



Havering
LONDON BOROUGH

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London Borough of Havering (20035775) – Procedural Deadline B Response

Dear Sir,

Thank you for the opportunity to make a written submission on matters related to Procedural Deadline B (PDB).

Written submission of oral comments made at the Programming Meeting

LB Havering confirmed that it had registered as an Interested Party for the Lower Thames Crossing Examination. The lead contact at LB Havering throughout the Examination period will be Daniel Douglas, who throughout the Examination period will be supported by a wider technical team reflecting the Examining Authority's (ExA) Initial Assessment of the Principal Issues as set out in Annex B of the Rule 6 letter (PD-013).

LB Havering confirmed that a formal approval process had been agreed internally to fast track submissions during the Examination in line with the the role Local Authorities play in the DCO Examination process.

LB Havering confirmed that it would be in a position to meet deadlines as set out in the Draft Examination Timetable in Annex D of the Rule 6 letter (PD-013).

LB Havering confirmed that work on preparing the Local Impact Report (LIR) was underway with the intention of submitting the LIR at Deadline 1 of the Draft Examination Timetable.

LB Havering raised the point that there are two Issue Specific Hearings currently earmarked for 21st June Project Definition (ISH1) and 22nd June Draft DCO (ISH2) and an Open Floor Hearing (OFH1) scheduled for 20th June. LB Havering expressed concern that it will be challenging to reflect the outcome of those two Issue Specific Hearings within the Local Impact Report even taking into account an expedited internal approval process that Havering has in place. LB Havering invited the ExA to consider this point.

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Written submission of matters raised at the Programming Meeting

LB Havering notes the comments made by Thurrock Council concerning the Draft Examination Timetable and the challenges they face submitting material including the Local Impact Report, Written Representation and Written Question Deadlines during Examination. LB Havering also notes the request made by Thurrock Council for the start of the Examination to be delayed.

LB Havering also notes the comments made by Gravesham Borough Council around the challenges they would face should there be a delay to the start of the Examination with matters such as a Local Plan to consider.

LB Havering would like the Examination to commence in line with the timetable that has been set out in the Rule 6 letter. Other key planning processes some Local Authorities are currently going through in part depend on a satisfactory conclusion to the Lower Thames Crossing Development Consent Order process and any further delay to the Examination process, whilst being helpful for one or more Interested Parties, will be unhelpful for others.

It is recognised however that due to the complex nature of any Development Consent Order Examination, it will not be possible to have a timetable that will be to the satisfaction of all Interested Parties.

Changes to the Draft Examination Timetable

The position Havering made at the Programming Meeting concerning the first two Issue Specific Hearings and the deadline for submission of the Local Impact Report (summarised in the final paragraph on page 1 of this submission), remains the Council's view. LB Havering would invite the ExA to consider either moving the submission of the Local Impact Report from Deadline 1 to Deadline 2, or alternatively to reschedule the dates for the first two Issue Specific Hearings to avoid these difficulties.

Requests for Clarification

LB Havering notes that the first Issue Specific Hearing (ISH1) schedule for Wednesday 21st June covers the topic of Project Definition. LB Havering further notes in Annex B of the Rule 6 letter (PD-013) the matters underneath Project Definition that the ExA want to cover during the Examination. LB Havering requests clarification from the ExA as to what input is expected from Interested Parties on this matter.

It is noted that Issue Specific Hearing 2 (ISH2) intends to examine the draft Development Consent Order (AS-038). A review of the Draft Examination Timetable set out in Annex D of PD-013 suggests that there is currently no opportunity for Interested Parties to submit comments on the Draft Development Consent Order (AS-038) ahead of ISH2. LB Havering would invite the ExA to consider requesting comments on the draft DCO from Interested Parties by Procedural Deadline C 13th June.

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Written submissions on the Examination procedure and draft timetable

- Initial Assessment of Principal Issues

LB Havering notes the Initial Assessment of Principal Issues by the ExA as set out in Annex B of the Rule 6 letter. LB Havering welcomes the Principal Issues set out in Annex B and looks forward to discussing these further during the Examination.

LB Havering would invite the ExA to consider the following additions to the Initial Assessment of Principal Issues to be examined:

- The matter of Policy Compliance of the Application. This is a matter that host Local Authorities are likely to address in their individual Local Impacts Reports, therefore it is suggested that it would be appropriate to highlight this matter as a Principal Issue to be examined.
- It is recognised that the ExA intends to examine construction effects in relation to Issues (as set out on page B1 of PD-013) and this is welcome. LB Havering would invite the ExA to consider the inclusion of construction effects as a matter to be examined as a specific issue under Item 4 Traffic and Transportation. LB Havering considers the construction effects of the scheme on the local road network to be equally as important as once the scheme is fully operational.
- It is noted that mitigation proposals and their effects will be considered in relation to the Principal Issues that have been identified which is welcome. LB Havering would invite the ExA specifically to identify mitigation for the Wider Network Impacts as a matter to be examined specifically under Item 4 Traffic and Transportation.

Arrangement for future Examination Hearings

LB Havering notes the dates for further potential Hearings that are contained within Annex D of PD-013. Given the geographical size of the Application being examined, Havering would welcome the use of virtual methods being used as part of the Examination Hearings process. It is suggested that enabling Hearings to operate as blended events whereby Interested Parties have the opportunity to attend in person or virtually would be helpful for such Parties who would have a significant travel time in order to reach any event venue.

Requests to be heard orally at Preliminary Meeting Part 1

LB Havering would like to request to be heard orally at the Preliminary Meeting.

Yours faithfully,



Daniel Douglas

Team Leader Transport Planning

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