



**Havering**  
LONDON BOROUGH

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Mr Richard Allen  
Lead Member of the Examining Authority

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

Dear Sir,

**London Borough of Havering (20025659) – LB Havering response to Outline Traffic Management Plan (REP7-017)**

Thank you for the opportunity to comment on the revised Outline Traffic Management Plan (OTMP) submitted by the Applicant at Deadline 7 (REP7-017). LB Havering wishes to make the following comments:

We welcome the production by Highways England of a revised Outline Traffic Management Plan (OTMP).

LB Havering previously commented in detail at deadline 5 on the specific issues identified from a review of the initial draft prepared by the Applicant, including in our responses the ExA's further written questions 2.4 to 2.6 (REP05-057).

Our concerns at that time can be summarised as follows:

1. Lack of clarity over the roles of the Highways England's contractor and delivery partner
2. A failure to recognise the specific status of LB Havering as a host local authority.
3. A failure to consider the unique transport circumstances of the residents of Woodstock Avenue in the OTMP and the lack of inclusion as a 'stakeholder group' in the same way that Maylands Golf Course, Grove Farm and Glebelands are.
4. Lack of commentary on closures of the A12 eastbound off-slip at M25 junction 28.
5. Issue of construction traffic using Petersfield Avenue and the control exercised over this issue.
6. The matter of parking for construction site operatives away from the designated work compounds.

It is noted that the performance of the TMP against Highways England's strategic objectives for such situations will now be formally measured on a red / amber / green basis (para 1.1.4). What is unclear is how an adverse finding will be dealt with and how Highways England would instigate corrective action or indeed if the OTMP or the TMO will offer commitment to this.

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We still note the 'delivery partner' will be responsible for the development of the final TMP. The role of the Applicant in this activity has not been clarified. No clarity reflecting the status of LB Havering as a host borough has been given.

We are now pleased to note that the need to discharge Requirement 10 of the DCO is now formally recognised as the approval mechanism of the eventual final TMP (para 1.1.5).

In para 1.1.6 we are of the view that the phrase 'substantially in accordance with' should be amended to reflect the ExA's preferred wording of the dDCO circulated at deadline 7. The word 'substantially' should be deleted. LB Havering will be welcoming the ExA proposals to delete the word "substantially" in a separate submission at Deadline 8.

We are now pleased that the May 2021 OTMP now recognises the issues facing Woodstock Avenue residents as a key theme for the TMP to address. We are also pleased to note that Table 2.3 now specifically sets out the adverse effect of A12 eastbound off-slip closures on Woodstock Avenue residents in the following terms *"Any temporary road closure at junction 28 which would prevent this manoeuvre will result in a lengthy diversion"*. We also note that para 2.3.14 includes reference to *"A12 eastbound off slip closures"*. What is still lacking however is a specific commitment to minimise the closures of the A12 off slip due to this significant adverse effect on local residents.

We note the more detailed commentary provided in respect of construction traffic routing and the policing of contractors accessing the site works compounds at paras 2.3.8 to 2.3.10. We welcome that temporary 'works traffic' signage is now committed to, and that construction related vehicles will be easily identifiable.

We would wish to have explicit reference to all construction traffic not using the Petersfield Avenue junction as a site access route. Signing solely for preventing HGV movements will create doubts in driver's minds; a complete prohibition would appear more pragmatic.

We are concerned that the previous wording which provide for sanctions against non-compliant contractors in terms of routing has been removed and replaced with vague assertions that issues can be raised with the principal contractor. Ultimately our view remains that Highways England are responsible for the management of their contractors and are accountable for their performance.

Para 2.3.48 reference is now made to *"adequate car parking will be provided within the site compound to accommodate those workers who are unable to use alternative means of transport"*. LB Havering therefore agree with the ExA's proposed DCO changes to remove allowing unfettered parking on roads within the order limits as no parking should take place outside of the work sites / construction compounds.

Thank you for the opportunity to comment on the updated Outline Traffic Management Plan.

Yours faithfully,



Daniel Douglas  
**Team Leader Transport Planning**