



**Havering**  
LONDON BOROUGH

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Mr Richard Allen  
Lead Member of the Examining Authority

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30th June 2021

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

Dear Sir,

**London Borough of Havering (20025659) – LB Havering response to the Applicant’s comments on LB Havering’s Deadline 7 submissions. (REP8-013)**

LB Havering welcomes the opportunity to respond to the following comments made by the Applicant to Havering’s deadline 7 responses.

With regards to REP7-033-02 concerning the provision of the NMU route from Brentwood to Harold Hill, Havering notes the Applicant’s statement that it will deliver not only the central section of the route through the junction but in due course the entire NMU scheme.

Havering has recently entered into discussions with the Applicant concerning the drafting of the S106 agreement that would secure the provision of the NMU route. At present HE’s initial draft S106 only deals with the provision of the central section of the NMU route. This leaves Havering with concern as to how the entire NMU route will be secured. Following discussions with Transport for London and Essex County Council, LB Havering has sent a revised version of the S106 agreement to the Applicant for their consideration. This includes some additional wording to the obligation that all authorities feel is an essential requirement to provide the surety that the respective local authorities need that the NMU route will be delivered in its entirety by March 2025.

Given that the Examination will close on 7 July 2021 and the fact the Applicant has already stated to Havering that there is little time to secure a S106 for the entire NMU route, Havering requests that the ExA gives consideration to the provision of a Requirement in the draft DCO to secure the entire NMU route.

Havering notes that Applicant’s response to REP7-033-12 that whilst the LB Havering embargo on roadworks in the lead up to Christmas is not specifically referred to in the Outline TMP it would be respected. LBH would prefer that specific reference to the LBH embargo is included in the Outline and Final TMPs

LB Havering remains disappointed with the Applicant’s response to the requirement for a CoCP. Havering would wish to see a requirement for the CoCP included in the draft DCO as per the dDCO issued by the ExA (PD-021).

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With regards to the Applicant's response to REP7-033-19, LB Havering notes the provision of an outline Community Engagement Strategy. Havering will provide comments on this document under separate cover. The Applicant in its response considers that Havering has made a "new ask" for the contributions for road safety education and active travel measures. This is not a "new ask", in fact LB Havering raised this issue in its Local Impact Report (REP1-031), REP1-033 and at Issue Specific Hearing 2.

LB Havering continues to recommend that as part of the community engagement supporting the construction of the scheme that active travel and road safety education measures are developed and implemented for sensitive receptors along local routes that experience an increase in traffic during construction. LB Havering documented this issue of disruption during construction on local routes in its response to the Transport Assessment Supplementary Information Report. (REP1-033). These local routes are seen to experience increases in traffic flows due to traffic diverting to avoid either construction traffic or traffic management measures (lane narrowings).

To support approach, upon commencement of construction, LB Havering seeks a contribution of £200k per annum over a three year period. This contribution will support the delivery of interventions and the work that is done on sustainable and active travel and road safety education. In addition to this contribution, LB Havering recommends that a financial contribution to support the continued delivery of free cycle training for the boroughs school children and wider residents in the vicinity of the construction routes. Upon the commencement of construction, LB Havering seeks £100k per annum over a three year period.

Para 4.71 of the NPS states that *The Secretary of State should expect the safety assessment to have considered the safety implications during the construction, commissioning and operational phases of the development.* The Applicant has not carried out a safety assessment to consider safety implications during construction as it considers that the construction traffic impacts to be low but the Applicant has failed to take into account the redistribution of traffic onto school routes will have an impact on sensitive receptors during construction. LB Havering believes that the mitigation measures suggested above will ensure that the proposed scheme is policy compliant.

LB Havering notes that the Applicant is in the process of updating the Outline LEMP for Deadline 9 and looks forward to seeing the changes it proposed in REP7- 033-36 incorporated into the updated Outline LEMP.

With regards to the submission of a temporary car park for the Gardens of Peace Muslim Cemetery, LB Havering can confirm that HE has been in contact with the planning authority regarding this matter. LB Havering wishes to reiterate its previous comments regarding the timescales and the consenting process. It will not be able to provide the ExA with a decision on the application prior to the Examination closing on 7 July 2021.

LB Havering notes that on several occasions, through the Applicant's responses, that HE state that if the final documents do not include the wording that LB Havering has suggested during the Examination (for example, the Outline CEMP etc) then LB Havering will have the opportunity to raise the same issues with the Secretary of State (SoS) when Havering is consulted on the final documents. LB Havering notes this position but would prefer that the suggested wording is included in the documents submitted to the ExA during the Examination.

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This would provide Havering with the confidence that the matters it has raised have been addressed rather than having to reiterate its reasoning for a second time with the SoS.

Yours faithfully,



Daniel Douglas  
**Team Leader Transport Planning**