



Havering
LONDON BOROUGH

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27th April 2021

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Dear Sir,

London Borough of Havering (20025659) Response to Applicant's Signposting Document REP5-052

LB Havering has reviewed the Signposting Document prepared by the Applicant in response to Written Question GQ 2.2 and TA 2.1. The ExA wished for clarification as to how this Signposting Document aided the understanding of the difference between a Code of Construction Practice (CoCP) and the current outline CEMP.

The current Signposting document does not provide an understanding as to why a CoCP is not required. The principles of a CoCP are not discussed, instead the Signposting document illustrates the interdependencies between the various outline documents including the proposed management plans. LB Havering sees this a major omission in terms of this Signposting document.

The Traffic Management Plan (TMP) is not seen to be linked to the outline CEMP which Havering believes to be important with particular regards to matters of pollution and community engagement. LB Havering would strongly advise that this link is made in the process and reflected in the document.

In the paragraphs dealing with transport interdependencies, no reference is given to the waste and materials movements. This omission highlights the Applicant's lack of appreciation of what a CoCP deals with as waste and materials handling and movements form a critical component of a CoCP.

It is noted that a Workforce Travel Plan (WTP) will be prepared for the final Traffic Management Plan which is welcome. LB Havering would wish to see the WTP provided for scrutiny under this Examination. The WTP is an important element of the CoCP.

One of the key benefits of a CoCP is that it brings together all the processes of ; general site management, neighbour engagement, transport (deliveries and collections, management of the areas around the work compounds for non-motorised users, parking management, contractor low emission vehicle use requirements), permitted hours of working (with permits), noise and vibration notices, dust and air quality.

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Community Engagement is a fundamental element of the CoCP. The scope of the community engagement, the methods and techniques to be employed, the duration of the works, the cumulative impacts of any construction sites operating in the vicinity needs to be included in the CoCP.

LB Havering recognises that the Outline REAC provides some information on some of these matters but wishes to reiterate that HE is currently preparing a CoCP for their Lower Thames Crossing Scheme, so a precedent has been set by Highways England on this matter.

In the absence of a CoCP that can be examined during this Hearing, Havering would wish that a pre commencement requirement is included in the Draft Development Consent Order (DdDCO) that will include for the production of a Site Construction Management Plan. The Site Construction Management Plan should provide a summary of the management, monitoring and auditing procedures to ensure compliance with the CoCP.

Thank you for the opportunity to comment on document REP5-052.

Yours faithfully,



Daniel Douglas,
Team Leader Transport Planning