the CEMP already requires Section 61 applications to be made in certain instances.
REP5-061-02	<p>LB Havering is disappointed that the Applicant has not taken up the Examining Authority's proposals for two additional Requirements to support the provision of an inter-green and the proposed wider NMU route in the vicinity of M25/J28. Havering still supports the proposal for these two Requirements.</p> <p>LB Havering remains concerned that Requirement 4 and 9 retains the wording "substantially in accordance with". The revised Requirement 10 Traffic Management also includes the phrase "substantially in accordance with" as does the new Requirement 11 Trees. Havering wishes to see this phrase removed from all Requirements in the Draft DCO. If the word "substantially" was removed from these Requirements then LBH would be in a position to remove its objection to these Requirements.</p>	<p>Highways England updated the draft DCO at Deadline 6 (TR010029/APP/3.1(5)) to include a requirement to secure traffic operations on the junction 28 roundabout.</p> <p>Regarding the position of NMUs, Highways England maintains the position as set out in its response to Action 9 of Highways England's response to action points from ISH2 (REP4-026).</p> <p>Regarding "substantially in accordance with" Highways England maintains the position set out to the ExA in paragraph DCO 1.26 of the Response to Written Questions (REP2-011) and in response to the LB of Havering's LIR (REP31-020). (Table 2-1, paragraph 24.2.1- 24.2.4). The term "substantially in accordance with" is both proportionate and precedented in development consent orders. This phrase has been included in the recently made A38 Derby Junctions DCO (2021), A1 Birtley to Coal House DCO (2021) and A303 Sparkford to Ilchester Dualling DCO (2021).</p> <p>In fact, on the A1 Birtley to Coalhouse scheme the Examining Authority and Secretary of State expressly agreed with Highways England that the term 'substantially in accordance with' was appropriate. Paragraph 34 of the Secretary of State's decision letter states (note HE in the below refers to Historic England):</p> <p><i>34. The only outstanding matter not agreed was the wording of Requirement 9 concerning the Final Written Scheme of Investigation ("FWSI") in relation to archaeological remains. HE's preference is for the words "in accordance with" rather than "substantially in accordance with" to be included in that requirement. HE states that this is not so rigid as to prevent opportunities to accommodate potential implications of design changes should this be appropriate (ER 9.6.26). The Applicant states that "substantially in accordance with" achieves the desired aims of both parties by providing an</i></p>

Response reference:	Representation Issue	HE Response
		<p><i>appropriate amount of certainty and flexibility given the potential for slight variations at detailed design, for example in relation to drainage at Bowes Railway and access to the SM (ER 9.6.27). The ExA note that the FWSI would need to be submitted for the approval of the Secretary of State in consultation with both the relevant planning authority and HE. This approval of the final details will ensure that archaeological interests potentially affected by the Development, including the Bowes Railway SM, would be appropriately protected. The ExA are therefore satisfied with the inclusion in Requirement 9 of “substantially in accordance with”, as set out the Revised DCO (ER 9.6.28). The Secretary of State agrees.</i></p> <p>TR010031_Secretary of State Decision Letter (planninginspectorate.gov.uk)</p>
REP5-061-03	LB Havering notes that the Outline Traffic Management Plan (OTMP) is not listed in Requirement 4 (2) and questions if this is an omission or drafting error.	Requirement 4 lists the management plans that are to be produced as part of the CEMP. As Traffic Management has its own Requirement – Requirement 10 - where the production of a Traffic Management Plan, in accordance with the Outline Traffic Management is required, it is intentional that the Traffic Management Plan is not listed in Requirement 4.
REP5-061-05	With regards to other articles in the dDCO, Havering remains concerned that Article 13 (1) and Article 18 (2) still retains the words “any road“ which LB Havering believe is excessive and goes beyond the need of the DCO. Reference should be made to “roads within the red line boundary” to provide surety to the residents of Havering as to which roads may be affected.	Highways England maintains the position set out in the response to Action point 2 of Highways England’s Response to Actions from ISH 2 (REP4-026) and would reiterate that this is a well precedented provision and reference to ‘authorise the use as a parking space of any road’ is in every Highways England DCO.
REP5-061-06	It should be noted that Havering still object to the timelines set out for Deemed Consent and maintains the position it set out at Deadline 4 within REP4-031	With regard to the principle of ‘deemed consent’ please see paragraph 4.1.5 of the written submission of Highways England’s case put orally at ISH2 on the dDCO held on 5 March 2021 (REP4- 017).

REP5-062 – London Borough of Havering Comments on the Applicant's engagement

Response reference:	Representation Issue	HE Response
REP5-062-01	<p>London Borough of Havering (20025659) – Applicant engagement with residents of Putwell Bridge Caravan Park</p> <p>London Borough of Havering would like to bring to the attention of the Examining Authority (ExA) its increasing concern surrounding the level of engagement that the Applicant has had with residents of the Putwell Bridge Caravan Park. Furthermore, LB Havering would invite the ExA to consider this matter alongside the Equalities Act 2010 and whether the Applicant has met these standards, under which the residents are protected.</p>	<p>Please refer to PD-017-04 of Highways England's response to the ExA's Rule 17 – Request for further information (PD-017) (TR010029/EXAM/9.94).</p>
REP5-062-02	<p>In the Applicant's response (REP3A-020) to the LB Havering Local Impact Report, the Applicant has stated that the consultation report (AS-020) sets out the engagement that has taken place with residents of Putwell Bridge Caravan Park. Paragraph 8.33 of the consultation report states that <i>"on 3 October 2019 a meeting was held with the residents of the Caravan Park at Putwell Bridge to provide an update on the scheme, particularly the gas pipeline diversion and supplementary consultation"</i>.</p> <p>REP3A-020 further states <i>"Following further discussions with the occupants of Putwell Bridge Caravan Park, Highways England wrote to them on 2 July 2020 and 5 August 2020 confirming the removal of Plot 1/9 from the DCO application, which was the concern raised by the occupants with Highways England. There has been no further correspondence from the occupants of the Caravan Park"</i>.</p> <p>LB Havering is of the view that this is a completely unacceptable way to notify a <i>hard to reach</i> group about this scheme, particularly given the proximity to the site and potential impacts.</p> <p>The Council is very concerned that the Applicant appears to have made no effort since August 2020 to engage with the residents of Putwell Bridge, particularly given there has been a Targeted Consultation on changes to the scheme, since then.</p>	<p>Please refer to PD-017-04 of Highways England's response to the ExA's Rule 17 – Request for further information (PD-017) (TR010029/EXAM/9.94).</p>
REP5-062-04	<p>The Council is of the view that the Applicant needs to undertake a socially distanced site visit to physically meet with the residents of Putwell Bridge Caravan Park, and to make sure that they are fully aware of the proposals, and that they understand the implications for their site both during construction and operation. The Council would be happy to assist the Applicant in getting a site visit organised with the residents, if that would help.</p> <p>At the very least, LB Havering would expect the Applicant to be able to demonstrate that any written correspondence has been delivered and has been explained verbally in a way which is clear to the residents.</p>	<p>Highways England has arranged a meeting with the residents of the Caravan Park on Thursday 29 April and has invited the London Borough of Havering's liaison officer, Lee Craddock.</p>

Response reference:	Representation Issue	HE Response
REP5-062-05	<p>The Council remains concerned that should any changes to the scheme design be required when the Principal Contractor undertakes detailed design of the scheme post Development Consent, the residents may be required to temporarily relocate. As a final CEMP has not been produced, there is no surety from the Applicant that this will not be necessary.</p> <p>As Havering set out in its Deadline 3B submission (REP3B-006), Local Authorities are required to ensure sufficient locations are allocated to address accommodation need for Gypsy, Travellers and Travelling Showpeople. The Putwell Bridge site has been identified as a site to contribute to Havering's need.</p> <p>If the residents of Putwell Bridge need to temporarily relocate because of the scheme, the examining authority should be aware that there are no publically owned Gypsy and Traveller sites within the borough and there is no additional capacity on privately owned sites as these are being allocated in the emerging Local Plan to meet an identified need.</p>	<p>The Scheme is not expected to result in the need for the residents of Putwell Bridge Caravan Park to relocate. Under Requirement 4 of the DCO the final CEMP must be substantially in accordance with the outline CEMP and any amendments made to the final CEMP are not expected to result in any material changes to the Scheme that would require the residents of Putwell Bridge Caravan Park to be relocated either temporarily or permanently.</p>

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