



Havering
LONDON BOROUGH

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London Borough of Havering (20035775) - Comments on the Applicant's Deadline 6 Submissions

Dear Sir,

In response to the Applicant's submissions to Deadline 6 please find below London Borough of Havering's comments.

6.3 Environmental Statement Appendices Appendix 2.2 – Code of Construction Practise (CoCP), First Iteration of Environmental Annex A Outline Site Waste Management Plan (oSWMP) v2.0 (Tracked changes) {REP6-041}:

- Table 4.3 REAC for Waste Management – preparing for reuse

The Council welcomes that the REAC Ref MW007 has been strengthened to reflect that any disposal would be reported in the SWMP and would demonstrate “no practical route availability”

The Council supports the changes made to each reference MW012. This helps clarify how sites selected for offsite facilities will be identified and the criteria that will be used.

- Updating the CSWMP.

The Council supports the change put forward by the Applicant in reference to evidencing application of the waste hierarchy [through identifying tonnage recycled or reused on site].

9.8 Environmental Statement Addendum v6.0 (Tracked changes) {REP6-055}

- 6.1 Environmental Statement - Chapter 12 – Noise and Vibration

The Council agrees with the wording change set out in *Table 2.6 Environmental Statement chapter updates – Deadline 5 for paragraph 12.5.15* of ES Chapter 12.

The Council agrees with the wording change for paragraph 12.6.2002 of ES Chapter 12, although no LB Havering homes will be eligible.

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With regards to the proposed word changes in paragraph 12.8.7, the Council understands the difficulty and uncertainty with post opening monitoring as a verification check of the scheme.

- Table 2.7 Environmental Statement chapter updates – Deadline 6.

The Council agrees with the wording proposed for paragraphs 12.5.13 bullet point l,l and bullet point m.i.

6.3 Environmental Statement Appendices Appendix 6.9 – Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation v3.0 (Tracked Changes) {REP6-045}

The Council welcomes the updated wording in section 7.2 Communication, monitoring and sign off reflecting improved liaison between the Applicant and the local government archaeology advisers during the work eg. section 7.2.

The Council has written to the Applicant concerning a number of matters relating to the Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS OWSI) document which still need reflecting. Whilst it is recognised that these comments could not have been reflected in the Applicant's Deadline 6 submissions, it is very much hoped that they can be reflected in a future iteration that is submitted to the ExA.

The Applicant has helpfully outlined that the Palaeolithic investigations will be subject to a future, separate addendum written by specialists. The Council recommends that the tables in section 3.3, paras. 6.4.37 and 6.4.38 and para. 7.3.118 of the AMS-OWSI are updated following agreement of that document, to conform with the addendum.

In addition, articulating that specialist mitigation palaeolithic fieldwork may well still be appropriate, even if only deposits of potential rather than in situ flint scatters are found in the test pits, is a key point the Council would like to see spelled out in place of the current, very high bar for a mitigation stage (6.4.38).

The Council also recommends that the Anticipated Archaeological Potential for the scheme in 4.2 highlights the specific Palaeolithic cultural potential and the Pleistocene macrofaunal potential of the Ockenden/Belhus channel, in addition to broader palaeoenvironmental and geoarchaeological aspects from early prehistory.

There are a number of other specific matters concerning individual paragraphs of the OWSI and also concerning the Archiving Strategy, that the Council wrote to the Applicant about on 26th October 2023. Having very much hopes these points are also considered in the next iteration of the AMS-OWSI.

With regards to section 8.3 Post Excavation Assessment Report (PEAR), the Council continues to recommend that audience mapping can and should seek to identify groups and communities outside the traditional audiences for archaeological work and show how those will be identified, approached and kept interested.

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Outline Traffic Management Plan for Construction v6 (OTMPfC) (Tracked changes)
{REP6-049}

LB Havering welcomes that the OTMPfC v6 sets out plans to move forward the construction of the M25 temporary slip roads into periods 3 and 4 of the construction programme. This is an essential mitigation for construction traffic using local roads in the borough and the planned reduction in time taken for construction is also supported.

However, Havering notes that the OTMPfC v6 still assumes a 2030 opening year (table A.1) and also that the Ockendon Road closure is still quoted as being longer than the now committed cap of 10 months duration (see table A.4, ref RNTM58).

LB Havering welcomes the additional clarity provided by the OTMPfC v6 in terms of the approach to be taken by the Traffic Management Forum (TMF) to engagement with the Travel Plan Liaison Group (TPLG) and the Worker Accommodation Working Group (WAWG). It does not however appear to require formal engagement between the Traffic Manager (TM) and the Travel Plan Coordinator (TPC) to resolve issues before escalation to the Joint Operations Forum (JOF).

LB Havering is supportive of the stated requirement (at para 3.3.14) for the TM to be a person of suitable experience. LB Havering welcomes that the TM will be in place throughout the construction phase from mobilisation to commissioning as set out in table 2.2.

Interaction between OTMPfC and PP

LB Havering notes that the Protective Provisions (PPs) submitted for the ExA's consideration (REP-5-108) included details on the conduct of maintenance operations and winter maintenance operations. The oTMPfC at para 3.2 et seq still considers that these arrangements would be subject to a final Traffic Management Plan and local operating agreements. Further, should no agreement be reached by the Applicant with LHAs then the SoS would dictate the conduct of maintenance operations and winter maintenance operations on local authority roads affected by the Order (para 3.2.3).

Should the ExA recommend the PPs as drafted to the SoS, the oTMPfC in turn will need to recognise the content of those PPs. LB Havering suggests that the oTMPfC is worded to include in para 3.2 the phrase "in accordance with the Protective Provisions in favour of local highway authorities."

Yours faithfully,

Daniel Douglas

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