

SCOPING OPINION:

Proposed M25 Junction 28 Improvements

Case Reference: TR010029

Adopted by the Planning Inspectorate (on behalf of the Secretary of State for Communities and Local Government) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

December 2017

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1. INTRODUCTION

1.1 Background

- 1.1.1 On 14 November 2017, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Highways England (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed M25 Junction 28 improvements (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'*.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled *'M25 Junction 28 Improvement – Environmental Impact Scoping'* (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 At the same time as making the request under Regulation 10, the Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.
- 1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
- (a) *any information provided about the proposed development;*
 - (b) *the specific characteristics of the development;*
 - (c) *the likely significant effects of the development on the environment;*
and
 - (d) *in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.
- 1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

- 1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).
- 1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.
- 1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
- (a) *a plan sufficient to identify the land;*
 - (b) *a description of the proposed development, including its location and technical capacity;*
 - (c) *an explanation of the likely significant effects of the development on the environment; and*
 - (d) *such other information or representations as the person making the request may wish to provide or make.*
- 1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.
- 1.1.12 In accordance with Regulation 14(3)(a) where a scoping opinion has been issued in accordance with Regulation 10, an ES accompanying an application for an order granting development consent should be based on "*the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)*".

1.2 The Planning Inspectorate's Consultation

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should

note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in undertaking the EIA.
- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in carrying out the EIA.

1.3 Article 50 of the Treaty on European Union

- 1.3.1 On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 29 March 2017 the Prime Minister triggered Article 50 of the Treaty on European Union, which commenced a two year period of negotiations regarding the UK's exit from the EU. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/resources.

2.2 Description of the Proposed Development

2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in Chapter 1 and in more detail in Chapter 2 of the Scoping Report.

2.2.2 The Proposed Development comprises the upgrading of Junction 28 of the M25, which connects the motorway to the A12 in Essex. The proposals involve converting the use of the existing hard shoulder over the M25 viaduct to a proposed deceleration lane and an associated road diverge to be configured as shown in Appendix A of the Scoping Report. This proposed diverge is shown in Appendix A as a loop within the north-west quadrant of the existing junction. The Proposed Development would realign the existing M25 northbound/circulatory lane merge as described in paragraph 2.5.2 of the Scoping Report so that this will pass under the proposed diverge loop. No changes to the existing railway and M25 viaduct structure are proposed. The Proposed Development is shown in Figures A-1 to A-3 in Appendix A.

2.2.3 The proposed DCO boundary includes the existing M25 Junction 28, a section of the M25 corridor, a section of the A12 corridor, and adjacent land to the north west of the junction. It is located between the settlements of Brentwood and Romford, on the border of the London Borough of Havering (LBH) and Brentwood Borough Council (BBC) administrations. A location plan is provided at Figure A-2 (Appendix A) of the Scoping Report.

2.2.4 The proposed DCO boundary is situated within a largely rural area in Green Belt land, surrounded by agricultural fields, areas of woodland (including parcels of Ancient Woodland), and a former landfill site which lies to the north west of Junction 28. The Ingrebourne River and the Weald Brook watercourses cross the site. The National Cycle Network Route (NCNR) 136 crosses the A12 approximately 1km west of Junction 28. Existing footpaths also access the A12 and A1023 in the vicinity, and there are shared use paths (SUPs) which give public access to both roads and to a grade separated crossing over the A12 (paragraphs 2.5.3 to 2.5.5 of the Scoping Report).

- 2.2.5 BBC have declared two Air Quality Management Areas (AQMA) in the vicinity, and the LBH has declared an AQMA to the west. Two Local Nature Reserves (LNR) are located to the north west of the Junction. A Grade II listed building is situated to the east of the junction on Brook Street and two Registered Park and Gardens, Warley Place and Weald Park, are located to the south and the north respectively. Existing infrastructure within the proposed DCO boundary includes the Great Eastern Mainline railway, operating between Stratford and Shenfield, which crosses the motorway immediately south of Junction 28, a high pressure gas main to the east of the Junction, an overhead power line to the west, and the M25 viaduct as shown in Figure A-3, Appendix A of the Scoping Report.

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

- 2.3.1 Section 2.5 of the Scoping Report provides a brief description of the main components of the Proposed Development. The Inspectorate expects that at the point of application the ES should include a detailed description of the Proposed Development which includes all of the works for which development consent is sought.
- 2.3.2 The length of the scheme (in km) and the size of the proposed DCO application site (in hectares) are not given in the Scoping Report and this information must be specified in the ES. Details of other components such as signage, gantries, lighting, drainage features, and environmental mitigation features have not been specified in the Scoping Report and this information should also be provided in the ES.
- 2.3.3 The text in Table 1.1 directs the reader to Appendix A of the Scoping Report for information regarding land use during construction; however the figures in the appendix do not illustrate temporary and permanent land-take. The ES should clearly identify the land that would be required temporarily during construction (eg the location of construction compounds, material stockpiles, borrow pits, and haul roads), as well as the land that would be required for the operational phase. The proposed DCO boundary applied for must allow for the land-take associated with all works and project elements proposed as part of the application, including requisite demolition works, drainage features, and mitigation areas.
- 2.3.4 The Inspectorate notes that the Preliminary DCO Boundary shown on Figure A-2 of the Scoping Report extends approximately 2km south of Junction 28 along the M25. It is not clear from the description in the Scoping Report if permanent works or temporary activities (eg traffic management measures associated with the construction phase) are proposed within this area. Similarly, the Preliminary DCO Boundary extends around an existing overhead electricity transmission line (identified on Figure A-2 of the Scoping Report) but any works in this location are not explained in the Scoping Report.

- 2.3.5 Where flexibility is sought, the ES should set out the parameters that would apply for all components of the Proposed Development, where applicable setting out clearly any proposed limits of deviation. This should include the footprint and heights of structures and permanent earthworks such as embankments (taking account of existing ground levels), as well as land-use requirements for all phases and elements of the development. The description should be supported by appropriate figures/drawings which should be clearly and appropriately referenced in the ES. Further advice on flexibility is provided below.
- 2.3.6 The ES should describe any anticipated phased approach to construction, including the likely duration and location of construction activities. The Inspectorate notes the information in paragraph 2.5.7 of the Scoping Report regarding the anticipated year of construction and operation and would expect this to be incorporated consistently into the ES, in particular where construction year, opening year, and design year assessment scenarios are presented. Construction traffic routing and anticipated numbers/types of vehicle movements (for example to move excavated material noting the volume estimated in paragraph 2.5.6 of the Scoping Report) should be described, with sufficient detail to enable a robust assessment in the ES.
- 2.3.7 The ES should include a description of the nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) to be used during construction. The ES should describe and assess the impacts associated with any particular technologies or substances proposed to be used for the construction phase.
- 2.3.8 The Scoping Report provides a brief description of the location of the Proposed Development, and an overview of footways and other non-motorised routes in the vicinity. The Inspectorate would expect a section in the ES which summarises the site and surroundings, to provide the context of the Proposed Development. The ES should provide a detailed description of the existing land uses and features across the land to which the proposed DCO application relates and surrounding area, and this information should be applied to the relevant aspect assessments where relevant.
- 2.3.9 The Scoping Report and the accompanying environmental constraints plan (Figure A-1, Appendix A of the Scoping Report) identify a number of landscape, historic, ecological, and other features in the vicinity of the Proposed Development. These features are not individually identified or referenced and it would provide greater clarity and assist future consultation to do so. The figures presented in the ES should be prepared accordingly.

Alternatives

- 2.3.10 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are

relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects’.

- 2.3.11 The Inspectorate would expect to see a discrete section in the ES that provides details of the alternatives considered and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.
- 2.3.12 Chapter 3 of the Scoping Report (‘Alternatives’) sets out the approach taken in developing options for the Proposed Development. This chapter provides an overview of the options and the reasoning behind the chosen option. Paragraph 3.2.6 refers to an environmental assessment of the options undertaken to inform the decision, however no details of this assessment are provided. The ES should include this information not least so that it can be understood how environmental effects, and the responses of stakeholders, have been taken into account in the choices made.

Flexibility

- 2.3.13 The Applicant’s attention is drawn to the Inspectorate’s Advice Note 9 ‘Using the ‘Rochdale Envelope’¹, which provides additional details on the recommended approach. The Inspectorate notes the intention in paragraph 4.7.2 of the Scoping Report to apply this advice.
- 2.3.14 The Proposed Development parameters will need to be consistently and clearly defined in both the draft DCO (dDCO) and in the accompanying ES. At the time of application, any Proposed Development parameters should not be so wide-ranging as to effectively represent different developments. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.
- 2.3.15 It should be noted that if the Proposed Development changes substantially during the EIA process and prior to submission of the application the Applicant may wish to consider requesting a new scoping opinion.

¹ Advice Note nine: Using the Rochdale Envelope. 2012. Available at:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3. EIA APPROACH

3.1 Introduction

- 3.1.1 This section contains the Inspectorate's specific comments on the scope, and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note 7 'Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping'² and associated appendices.
- 3.1.2 Aspects/matters are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report. The Inspectorate has set out in this Opinion where it has/has not agreed to scope out certain aspects or matters on the basis of the information available at this time. The Inspectorate notes that it is the Applicant's intention to include all of the aspects/matters detailed in IAN 125/15 in the ES, along with a number of relevant aspects/matters set out in the EIA Regulations. This approach is explained in Chapter 4 of the Scoping Report. The Inspectorate is content that this should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.3 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendations to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental

² Advice Note seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping. Available from:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

requirements for NSIPs, which Applicant's should address within their ES, as relevant.

- 3.2.2 The designated NPS relevant to the highways sector is the National Policy Statement for National Networks (NPSNN). The Inspectorate notes that this is identified in Table 1.2 of the Scoping Report as a key consideration, and advises that the EIA takes account of this policy document.

3.3 Scope of Assessment

General

- 3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:
- to demonstrate how the assessment has taken account of this Opinion;
 - to identify and collate the residual effects after mitigation for each of the specialist aspect chapters, including the relevant interrelationships and cumulative effects;
 - to set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement); and
 - to describe any remedial measures that are identified as being necessary following monitoring.
- 3.3.2 The Inspectorate considers that where a DCO application includes works described as 'associated development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between effects that primarily derive from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as associated development, for example through a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.
- 3.3.3 The Inspectorate notes that it is proposed in Chapter 4 to assess impact to human health in the Air Quality, Noise, Road Drainage and Water Environment, and People and Communities aspect areas. The Inspectorate has had regard to the information provided in the Scoping Report and has taken into account the nature and characteristics of the Proposed Development and is generally content with this approach. The Inspectorate agrees with points raised by the Health and Safety Executive that impacts to human likely to result from proposals relating to existing infrastructure must be assessed in the ES. The assessment should have particular regard to the existing railway, overhead electricity

line, the historic landfill site north west of the Junction, and the gas pipelines shown on Figures A-1 and A-3 of the Scoping Report.

- 3.3.4 The Inspectorate also recognises that the existing infrastructure presents a challenging constraint to the design of the Proposed Development and potentially to the powers required in the dDCO and therefore on the information on which the EIA will be based. The Inspectorate advises that interactions between the Proposed Development and existing infrastructure assessed are fully explained and assessed in the ES. The LBH have raised points in this regard in their response in Appendix 2 of this Scoping Opinion.
- 3.3.5 While the structure of the ES remains for the Applicant to decide, the information that would be expected to appear in a Transport chapter must be provided in the ES. The Inspectorate notes that a Transport chapter is not included in the draft structure of the ES presented in the Scoping Report. LBH and Essex County Council (ECC) have noted the absence of information regarding anticipated traffic levels. The Inspectorate considers that the ES must clearly explain where the information gathered as part of the traffic assessment (including traffic modelling and baseline transport information) is applied to other aspect assessments within the ES, for example Air Quality, Noise and Vibration, and People and Communities.
- 3.3.6 The ES should assess the impacts from proposed construction traffic management measures including any road closures or diversions. Royal Mail Group Ltd have provided comments in this regard along with information on their operations in the area which could have a bearing on this assessment.
- 3.3.7 The approach to the EIA is outlined in Chapter 4 of the Scoping Report, and paragraph 4.6.1 states that decommissioning effects are not considered relevant to the Proposed Development. Paragraph 2.5.9 of the Scoping Report states that the Proposed Development will have an indefinite design life and also states that decommissioning will not be included in the ES. The Inspectorate considers that this is a reasonable approach taking into account the specific characteristics of the Proposed Development as a whole. However, the Inspectorate considers that any decommissioning associated with dismantling and replacing particular elements of the Proposed Development once they reach the end of their design life should be assessed where significant effects are likely to occur.
- 3.3.8 Notwithstanding the comments above regarding decommissioning, the Applicant should ensure that any potential significant effects from any demolition or removal of existing structures to enable the Proposed Development are assessed within the ES.
- 3.3.9 It is noted from the Scoping Report that an assessment under the Habitats and Species Regulations 2017 is unlikely to be required. The Inspectorate considers that an up to date HRA screening report should be

produced (the Inspectorate notes the assessment referred to in Chapter 4) and should be referenced in the ES. The HRA report should in turn contain references to where the information on which it is based can be found in the ES.

- 3.3.10 Throughout the Scoping Report, reference is made to 'the Scheme,' 'the project', 'the construction site', 'the red line boundary', and 'the Site'. Some of these terms appear to be used interchangeably. This is of particular relevance to understanding the study areas applied and how the relevant baseline information has been captured, and therefore understanding the basis of the assessments of the likely significant effects of the Proposed Development. The ES should apply terminology used carefully in order to preserve the distinction between terms and aid clarity.

Baseline Scenario

- 3.3.11 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.
- 3.3.12 The Inspectorate notes the information within section 4.6 of the Scoping Report which sets out the temporal scope of the assessments. Key terminology including 'do-minimum scenario' and 'do-something scenario' is introduced, however only the 'do-minimum' is defined. Reference is made to the use of baseline year and future baseline years of assessment but exact scenarios are not committed to in the Scoping Report. The final approach adopted should be defined in the ES and based on the most up to date anticipated project timescales. The approach must be adopted consistently across each aspect chapter of the ES. Where any individual aspect assessments depart from that approach it should be explained in the ES.

Forecasting methods or evidence

- 3.3.13 The ES should contain the timescales upon which the surveys which underpin the aspect assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.
- 3.3.14 The methodology set out in section 4.5 of the Scoping Report is noted. The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the EIA, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA. Any departure from that methodology should be described in individual aspect assessment chapters.

- 3.3.15 The Inspectorate recommends that the Applicant fully describes and justifies in the ES the methodologies they have used for the assessments, in particular where these depart from standard guidance or where no standard guidance exists. The Inspectorate considers that the ES should present the specific assessment methodology relevant to each individual aspect/matter assessed. If an overarching methodology is applied this should be explained with relevant cross reference, and any departures from the prescribed methodology should be explained and justified. It would also be of benefit to provide figures in the ES that show the extent of the study areas used for the assessments and identify the receptors. The Inspectorate considers that relevant survey data which inform the assessments should be appended to the ES.
- 3.3.16 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and emissions

- 3.3.17 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.
- 3.3.18 The Inspectorate notes the proposal at paragraph 4.12 of the Scoping Report to scope out heat and radiation according to the Applicant's conclusion that they are not relevant due to the characteristics of the proposed scheme. The Inspectorate has taken into account the nature and characteristics of the Proposed Development and agrees that significant effects resulting from heat and radiation are unlikely to arise and therefore agrees that this aspect may be scoped out.

Mitigation

- 3.3.19 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The predicted significance of effects both prior to and following the implementation of proposed mitigation measures should be identified. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured ideally with reference to specific DCO requirements or other legally binding agreements.

Vulnerability of the development to risks of major accidents and/or disasters

- 3.3.20 The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters,

including the vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

- 3.3.21 The Inspectorate notes that it is proposed in Chapter 4 Section 4.13 of the Scoping Report not to provide a separate chapter in the ES on major accidents and disasters but that major events will be reported in relevant aspect chapters. It is noted that there is a commitment to assess the vulnerability of the Proposed Development to major accidents and disasters, and how such events could change the predicted environmental effects. The Scoping Report does not address the potential for the Proposed Development to lead to or exacerbate major accidents or disasters. If the Proposed Development could lead to or exacerbate a major accident or disaster this must be assessed in the ES. The Inspectorate notes the proximity of the Proposed Development to existing railway, overhead electricity line, and a high pressure gas main infrastructure which may be a relevant consideration. The ES should assess these impacts within relevant aspect chapters.

Transboundary effects

- 3.3.22 Schedule 4 part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Inspectorate notes that the Applicant has indicated in the Scoping Report that the Proposed Development is unlikely to have significant impacts on another European Economic Area (EEA) State.
- 3.3.23 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected.
- 3.3.24 The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected.

A reference list

- 3.3.25 A reference list detailing the sources used for the descriptions and assessments must be included in the ES. The Inspectorate notes the

inclusion of a reference list in Chapter 18 of the Scoping Report organised by chapter and welcomes this approach.

3.4 Confidential Information

- 3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2014.

4. ASPECT BASED SCOPING TABLES

4.1 Air Quality

(Scoping Report Chapter 5)

The construction phase study area for the assessment of construction dust is set at 200m from the 'construction site boundary', with reference to the Design Manual for Roads and Bridges (DMRB) (HA 207/07). The construction traffic and operational phase study area is described as the 'Affected Road Network' (ARN) which has been determined at the option selection stage and will be further refined on the basis of traffic modelling to be undertaken. Three AQMA exist within the study area (for NO_x and PM₁₀).

The proposed methodology is set out in the Scoping Report, and has taken into account DMRB Volume 11; HE interim Advice Notes (IANs); and Defra's Local Air Quality Management (LAQM) Technical Guidance (2016). The relevant Air Quality Standard air quality criteria and EU limit values are identified as those for NO₂ and PM₁₀. Information on baseline conditions has been gathered through existing monitoring studies and diffusion tube survey implemented for the Proposed Development. Sensitive receptors are identified in Table 5.4. The Scoping Report proposes a detailed level of assessment with respect to dispersion modelling of operational effects.

The Applicant predicts increased dust emissions during construction, and changes to traffic flows during both construction and operation resulting in air quality effects. Assessment scenarios representing the base year, construction start, year of opening, and design year, are presented.

The Inspectorate has provided comments on matters that the Applicant has set out as being scoped out of the EIA.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	5.4.4	Pollutants	The Scoping Report states that national assessments have demonstrated that there is no risk of exceedance of the air quality objectives set for 1,3-butadiene, benzene, carbon monoxide, lead or sulphur dioxide due to traffic emissions anywhere in the UK, and therefore no further assessment is intended. The Inspectorate agrees with the reasoning in the Scoping Report that significant effects associated with these pollutants are unlikely and is content for further assessment to be scoped out of the ES.
2		Pollutants	The Scoping Report does not state if/how impacts resulting from increased PM _{2.5}

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			emissions will be taken into account. The Inspectorate considers that the ES should include an assessment of impacts associated with increased PM _{2.5} resulting from the Proposed Development. In determining significance, the assessment should take into account performance against relevant target/limit values.
3	5.4.5	Ecological receptors	It is noted that only internationally and nationally designated sites are identified as sensitive receptors. The Applicant should additionally assess locally and non-designated sites that could be significantly affected by the Proposed Development. The Inspectorate recommends that the relevant ecological receptors to be included in the assessment should be agreed with NE and the local planning authorities.
ID	Para	Other points	Inspectorate's comments
4	5.2.1 and 5.2.2	Study area	<p>'Construction site area' – the meaning of this term is unclear. The study area applied to the construction dust assessment must be clearly described in the ES. The study area should be appropriate with regards to the extent of the DCO.</p> <p>With respect to the assessment of construction traffic and operational traffic emissions, the ARN for the local and regional assessments must be clearly defined in the ES. ECC has provided advice regarding the roads to be included in the transport assessment which should be given regard with respect to the assessment of air quality effects.</p>
5	Figure B-1	Monitoring locations	<p>The Scoping Report refers to a number of monitoring locations which are not depicted on the accompanying figure as stated. The ES must include a description of each monitoring location and depict them on a clearly legible figure(s).</p> <p>The LBH has provided information in their consultation response on monitoring locations along the A12 which could be used to inform the assessment. The Applicant should make effort to agree monitoring locations with consultees.</p>
6	5.7.5	Significance of	It is unclear how the significance of effects

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		construction dust effects	will be determined. In the absence of appropriate guidance, such as exists for local air quality effects in the form of IAN 174/13, this should be assessed using an evidence-based methodology, and described in the ES. The Applicant should seek agreement with the Local Planning Authorities on the methodology for determining significance of effects.
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4.2 Noise and Vibration

(Scoping Report Chapter 6)

The proposed construction study is broadly defined as no more than 300m from the road and at representative nearest noise sensitive receptors but remains to be confirmed. The operational study area is proposed to be defined in accordance with DMRB HD213/11 and with respect to the affected road network defined by traffic modelling.

The proposed construction assessment methodology is based on industry standard guidance (BS5228:2009+A1:2014) and the operational methodology is based on DMRB HD213/11 supported by noise modelling and basic noise level calculations based on the Calculation of Road Traffic Noise (CRTN) methodology.

Adverse noise and vibration effects are predicted during construction, due to construction and demolition activities and changes in traffic flows. Adverse effects are also anticipated during operation due to changes in traffics flows, speeds and road alignments. No opinion is provided regarding the likely significance of these effects.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	6 6.2 6.7 Table 17.1	Noise and vibration	The proposed approach to the assessment of noise and vibration in the Scoping Report does not specifically address how and when vibration impacts will be assessed. The ES should include an assessment of vibration impacts where such impacts may result in significant effects. The assessment should address impacts that derive from construction and operational activities.
ID	Para	Other points	Inspectorate's comments
2	6.3.11 6.3.12	The Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL)	LOAEL and SOAEL should be defined for all of the construction and operational noise and vibration parameters assessed. Mitigation measures should be set out accordingly.
3	6.4.10	Noise survey	Noise surveys should be undertaken to a recognised standard e.g. BS7445-1:2003 and monitoring locations should be agreed with the relevant local planning authority. Survey results should be reported as part of the assessment in the ES.
4	6.6.4	Detailed noise modelling	The Applicant should set out the noise modelling software and all modelling

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			assumptions within their ES.
5	6.7	BS5228:2009+A1:2014	The Applicant states that the BS5228 methodology will be applied but does not state which of the Annex E assessment methods will be adopted. This should be agreed with relevant consultees and the information should be provided in the ES.
6	6.10.2 6.10.5	Mitigation	The Scoping Report indicates that new roadside noise barriers or extension of existing noise barriers may be required as mitigation against increased noise levels during construction and operational phases. The ES should explain the location(s) where noise barriers will be installed as well as the dimensions of any proposed barriers or extensions to existing barriers where these are considered necessary.

4.3 Biodiversity

(Scoping Report Chapter 7)

Section 7.2 describes the study area applied to assess the potential significant effects on ecological receptors. The Scoping Report states that the study area includes an Ecological Zone of Influence (EZOI) which is varied in spatial extent depending on the ecological receptor, up to 30km from the 'red line boundary' for Special Areas of Conservation (SAC) where bats are a qualifying feature.

Baseline conditions were identified using a combination of desk study and field survey, including an Extended Phase 1 Habitat Survey of publicly accessible land following JNCC (2010) methodology and guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM) (2013). The need for further surveys and assessment is identified in paragraphs 7.5.5-7.5.11 and section 7.7. The Applicant makes reference to IAN 130/10, DMRB Volume 11, Section 3, Part 4 Ecology and Nature Conservation guidance, and CIEEM guidance (2016) to assess the potential for significant adverse ecological effects that may arise from the Proposed Development.

The Scoping Report identifies potential effects during construction and operation in section 7.5 which include:

- loss, fragmentation and degradation of habitats, including non-statutory designated sites;
- mortality/injury of protected and/or priority species;
- loss of biodiversity;
- disturbance from noise, accidental incursion, light, visual effects and vibration; and
- pollution of habitats (dust, run-off and material deposition).

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	Table 7.5	Internationally designated statutory sites (SAC, SPA, Ramsar)	No internationally designated sites have been found within the study area. Given this, and the nature of the Proposed Development there appears to be limited potential for significant effects. However no information is provided in the Scoping Report regarding the nearest designated sites and particularly the presence of any hydrological linkages to the Proposed Development. The ES should present this information and justification as to why no significant effects could occur. Without this information the Inspectorate cannot agree to scope these designations out of the assessment.
2	Table 7.5	Nationally designated statutory sites (SSSI,	The Applicant states that the Proposed Development will not affect nationally

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		NNR)	designated sites as none exist within 2km of 'the Scheme'. The Inspectorate notes that there may be sites just outside this distance which could experience impacts from the Proposed Development, and sites within and without 2km which could be subject to indirect effects, for example, resulting from hydrological changes or air quality changes. The Inspectorate does not consider there to be sufficient justification in the Scoping Report for excluding significant effects, and advises that impacts on Nationally designated sites must be assessed in the ES.
3	Table 7.5	Locally designated statutory sites	The Applicant states that the Proposed Development will not affect LNRs as there are no LNRs subject to direct land take or immediately adjacent to the development. The Inspectorate considers that indirect impacts on The Manor LNR located 400m west of the development should be assessed, along with any other relevant locally designated statutory sites and does not agree to scope this out of the assessment.
ID	Para	Other points	Inspectorate's comments
4	7.5 Table 8.3, Chapter 8	Potential impacts	The Inspectorate notes that an assessment of required floodplain compensation is likely due to the loss of existing floodplain storage. The ES should assess the impacts associated with the floodplain compensation proposals.
5	7.5 7.7.5	Potential impacts	High level information is presented in the Scoping Report about potential mortality or injury during construction. The risk of mortality or injury to protected/notable species during operation, for example badger and barn owl, is not mentioned and the Inspectorate considers that this should be assessed in the ES.
6	7.10	Potential mitigation measures	The Inspectorate recommends that any proposed mitigation and monitoring measures are agreed as far as possible with relevant consultees including NE and the local planning authorities. The ES should detail all proposed mitigation measures and demonstrate how they will be secured.

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			The Inspectorate notes and supports the commitment to the principles of 'No Net Loss and Net Gain' with regard to ecological compensation and enhancement. ECC have provided advice in their consultation response in Appendix 2 of this Opinion.
7	7.11.1- 7.11.2	Field surveys	<p>The Scoping Report states that the Extended Phase 1 Habitat Surveys were undertaken from "safely accessible land adjacent to the highway network" and that the ecological surveys may have been limited by factors which could reduce their effectiveness. The Applicant should ensure that they have a comprehensive set of ecological surveys sufficient to inform the assessment. Where access or other limitations are encountered, these should be detailed within the ES along with an explanation of how these have been addressed and any remaining implications.</p> <p>The Applicant is referred to the powers available under section 53 of the Planning Act in regard to access for the purpose of surveys.</p>
8	7.5.8 to 7.5.11	Protected species licensing	The ES should confirm whether any EPS licenses and/or mitigation licenses for other protected species would be required. If so, assurance should be provided to the ExA that the necessary license(s) are likely to be obtained. The Applicant should seek to obtain letters of no impediment (LoNI) from Natural England. These should be appended to the ES. The Applicant is referred to the Inspectorate's Advice Note 11, Annex C.

4.4 Road Drainage and the Water Environment

(Scoping Report Chapter 8)

The study area stated in the Scoping Report is a 1km area around 'the Scheme' in accordance with DMRB Volume 11, Section 3, Part 10. The Applicant has indicated that this area of study may be extended where potential effects may warrant this as set out in section 8.2 of the Scoping Report. Waterbodies within the study area are identified in section 8.4. Surface water features are also identified in paragraph 10.4.12 of Chapter 10 to the Scoping Report.

Flood zones 2 and 3 have been identified associated with the Ingrebourne River and Weald Brook, both of which are adjacent to the Proposed Development. The flood risk study area has not been clearly specified and the Applicant indicates that further information is required to set out the floodplain more accurately within the study area.

The assessment will follow DMRB guidance (HD45/09), and the scoping stage assessment has used WebTAG (Department for Transport, December 2015) guidance in order to value receptors. The Scoping Report states that the assessment in the ES will be informed by:

- a desk based review of environmental data including drainage information, daily traffic data and Highways England's water quality modelling known as HAWRAT;
- a Water Framework Directive (WFD) assessment for the proposed works;
- an assessment of water quality of watercourses not designated under WFD or as main rivers in accordance with methods A, B and D of HD45/09;
- a Flood Risk Assessment (FRA) based on National Planning Policy Framework (NPPF), the National Policy Statement for National Networks (NPSNN, 2015) and EA guidance.

The Scoping Report identifies potential effects on surface water quality, groundwater quality and increased flood risk during both construction and operation of the Proposed Development.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	8.4.9	WFD designated lakes	The Applicant has identified no WFD designated lakes within the study area and therefore proposes to scope this matter out from the assessment. The Inspectorate is content that no impacts to WFD designated lakes are anticipated, subject to adequate justification in the ES in particular regarding the adequacy of the study area. The study area must be determined by the extent of the potential impacts.
2	8.4.10	'Hydraulically isolated	It is not clear from the Scoping Report how

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		ponds'	these ponds are isolated from surface water run-off. Changes in surface water run-off in terms of quantity and quality within the catchment of these ponds may be introduced by the Proposed Development and it is not explained how this has been considered. In the absence of this information the Inspectorate cannot agree to scope this matter out.
3	8.4.13	Source Protection Zones (SPZ)	No Source Protection Zones (SPZ) are identified by the Applicant as being located within the study area and therefore the Applicant proposes to scope this matter out of the assessment. The Inspectorate is content that no significant effects could occur, subject to adequate justification in the ES in particular around the adequacy of the study area. The study area must be adequate to capture the extent of potential impacts.
4	8.4.20	Statutory designated sites	The Applicant proposes to scope out an assessment of impacts on statutory designated sites resulting from changes in the hydrological regime. The Applicant states that they will not consider designated sites further in the context of water resources. The points made above (Table 4.3, ID 1-3) are relevant here and the Inspectorate would expect cross reference between the relevant aspect chapters of the ES in providing justification as to why no likely significant effects are anticipated on statutory designated sites.
ID	Para	Other points	Inspectorate's comments
5	8.2.1	Study area	The study area should be clarified in the ES with the water quality and flood risk areas clearly set out, supported by figures where appropriate. The study area must be adequate to capture the extent of potential impacts, both direct and indirect. The study areas should be agreed with the relevant consultees including the EA and the local planning authorities, and justified in the ES.
6	8.4.5	Baseline conditions	The Scoping Report acknowledges that desk study data is limited. The Applicant should engage with consultees in order to obtain information that will inform a robust

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			baseline for the assessment. The Applicant's attention is drawn to information in ECC's response regarding surface water flood risk areas.
7	8.4.21 8.7.3 8.12.3 Table 8.4	Methodology strategy	<p>The Applicant states that data on drainage catchment areas is unavailable at this stage. The Inspectorate would expect to see information on drainage catchment areas, and a robust methodology for the valuation of receptors within the ES.</p> <p>The Applicant should make an effort to agree the assessment methodology used with the relevant consultees. ECC have provided comments on available guidance regarding methodology.</p>
8	8.4.2 8.4.6- 8.4.8 8.6.1 Table 8.3 8.7.6	Water Framework Directive (WFD)	<p>In relation to the requirements of the WFD, and in accordance with the NPSNN, the Applicant should have regard to the current relevant River Basin Management Plan (RBMP), in this case the Thames RBMP, when determining whether the Proposed Development has the potential to impact upon any WFD waterbodies.</p> <p>The Inspectorate supports the preparation of a separate WFD assessment, which clearly explains how the requirements of the WFD have been met. This should be prepared in consultation with the EA. The Applicant's attention is drawn to the Inspectorate's advice note 18 on the WFD.</p>
9	8.5	Potential impacts	The ES should contain details of any proposed surface water drainage strategy, and how this information has been applied to the assessment. The drainage design should take into account the most recent climate change projections available. ECC have provided reference to guidance in their response regarding the design of SuDS to which the Applicant should have regard.
10	8.6.1 Table 8.3	Floodplain compensation	The Applicant indicates that an assessment of floodplain compensation is likely to be required due to loss of natural floodplain storage from the Proposed Development, and an analysis of this will form the basis of a detailed FRA. As with the ecology assessment, any impacts associated with delivery of the floodplain compensation

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			should be assessed within the ES with appropriate cross reference (e.g. any impacts on river flow and freshwater ecology).
11	8.6.1 Table 8.3 8.7.4	Groundwater	The Applicant states that they do not yet know if discharges to ground will be required and the suitability of any method to do so, but that an assessment of potential pollution impacts from any runoff to groundwater may be required. Any impacts associated with discharges to groundwater should be assessed for likely significant effects as part of the ES.
12	8.7.5	Flood Risk Assessment (FRA)	The Inspectorate stresses the need for early discussions with the EA and other relevant statutory consultees regarding the scope of the FRA. Where the FRA has been used to inform the assessment in the ES, this should be clearly set out with cross referencing where appropriate to avoid duplication of information.
13	8.11	Assumptions and limitations	The Inspectorate notes the limitations to data collection identified but advises that the Applicant must ensure that they have a comprehensive set of data to inform their assessment. Where limitations are encountered, these should be detailed within the ES along with an explanation of how they have been addressed.

4.5 Landscape and Visual

(Scoping Report Chapter 9)

The Scoping Report identifies that a study area of 1.5km from 'the perimeter of the Scheme' as sufficient to identify potentially significant landscape effects, and applies the same study area to the assessment of visual effects.

The Scoping Report states that the assessment methodology will be based on the guidance contained in IAN 135/10 Landscape and Visual Effects Assessment and DMRB Volume 11, Section 2 Environmental Impact Assessment. A Detailed Assessment under the DMRB is proposed. The Scoping Report states that consideration will also be given to the methodology within the Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd edition, published by the Landscape Institute and Institute of Environmental Management and Assessment (2013).

The Scoping Report identifies potentially significant effects on landscape character and visual amenity during the construction and operational phases.

The Inspectorate has provided comment on matters that the Applicant has proposed to scope out of the ES.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	9.2.1	Landscape and visual receptors beyond 1.5km from the perimeter of the scheme	<p>The meaning of 'the perimeter of the scheme' is not defined in the Scoping Report, and no evidence is provided for the appropriateness of a 1.5km study area. It is not clear if the study area has included all features of landscape value which could be affected. It is not clear how the 1.5km relates to determining a ZVI for the assessment. Without this information, the Inspectorate cannot agree to scoping these receptors out at this stage. The ES must define and justify the study area applied and ensure that the impacts of the Proposed Development are assessed.</p> <p>The LBH have provided comment on this matter and the Inspectorate advises that the Applicant should make effort to agree the study area for the assessment with relevant consultees.</p>
2	9.6.6 Table 9.2	Landscape effects on Warley, St Faith's and Weald Country Park	<p>Given the uncertainty regarding the study area applied, and that limited evidence to support scoping this matter out has been presented in the Scoping Report, the Inspectorate cannot agree to scope this</p>
3	Table	Weald Park (Grade	

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	9.2	II) Registered Park and Garden	<p>matter out and therefore it must be assessed in the ES.</p> <p>The Inspectorate notes that further assessment of Weald Park will be undertaken as part of the ES Cultural Heritage aspect chapter (paragraph 11.4.7 of the Scoping Report) and advises that appropriate cross-reference is made in the ES between the relevant chapters.</p>
4	9.6.7 Table 9.3	Visual effects on employees at Telecommunications Head Office and nearby residential properties in Brentwood	Reasoning is provided in Table 9.3, that in each case these receptors will not be subject to significant visual effects due their distance from the Proposed Development preventing views or due to existing screening features preventing views.
5	Table 9.3	Visual effects on Boyles Court, Grade II Listed building	The Inspectorate does not consider that sufficient information has been provided in the Scoping Report to demonstrate that impacts to these receptors would not occur. In the absence of this information the Inspectorate does not agree that these receptors can be scoped out.
6	Table 9.3	Visual effects on residential receptors to the north east including Lake House, Colmar Farm, Colmar, Park Farm and Halfway House	The Applicant should seek to establish a robust study area based on the extent of the likely impacts and should agree with relevant consultees which receptors should be included in the assessment. It is likely to be helpful to consultees to provide appropriate figures depicting the study area and ZVI when established, as well as the location of receptors.
7	Table 9.3	Visual effects on residential receptors located on Nag's Head Lane linking Brook Street area with Tyler's Common to the south of Junction 28	
8	Table 9.3	Visual effects on residential receptors to the north east of the M25 in South Weald situated along Wigley Bush Lane	
ID	Para	Other points	Inspectorate's comments
9	General	Study area	In connection to comments above, the Inspectorate advises that the study areas for the landscape assessment and the visual assessment need to be justified and efforts made to agree these with the

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			relevant consultees. The Inspectorate notes the intention in paragraph 9.9.1 to consult on the location of viewpoints, photomontages, and the extent of the visual envelope. The Inspectorate agrees that this approach should be followed and that the ES should explain how this approach informed decisions taken in regards to the assessment.
10	9.4	Baseline conditions	The Applicant should ensure that the baseline conditions used to inform the assessment are complete and robust. Information should be sought from the relevant consultees, and the Inspectorate advises the Applicant to have regard to the response from ECC which provides information on local sites of landscape interest.

4.6 Geology and Soils

(Scoping Report Chapter 10)

The study area for the assessment of geology and soils is given in the Scoping Report as extending 250m from 'the red line boundary' and has been based on professional judgement (section 10.2).

The assessment methodology proposed makes reference to a number of Environment Agency (EA) guidance documents, the EIA Guide to Good Practice (DCLG, 2006), and National House Building Council guidance (2008). A Preliminary Conceptual Site Model (PCDM), desk studies and Generic Quantitative Risk Assessment (GQRA) will be utilised to assess the potential impacts on geology and soils from contamination. The contaminated land risk classification and criteria to be applied are outlined in Tables 10.1 – 10.4 and section 10.7.3, of the Scoping Report and are based on the guidance above. Effects on agricultural soils will be assessed following the approach in the DMRB and by developing a bespoke system.

Potential impacts are outlined in section 10.5 of the Scoping Report and include; contamination of the surrounding soils, hydrology and hydrogeology, the creation of new contamination pathways, to exacerbate existing or to create new areas of ground instability and compressible grounds, and to cause migration of underground gases.

The Inspectorate has provided comments on matters that the Applicant has set out as being scoped out of the EIA.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	10.6.4 and Table 10.5	Geology as Valuable Resource	The Inspectorate agrees that this can be scoped out due to the absence of mineral resources, geological SSSI or local geological sites (LGS) within the study area, and therefore the absence of pathways by which significant effects could occur.
2	10.6.5 and Table 10.5	Re-use of soils and waste soils	The Scoping Report proposed to assess this matter in the Materials and Waste aspect chapter and on that basis it is scoped out of this assessment. However, the Inspectorate has not found any evidence that this matter is to be assessed in the Materials and Waste chapter. The Inspectorate requires that the ES includes an assessment of impacts associated with the re-use and disposal of soils, should the potential for likely significant effects be identified.

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ID	Para	Other points	Inspectorate's comments
3	10.2.1	Study Area	The ES should include an explanation as to how the study areas have been defined and detail the supporting reasoning. In particular the explanation should include how it appropriately accounts for impact resulting from increased mobility of ground contaminants.
4	10.6	Proposed Level and Scope of Assessment	The Scoping Report states that ground investigation (GI) work will be undertaken and used to inform the scheme design (including mitigation design). However, the Scoping Report also implies that this information will not be used to inform the baseline assessment in the ES. The Inspectorate considers that the baseline assessment in the ES should be established using the most appropriate information available and this should include results from any relevant GI work undertaken.
5	10.7.2	Proposed Assessment Methodology	The Inspectorate also considers that any assessment of contamination risk should be undertaken having regard to information obtained from the GI work referred to above. The relevant GI information should be included as an appendix in the ES to support the reader.
6	10.7.8	Proposed Assessment Methodology	The Inspectorate notes that the receptors 'nearby residential properties' and 'nearby workers' have no clear definition in the Scoping Report. A description, in line with the justified study area, should be provided within the ES.
7	10.11.2	Assumptions and Limitations	The ES should ensure that all impacts which may result in a likely significant effect have been appropriately assessed. All survey works necessary to inform this assessment should be undertaken prior to an application being made and should be used by and reported within the assessment in the ES. If detailed GI work is required for this purpose it should be undertaken in advance of any proposed application.
8	N/A	Figures	The ES should include figures where relevant to support the textual description of the receiving environment and nearby receptors.

4.7 Cultural Heritage

(Scoping Report Chapter 11)

The study area applied in the Scoping Report is 500m surrounding the 'construction boundary'. A number of Listed Buildings, Weald Park (Grade II Registered Park and Garden), and two Conservation Areas associated with the town of South Weald are present within the Study Area. Designated and non – designated heritage assets are presented in Figures F-1 and F-2 in Appendix F of the Scoping Report.

The Scoping Report makes reference to desk study data being obtained from Historic England and local authority sources. The proposed methodology is to be carried out in line with the guidance provided in the DMRB HA 208/07. A site visit has also been carried out but the detailed results are not reported in the Scoping Report. The Scoping Report makes commitment to further consultation to inform the ES.

Potential significant effects are identified in terms of construction on non-designated assets and on unknown buried archaeological remains within the site construction footprint. Known heritage assets that could be affected are presented in Table 11.1.

The Inspectorate has provided comment on matters that the Applicant has proposed to scope out of the ES.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	11.4.6	Effects to setting of Listed Buildings (except Stony Hills Farm)	The figures presented in the Scoping Report (Figure F-1 and F-2) do not label the listed buildings by name and it is not possible to be confident in the justification provided in the Scoping Report that none of the Listed Buildings identified, except Stony Hills Farm, share intervisibility to and from the Proposed Development. No Zone of Visual Influence (ZVI) is set in the Scoping Report and no reference is made to how one will be determined. The Inspectorate cannot agree to scope this matter out on the basis of the information in the Scoping Report. The Inspectorate advises all assets likely to experience impacts on their setting are included in the assessment.
2	11.4.20	Effects on Historic Landscape	The Inspectorate is aware that the Proposed Development would introduce new visually prominent structures which may impact upon the historic landscape. The Inspectorate does not agree that the justification provided in the Scoping Report

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			is sufficient to support a decision to scope out the assessment of impacts on historic landscape. The LBH and ECC have also provided comment on this matter in their consultation responses, which the Applicant should take into account.
ID	Para	Other points	Inspectorate's comments
3	11.2.1	Study area	<p>The study area applied to the assessment in the ES must be clearly defined and described reflecting the extent of the anticipated impacts. The Applicant should seek agreement with relevant consultees regarding the appropriate study area. The Applicant should take into account the comments made by LBH and ECC in this regard.</p> <p>The Inspectorate recognises that there is likely to be an inter-relationship between the study area applied to this aspect and other aspects such as the landscape and visual impact assessment, and recommends that appropriate cross-reference is made in the ES.</p>
4	11.4	Baseline conditions	The baseline assessment in the ES should include relevant information on local and regional heritage assets. The Inspectorate refers the Applicant to information received from the Greater London Archaeology Advisory Service (GLAAS) and the LBH regarding assets not yet recorded on the Greater London HER and the Havering Local Heritage List. This information should be obtained and taken into account in the baseline assessment in the ES.
5	11.7 and 11.9	Methodology	The Applicant should seek to agree the methodology with relevant consultees, and have regard to the points raised by LBH and ECC particularly with regards to the guidance available to inform the assessment.
6	11.5.1 and 11.5.3	Impacts to setting of designated heritage assets	The assessment of impacts on setting of designated heritage assets should take into account changes in air and noise pollution. The Inspectorate is aware that the Proposed Development may increase air and noise pollution during construction and operation and this should be considered in the assessment of impacts to setting of

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			heritage assets. ECC and the LBH have also provided advice in their responses in this regard which the Applicant should take into account.
7	11.10	Mitigation measures	The Applicant should provide details in the ES of avoidance measures and the specific mitigation measures designed ameliorate any significant effects. Preservation in situ is not mentioned as a potential mitigation measure in this section, and the Inspectorate considers that this should be investigated. Comments on this matter have been provided by GLAAS in their response and the Applicant should have regard to these.
8	11.11.1	Assumptions and limitations	<p>Many of the assertions in this section regarding the baseline and value of features, and regarding the impacts of the as yet unknown elements of the Proposed Development (eg the location of construction compounds) seem premature in advance of the assessment being carried out.</p> <p>The Inspectorate advises that these assumptions are critically reviewed during the assessment process, taking into account up to date design information and consultation responses. The LBH have also made comment on this matter in their response and the Applicant should have regard to this.</p>

4.8 Materials and Waste

(Scoping Report Chapter 12)

The study area for material resources includes the demand for construction materials nationally. For waste, the study area includes the waste arisings and waste infrastructure capacity within the county of Essex with the exception of hazardous waste which is considered on a national level. Section 12.2 of the Scoping Report describes the study area.

The methodology uses guidance from IAN 153/11 and a quantitative desk study to assess the impacts that material resources and waste have on the study areas. The waste and materials classifications and criteria that are related to the associated environmental effects are found in section 12.7, Table 12.5 of the Scoping Report. These will be combined in order to determine the significance of effects. The criteria take into account the baseline data which is found in Table 12.1 National Material Resources Baseline, Table 12.2 Waste Arising Baseline, and Table 12.3 Waste Infrastructure Baseline of the Scoping Report. Potential Impacts include those on the market for construction materials, the reduction in landfill capacity in Essex County Council, and the reduction in capacity for hazardous waste treatment. Section 12.5 provides a full description of potential impacts.

The Inspectorate has provided comments on matters that the Applicant has set out as being scoped out of the EIA.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	12.6.5 Table 12.4	Change in demand for construction materials during the operation phase	The Inspectorate agrees that this matter can be scoped out due to it being unlikely that the operational phase of the Proposed Development will result in significant effects on the market for construction resources.
2	12.6.5 Table 12.4	Change in baseline regional waste arisings during the operation phase	The Inspectorate accepts that the waste generated during the operational phase of the Proposed Development will have a minimal effect on the study area's waste baseline. As a result the Inspectorate considers that significant effects are not anticipated, and that this matter can be scoped out.
3	12.6.5 Table 12.4	Change in capacity of regional waste infrastructure during the operational phase	The Inspectorate accepts that the waste generated during the operational phase of the Proposed Development will have a minimal effect on the study area's waste infrastructure, and considers that significant effects are unlikely to occur and this matter can be scoped out.
ID	Para	Other points	Inspectorate's comments

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4	12.4	Baseline Conditions	No reference to future baseline is made in this section, and the Applicant should have regard to paragraph 3.3.12 of this Opinion. The future baseline applied should be consistent with that applied to the other environmental aspect assessments in the ES. ECC have provided some advice in their response regarding local mineral and waste planning policy, which the Applicant should take into account when predicting future baseline conditions.
5	12.4.4 and 12.4.5	Baseline Conditions	The Scoping Report states that regional information on material resources associated with construction, demolition and excavation (CD&E) is not available. The Applicant should make effort to obtain quantitative baseline data applicable to the assessment where this is available.
6	12.5.2	Potential Impacts	The Scoping Report states that Table 12.2 presents the amount of waste produced during the CD&E phase of the scheme. However, paragraph 12.4.11 states that Table 12.2 represents the regional CD&E waste generated in 2017. The Applicant should ensure that the information on which the assessment will be based is clearly set out in the ES, with the use of appendices where appropriate.
7	12.7.5	Proposed Assessment Methodology	Regarding key construction materials, this section indicates that they will be considered within the assessment, but that their sensitivity cannot be assessed. The ES should clearly explain how the assessment will approach the sensitivity of construction materials. The Applicant should make effort to obtain quantitative data to inform the assessment. Any professional judgement applied should be clearly explained and justified.
8	12.7.6, Table 12.5	Proposed Assessment Methodology	The Scoping Report explains how sensitivity and magnitude combine to produce a level of effect, stating 'very large to moderate effects are considered to have the potential to be significant, while slight and neutral effects are not considered significant'. Table 12.5 of the Scoping Report presents differently worded 'levels' and does not define how the combination process is to be carried out. The ES should include a clear methodology explaining how

Scoping Opinion for
Proposed M25 Junction 28 Improvement

			significant effects will be assigned.
9	N/A Refer to 10.6.5 in Table 4.6 above.	Re-use of soils and waste soils	The Scoping Report (paragraph 10.6.5) states that this matter is addressed in this aspect chapter. However, the Inspectorate notes that no information is provided. The Inspectorate requires that the impacts associated with storage and disposal of soils should be assessed in the ES. Cross-reference to other aspect chapters should be made where applicable (eg where potential impacts to water quality are identified).

4.9 People and Communities

(Scoping Report Chapter 13)

The spatial scope applied for the assessments in this aspect area is set out in section 13.2 of the Scoping Report. For the assessment of impacts on travellers, PRow, cycle paths and footpaths the study area is proposed to be 500m from 'the Scheme'. The study area for land and property considers the area of the development and the 'immediately adjacent' area. The Scoping Report states that the assessment of community severance applies a wider study area to include land and properties accessed by affected roads and paths.

The assessment uses guidance in DMRB Volume 11 Section 3 to consider the impacts of the Proposed Development on people and communities. It combines the Non-Motorised User and Community Effects components of Part 8, Part 9 for impacts on Vehicle Travellers, and Part 6 for Land Use impacts.

The Scoping Report states that no site visits will be undertaken; the assessment will be carried out based on the findings of desk based studies, knowledge from local stakeholders and knowledge from previous schemes of a similar nature.

The scoping report identifies potential impacts relating to views from the road and driver stress for motorised travellers; potential impacts of community severance and changes in accessibility; and impacts on land and property including demolition and land-take.

The Inspectorate has provided comments on matters that the Applicant has set out as being scoped out of the EIA.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	Table 13.7	Community land and facilities	The Scoping Report states that as no community land or facilities are required to construct the Proposed Development, that direct impacts on them will not be considered. The Inspectorate understands from the information in the Scoping Report that indirect impacts to amenity and effects of severance will largely be addressed separately in this and in other aspect chapters. However, no information is presented regarding how the Proposed Development will impact community land and facilities by changes to traffic flows on the road network. Therefore the Inspectorate does not agree to scope this out and advises the Applicant that this matter must be assessed in the ES.
2	Table	Impacts relating to	The Applicant should have regard to the

Scoping Opinion for
Proposed M25 Junction 28 Improvement

	13.7	risks of major accidents and/or disasters	comments in paragraph 3.3.21 of this Opinion above. Based on the characteristics of the Proposed Development, and without detailed justification being provided in the Scoping Report, the Inspectorate cannot agree to scope this matter out.
3	13.6.4	Impacts on equestrians	The Scoping Report states that no bridleways are located within the study area and, a 2014 study of non-motorised users suggested negligible equestrian use of paths in the area (no equestrians were recorded). Subject to this remaining the case in light of future refinements to the study area and updated baseline information, the Inspectorate agrees to scope this out.
ID	Para	Other points	Inspectorate's comments
4	13.2.1	Study area	The study area for land and property is described in the scoping report as being the area immediately adjacent to 'the Scheme'. The study area for community severance is described as comprising affected roads and paths which provide access to community assets. These study areas are not defined in the Scoping Report and the Applicant must ensure that the area assessed is clearly defined in the ES. The Applicant should make an effort to agree the study area with consultees, and the Inspectorate notes that detailed comment on locally and regionally affected routes is provided by ECC in their response.
5	13.5.2 Table 13.7	Impacts on non-motorised users	The scoping report states that paths will remain open during construction and that the design of the Proposed Development will seek to maintain access for cyclists and pedestrians. The ES should provide details of these measures where they represent fixed design constraints on which the assessment will be based. The Inspectorate notes that non-motorised user baseline information will be desk-based and dates from 2014. The Inspectorate advises the Applicant to ensure the baseline information is as up to date as possible, and information should be sought from local planning authorities and other relevant consultees in this regard.

Scoping Opinion for
Proposed M25 Junction 28 Improvement

6	13.5	Impacts	Adverse impacts from construction have been identified as temporary. The ES should explain the duration of impacts and what constitutes temporary impact.
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4.10 Climate Change

(Scoping Report Chapter 14)

The study area for greenhouse gas (GHG) emissions is defined with respect to the lifecycle stages of Section 7 of PAS 2080:2016 (Publicly Available Specification (PAS), published by the British Standards Institution (2016). Further details of the lifecycle stages related to the study area are set out in Table 14.1 of the Scoping Report.

The study area for the assessment of the Proposed Development's vulnerability to climate change is the Met Office UK Climate Projections 25km grid area (Figures 14.1 and 14.2 of the Scoping Report). The Scoping Report also states that the study area comprises off-site transportation, energy use and waste processing.

Greenhouse gas emissions will be quantified by the Applicant following PAS 2080. The proposed methodology will be based on a desk based assessment to quantify the magnitude of emissions and determine the significance of effects based on criteria set out in paragraph 14.7.6 of the Scoping Report and following DMRB guidance. The Applicant states that guidance for determining significance will be revised and updated for the ES.

The assessment with respect to climate change vulnerability is based on data from UKCP09 climate change projections which will be updated when UKCP18 projections are available. Table 14.10 contains a summary of the climate change projections from UKCP09.

Potential climate change impacts on "road infrastructure receptors" (paragraph 14.5.4) are set out in Table 14.8.

GHG impacts are considered as the quantities of emissions which occur from each life-cycle stage or as a sub-activity during each stage. Operational reductions in energy use and traffic emissions will be measured relative to the baseline emissions based on data in the ES.

The Inspectorate has provided comments on matters that the Applicant has set out as being scoped out of the EIA.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
1	14.2.3	Preliminary studies and consultations; direct operational GHG emissions; operational water use; other processes; end of life.	Noting that the Scoping Report predicts minimal/negligible GHG emissions associated with these matters, and given the nature of the Proposed Development, it is agreed that significant effects are unlikely to arise, but the Inspectorate asks that the evidence for excluding these processes is included in the ES.

Scoping Opinion for
Proposed M25 Junction 28 Improvement

2	14.12.2 Table 14.16	Average (air) temperature change (annual, seasonal, monthly)	<p>Having considered the nature of the Proposed Development and the information in the Scoping Report stating that it will have low climate vulnerability, the Inspectorate considers that significant effects are unlikely to occur. The Inspectorate is therefore content for this matter to be scoped out of the ES.</p> <p>The ES must make reference to, with appropriate detail, the design constraints and standards on which the conclusions of low climate vulnerability have been based.</p>
3	14.12.2 Table 14.16	Average wind speed change (annual, seasonal, monthly)	
4	14.12.2 Table 14.16	Humidity	
5	14.12.2 Table 14.16	Sea level rise (plus local land movements), storm surge/tide	
6	14.12.2 Table 14.16	Water availability/drought	
7	14.12.2 Table 14.16	Average precipitation (annual, seasonal, monthly)	
8	14.12.2 Table 14.16	Storms (tracks and intensity), including storm surge	<p>Given the nature of the Proposed Development, in particular the presence of two watercourses and their associated floodplains, the Inspectorate considers that these matters have the potential to affect the design of the proposals. Therefore, the Inspectorate advises that these matters should be assessed in the ES. The Applicant should clearly state the range of climate projections used for the purposes of any adaptation or resilience assessment, taking into account the anticipated updated projections in 2018.</p>
ID	Para	Other points	Inspectorate's comments
9	14.2.4	Study area data	<p>The Inspectorate notes that the study area will be dependent on the availability of design and construction information and if this data is unavailable, part or all of the affected lifecycles will be excluded from the assessment. The study area must be determined by the extent of the predicted impacts of the Proposed Development, and if applicable based on professional judgement in the absence of known data.</p> <p>If necessary the ES should clearly set out the assumptions applied to this assessment in place of this information, and any implications that exist for the robustness of the assessment.</p>

Scoping Opinion for
Proposed M25 Junction 28 Improvement

10	14.7 Table 4.1 Table 4.2	Significance of effects	<p>The Inspectorate notes that there is currently no specific guidance for carbon emission thresholds, which if exceeded, is considered to be significant. The ES should therefore set out the criteria used to report on the significance of effects.</p> <p>The assessment of significance in the ES should be placed in context to the UK carbon budgets, the associated reduction targets, and in the context of the climate resilience of wider systems over time (as stated in paragraph 14.7.8 of the Scoping Report).</p>
11	14.7.1- 14.7.6	Calculation of greenhouse gas emissions	<p>The Scoping Report states that the Applicant will use the Atkins Carbon Knowledgebase (CKB) software to calculate emissions during all the lifecycle of the Proposed Development. Details of this carbon calculation and analysis software tool should be provided within the ES.</p>
12	14.7.16 - 14.7.17	Climate resilience assessment	<p>The Scoping Report does not explicitly set out the methodology that will be used to assess the resilience of the Proposed Development to climate change. The methodology should be set out within the ES.</p>
13	14.11.1 - 14.11.2	Assumptions and limitations	<p>The Applicant states that for consultation purposes a detailed emissions assessment is not required and where project specific data is unavailable, suitable proxy data will be used where engineering and construction expertise can be obtained to generate this data. The Inspectorate advises that the Applicant should consult with relevant stakeholders on what data they would require for consultation purposes.</p>

4.11 Assessment of Cumulative Effects

(Scoping Report Chapter 15)

The study area encompasses all trunk road and motorway projects identified by the Applicant as being confirmed, development projects with valid planning permissions, applications for consent which have been made, allocated sites in emerging or adopted Local Plans, and other applications which could have implications for the project within the geographical area and thresholds set out in paragraph 15.2.3 and identified in Table 15.2 of the Scoping Report.

The assessment will follow guidance contained in DMRB Volume 11 Section 2 Part 5 (HA 205/08) and PINS advice notes. The Scoping Report states that the traffic model will take account of the operational effects of major developments in the area and surrounding region.

Cumulative effects from the interaction of the aspects of the Proposed Development identified in the ES and cumulative effects assessed in combination with the other developments are considered in section 15.3 of the Scoping Report. The potential for cumulative impacts arising from the M25 Junction 28 Interchange and the projects identified by the Applicant will be considered as part of the assessment within each section of the ES.

ID	Para	Applicant's proposed matters to scope out	Inspectorate's comments
	N/A	None identified	N/A
ID	Para	Other points	Inspectorate's comments
1	15.4.4 Table 15.2	Zone of Influence / Study Area	The zone of influence or study areas for cumulative effects for environmental aspects of the Proposed Development should be fully explained and justified in the ES. The Inspectorate advises that the Applicant adopt the approach detailed in Advice Note 17, including when determining the list of other developments to take into account in the assessment. The Applicant should make an effort to seek information and agreement from consultees. The LBH and ECC have provided advice regarding the cumulative assessment in their responses.
2	15.4.7 Table 15.3	Significance of cumulative effects	The Applicant should provide a clear description and justification in the ES of how significant effects have been determined. This should include a definition of the terms 'short-term', 'long-term', and 'temporary'.

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures. These include:

- Pre-application prospectus³
- Planning Inspectorate Advice Notes⁴:
 - Advice Note Three: EIA Notification and Consultation;
 - Advice Note Four: Section 52 Obtaining information about interests in land (Planning Act 2008);
 - Advice Note Five: Section 53 Rights of Entry (Planning Act 2008);
 - Advice Note Seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping;
 - Advice Note Nine: Using the 'Rochdale Envelope';
 - Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
 - Advice Note Twelve: Transboundary Impacts;
 - Advice Note Seventeen: Cumulative Effects Assessment; and
 - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended).

³ The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

⁴ The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES⁵

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	Havering Clinical Commissioning Group
	NHS Basildon and Brentwood Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England – East of England
	Historic England – Greater London
The relevant fire and rescue authority	Essex County Fire and Rescue Service
	London Fire Brigade
The relevant police and crime commissioner	Mayor’s Office for Policing and Crime (MOPAC)
	Police Fire and Crime Commissioner for Essex
The Environment Agency	The Environment Agency - North London
The Relevant Highways Authority	Essex County Council
	London Borough of Havering
The relevant strategic highways company	Highways England - East of England
Transport for London	Transport for London
Public Health England	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Secretary of State for Defence	Ministry of Defence

⁵ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the ‘APFP Regulations’)

TABLE A2: RELEVANT STATUTORY UNDERTAKERS⁶

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	Havering Clinical Commissioning Group
	NHS Basildon and Brentwood Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
	London Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Road Transport	Transport for London
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes and Communities Agency
The relevant Environment Agency	The Environment Agency - North London
The relevant water and sewage undertaker	Affinity Water
	Affinity Water (East region)
	Affinity Water (Southeast region)
	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited

⁶ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (as amended)

STATUTORY UNDERTAKER	ORGANISATION
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	Wales and West Utilities Ltd
The relevant electricity distributor with CPO Powers	Energetics Electricity Limited
	ESP Electricity Limited
	G2 Energy IDNO Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Peel Electricity Networks Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Utility Distribution Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))⁷

LOCAL AUTHORITY⁸
Basildon District Council
Brentwood Borough Council
Cambridgeshire County Council
Chelmsford City Council

⁷ Sections 43 and 42(B) of the PA2008

⁸ As defined in Section 43(3) of the PA2008

LOCAL AUTHORITY⁸
Enfield Council
Epping Forest District Council
Essex County Council
Hertfordshire County Council
London Borough of Barking and Dagenham
London Borough of Bexley
London Borough of Havering
London Borough of Redbridge
Medway Council
Southend-on-Sea Borough Council
Suffolk County Council
Thurrock Borough Council
Waltham Forest Council

THE GREATER LONDON AUTHORITY

The Greater London Authority (GLA) have also been identified as a consultation body under the EIA Regulations because the proposed application relates to land within Greater London.

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

Consultation bodies who replied by the statutory deadline:

Anglian Water Services Ltd
Chelmsford City Council
Environment Agency
ESP Gas Group Ltd
Essex County Council
Health and Safety Executive
Historic England
London Borough of Bexley
London Borough of Havering
National Grid
Public Health England
Royal Mail
Wales and West Utilities Ltd



Anglian Water Services Ltd
Thorpewood House,
Thorpewood,
Peterborough
PE3 6WT
Tel (0345) 0265 458
www.anglianwater.co.uk
Our ref M25J28
Your ref TR010029-000004

FAO Gail Boyle
Senior EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Sent by e-mail
8 December 2017

Dear Ms Boyle,

**M25 Junction 28 improvements
Environmental Statement Scoping Report**

Thank you for the opportunity to comment on the scoping report for the above project.

Anglian Water is the water and sewerage undertaker for the proposed site. The following response is submitted on behalf of Anglian Water.

Project description

Reference is made to the realignment of the existing slip road and the realignment of an existing watercourse.

At this stage it is unclear whether there is a requirement for potable water and wastewater services. The extent of realignment needs to be reviewed in detail by Anglian Water to understand what requirements by the Developer are sought during the duration of the realignment and construction phases and the extent to which existing water and water recycling assets would be affected.

This will need to be defined with the assistance of Anglian Water.

Anglian Water would welcome further discussions with the applicant prior to the submission of the Draft DCO for examination.

In particular it would be helpful if we could discuss the following issues:

- Wording of the Draft DCO including protective provisions for the benefit of Anglian Water.
- Requirement for potable (clean) water and wastewater services.
- Impact of development on Anglian Water's assets and the need for mitigation.
- Pre-construction surveys.

Ground conditions and contamination

It is essential to protect the public water supply sources from contamination from any activities that might cause pollution, both during construction and when operational. Reference is made to the realignment of a watercourse. Consideration should be given to the location of existing boreholes in the ownership of Anglian Water.

Water Resources and Flood Risk

Reference is made to the evidence provided by the Environment Agency in relation to the risk of fluvial and surface water flooding. Anglian Water is responsible for managing the risks of flooding from surface water, foul water or combined water systems. Consideration should be given to all potential sources of flooding including sewer flooding.

Asset encroachment

It is suggested that the Environmental Statement should include reference to the foul sewerage network, sewage treatment and water services.

The Environmental Statement should include reference to Anglian Water's existing assets and any potential impacts from the above development. We would expect any requests for alteration or removal of foul sewers or water mains to be conducted in accordance with the Water Industry Act 1991.

Anglian Water is keen to work with the Developer to understand the full impact of the project.

Maps of Anglian Water's assets are available to view at the following address:
<http://www.digdat.co.uk/>

Should you have any queries relating to this response please let me know.

Yours sincerely

Kathryn Taylor

Major Infrastructure Planning Manager

Anglian Water Services Limited

Water Resources and Strategic Planning Team

Thorpe Wood House,

Thorpe Wood, Peterborough, PE3 6WT

Mobile: 07802 857448

From: [HILL-SANDERS, Sarah](#)
To: [M25 Junction 28](#)
Subject: Application by Highways England for an order granting Development Consent for the m25 Junction 28 improvements
Date: 07 December 2017 09:23:23

Dear Sir/Madam

Your Reference TRO 10029-000004

I can confirm that Chelmsford City Council has no comments to make in relation to the Planning Inspectorate adopting its Scoping Opinion.

Kind regards

Sarah Hill-Sanders

Development Manager

Development Management
Chelmsford City Council
Tel: 01245 606551
www.chelmsford.gov.uk

Speaking to us about building work or development? Have you spoken with our Building Control Service too? Our team can help you meet Government-set Building Regulations for the safe design and construction of buildings (including energy efficiency and access requirements). You can look at our [website](http://www.chelmsford.gov.uk) or, alternatively, email them on building.control@chelmsford.gov.uk or telephone 01245 606431 for more information.

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From: [HNL Sustainable Places](#)
To: [M25 Junction 28](#)
Subject: EA Automated Response
Date: 14 November 2017 12:23:26

Thank you for your email. We will usually respond within 21 days, unless we agree another timescale with you. However, please be aware that our team is currently experiencing short term resource pressures. We will endeavour to provide a response to your enquiry as quickly as possible.

If you'd like to speak to a planning advisor directly, please contact us on the numbers below.

Useful links for councils and developers

- Consulting the Environment Agency for planning advice: webpages for [councils](#) and [developers](#)
- [Flood Risk Standing Advice](#)
- [Building a Better Environment](#) – advice for developers

Kind regards

The Hertfordshire and North London Sustainable Places Team
Environment Agency
HNL Sustainable Places@environment-agency.gov.uk

For advice on development proposals in:	Contact	Number
Barking and Dagenham, Havering, Newham, Redbridge	Andy Goymer	0203 025 5486
Barnet, Harrow, Hillingdon	Emily Federici Tricia Devonshire	0208 474 7636 0203 025 9188
Brent, Ealing, Hammersmith & Fulham, Hounslow, Westminster	Ed Crome	0208 474 5538
Broxbourne, East Herts, Epping Forest, Harlow, Hertsmere, St Albans, Watford	Thomas Campbell	0208 474 7633
Camden, City of London, Islington, Kensington & Chelsea	Scott Hawkins Wioleta Osior	0208 474 8339 0203 025 5620
Chiltern, Dacorum, North Hertfordshire, South Bucks, Stevenage, Three Rivers, Welwyn Hatfield	Kai Mitchell	0203 025 9074
Enfield, Hackney, Haringey, Tower Hamlets, Waltham Forest	Eleri Randall Jane Wilkin	0203 025 5516 0203 025 5538
Luton	Caroline Court Deborah Simons	0203 025 8984 0203 025 9020

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From: [ESP Utilities Group Ltd](#)
To: [M25 Junction 28](#)
Cc: [Gail Boyle](#)
Subject: Your Reference: TR010029-000004. Our Reference: PE133452. Plant Not Affected Notice from ES Pipelines
Date: 28 November 2017 15:46:30

M25 Junction 28
The Planning Inspectorate

28 November 2017

Reference: TR010029-000004

Dear Sir/Madam,

Thank you for your recent plant enquiry at (TR010029-000004).

I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.

ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espipelines.com

Yours faithfully,

Alan Slee
Operations Manager



Bluebird House
Mole Business Park
Leatherhead
KT22 7BA

☎ 01372 587500 📠 01372 377996

<http://www.espug.com>

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FAO Ms Gail Boyle
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol,
BS1 6PN

Our ref: ECC/M25J28/Scoping
Opinion
Your Ref: TR010029-000004
Date: 11 December 2017

Sent by email: M25Junction28@pins.gsi.gov.uk

Dear Ms Gail Boyle,

RE: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Proposed application by Highways England (the Applicant) for an Order granting Development Consent for the M25 Junction 28 improvements

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for the opportunity to respond on behalf of Essex County Council (ECC) defined as S43 Local Authority and statutory consultee, to provide comments on the Scoping Report to inform the Environmental Statement (ES) for the proposed development for M25 Junction 28 improvements by Highways England (HE).

ECC is a Statutory Consultee, as both a host and neighbouring strategic authority within the definition of the Duty to Co-operate S110 of the Localism Act 2012 and Section 30 of the Planning and Compulsory Purchase Act 2008. The M25 Junction 28 improvements are a strategic cross-boundary matter and ECC wish to engage with this process, with the following relevant roles:

- A key partner and service provider within Essex promoting economic development, regeneration, infrastructure delivery and new development for the benefit of Essex and the region;
- The highways and transportation authority for Essex, with responsibility for the delivery of the Essex Local Transport Plan;
- The Minerals and Waste Planning Authority and Lead Local Flood Authority for Essex;
- The Public Health advisor for the county of Essex; and
- The Local Education Authority for Essex and as a key partner in the promotion of employability and skills.

ECC has a long history of close working with authorities within Greater Essex, within London Thames Gateway; South East Local Enterprise Partnership (SELEP) and the Opportunity South Essex Partnership (OSE). It will be necessary for HE to have regard to the wider regional priorities, as set out by ECC, SELEP and OSE.

ECC has been actively engaged with HE throughout the process to date including our response of 6th January 2017 which supported Option 5F, in which we stated:

- A12 transport corridor is key to prosperity and vitality of Essex, connecting rapidly growing urban centres of Chelmsford and Colchester with London and the Haven Ports
- Effective connectivity between A12 and M25 at Junction 28 is essential to Essex
- Support HE congestion and safety improvements at M25 Junction 28
- Option 5F offers longer term network resilience, and will enhance connection between M25 and A12, and together with widening of A12; will assist and enable future development and economic growth of Essex
- Long term network benefits will outweigh any short term construction inconvenience
- Appropriate traffic management and minimal disruption needed during construction (Options 5F could mainly be built offline, minimising day to day impact and disruption to A12 and J28)
- Ensure impact on traffic exiting southbound from Brentwood on the A1023 Brook Street are carefully considered, and existing traffic congestion at this junction is not compromised as a result of the scheme
- Request introduction of signals at this arm of junction, and consideration of potential incorporation within signal phasing for M25 Junction 28
- Consideration given to public Byway which crosses southern end of A1023, runs south of Poplars and crosses M25 slip-road onwards to Putwell Bridge Farm and Oak Farm, to south of M25 (route forms part of ECC and BBC's ambition to improve and connect cycling / walking networks across Essex)
- Need for ECC and HE to continue sharing traffic forecasting and modelling data in area of M25 Junction 28; and to work with Brentwood Borough Council to cater for the future growth proposed in the Brentwood urban area

ECC wishes to continue to engage with this ongoing process, to develop the Preliminary Environmental Information Report (PEIR) and inform the Environmental Statement that will form part of the application for the Development Consent Order (DCO) application for the M25 Junction 28 Improvements.

ECC has identified a range of issues and comments regarding the Scoping Report, which require further clarification, additional information and actions to be incorporated within the Environmental Statement. ECC's comments are outlined below.

Strategic Approach to HE engagement with ECC on Projects across Essex

ECC notes that there are a number of significant HE transport projects within and adjoining Essex, including Lower Thames Crossing (LTC), A12 improvements and A120 Braintree to A12. This provides a unique opportunity for ECC and HE, to discuss and explore a consistent and co-ordinated strategic approach to the development and implementation of these projects to provide a cumulative benefit for all parties. For example, the potential benefits for local employment and development of construction and engineering skills across the area.

ECC also welcomes the 'joined up' approach HE appear to have been taken with respect to the 'red lines' of the LTC and M25 Junction 28 schemes, which should ensure continuity between the schemes.

General Overview of the Scoping Report

The format for each environmental topic, as outlined in section 1.3 and Table 1.1 is of assistance and provides some clarity on the topics, emerging data, assessments and mitigation proposals to date. That said the omission of a dedicated "Transport" section summary or identification of where transport issues are embedded within the report should be addressed.

The Scoping Report rightly focuses on the immediate environmental issues, but the Examining Inspectors will surely wish to see forecast traffic figures upon which to assist their judgements. We understand that final figures are still in preparation but will be available for submission with the draft DCO. ECC therefore request the preparation of a full Transport Assessment as soon as this information does become available, the scope of which should be agreed with ECC as soon as possible.

ECC would have anticipated a dedicated transport section within this Scoping Report, as part of the overall Environmental information. The transport assessment should provide this information to enable both HE and ECC strategic networks to be planned holistically.

NSIP Procedural comment

It is noted that the Planning Inspectorate assigned projects to geographical areas to make them "easier to find", however this project covers two geographical areas on the PINS website. It is recommended that the project is listed with a weblink on the "East of England" page as well as the "South East", to assist with accessibility to the information.

ECC Comments by Service Area:

The nature and scope of the consultations responses that follow concern:

- Highways and Transportation
- Minerals and Waste Planning
- Lead Local Flood Authority – Flood and Water Management

- Public Health and Well-being
- Strategic Planning, Economic Growth, Regeneration and Skills
- Historic Environment and Archaeology
- Landscape; and
- Natural Environment

Highways and Transportation

The operation of the M25 junction 28 has a significant effect on the Essex road network, as a result of both peak period delays and in the event of an incident in the network. ECC would therefore welcome plans that will robustly ease congestion and provide capacity that would serve long term demand.

As indicated above ECC wishes to be fully engaged in the Transport Assessment to accompany this project and would anticipate this being a dedicated section within the PEIR. The issues for ECC are the impact on the Essex community and businesses, including all transport users, both directly and connectively to London but also the wider transport implications including changes in demand on strategic routes.

It is the expectation that a Transport Assessment will be supported by modelling and that that modelling will include appropriate forecast years. Modelling results will also support the assessment of the air quality and noise impacts of the scheme (Chapter 5 and 6).

It is recommended that modelling includes the neighbouring Transport and Highways Authorities. Any transport assessment should include the A12, A120, A127, A130, A13 and M11.

The Environmental Scoping Report does not refer to a transport assessment or transport modelling undertaken to inform the environmental assessment, including Noise and Air Quality Assessments. In view of the importance of the junction, such modelling would help to assure ECC that the proposals for the junction are robust and would provide the necessary capacity, service and resilience towards a reasonable planning horizon.

A Transport Assessment should also address road safety and accident management, including diversion routes to help understand the network impact in the event of accidents or other events affecting the junction and the adjacent M25 and M11.

All Chapters from 5 through 13, refer to the environmental considerations during construction but there are no indications that assessment of construction traffic has or will be undertaken.

Areas of interest will be:

- Impact of traffic management during construction to assess impact on the wider network;
- Programming of construction work and traffic management to assess the interaction with other construction on the wider network, be it the, A13 road widening, A127/A130 Fairglen Interchange improvements, the A127 route management strategy; M25 junction 28, A12 improvements and A120 Braintree to A12;
- Routes and programming of delivery and disposal of material and equipment to the site, to assess the potential impact on the Essex network;
- Understanding of employee access to the site, job numbers and expected modes of travel, including sustainable access; and
- Road safety during construction and management of events to minimise wider network impact

The strategic routes referred to above provide connectivity within Essex and connect Essex to London and the wider UK and are vital for connecting the economies of Essex and London. ECC needs to be satisfied that any impacts on the strategic routes connectivity, capacity and resilience are addressed and potential benefits for the Essex economy are optimised. ECC requires further data and analysis on the wider strategic routes to:

- Identify the impact on Essex and surrounding areas;
- Establish the projected increase in traffic arising from the scheme and the cumulative impact of current planned growth (and transport projects);
- Establish the implications, sensitivity and inter-relationship on transport movements across the wider strategic network;
- Understand the timescales for project delivery and the cumulative impacts and timing with other major transport infrastructure projects in the vicinity, be it the, Lower Thames Crossing, A13 road widening, A127/A130 Fairglen Interchange improvements, the A127 route management strategy; A130, M25 junction 28, A12 improvements (Brook Street to Margaretting Part of RIS 1) and A120 Braintree to A12;
- Understand the sustainable transport provision for employees and freight during both the construction and operational phases of the development. For example, how will employees travel to the site?;
- Understand the impact on traffic exiting southbound from Brentwood on the A1023 Brook Street, and existing traffic congestion at this junction; and
- Understand the implications of the scheme on the public Byway which crosses the southern end of A1023, runs south of Poplars and crosses M25 slip-road onwards to Putwell Bridge Farm and Oak Farm, to south of M25

Minerals & Waste Planning

ECC is the host Minerals and Waste Planning Authority in the two tier administrative area of Essex, and is the host authority in respect of the “Brentwood” element of the project.

The [Essex Minerals Local Plan - Adopted July 2014](#) concerns the administrative area of Essex only, and seeks to ensure a local supply of aggregates for the County.

The [Essex and Southend on Sea Waste Local Plan - Adopted October 2017](#) concerns the administrative area of Essex and Southend on Sea only.

Lead Local Flood Authority – Flood and Water Management

ECC is the Lead Local Flood Authority (LLFA) in the two tier administrative area of Essex, and is the host authority in respect of the “Brentwood” element of the project. This is incorrectly referenced in Paragraph 8.4.7, with Brentwood Borough Council being referenced as the LLFA.

Any surface water related issues within the boundary of Brentwood should be addressed to ECC who are the LLFA for this area. As such any development within this area should adhere to ECC’s [ECC Sustainable Drainage Systems \(SuDS\) Design Guide](#).

Table 8.1 should make reference to the [ECC Sustainable Drainage Systems \(SuDS\) Design Guide](#) as part of the list of local policy affecting the site.

ECC advises that under paragraph 8.4.18 consideration should also be given to surface water flood risk in the area. While the majority of surface water flood risk is linked to main river flooding, there are also standalone areas of surface water flood risk in this area which should be addressed as part of the development.

Within Table 8.3 the focus on water quality should not be limited to Water Framework Directive (WFD) targets but should also more generally try to remove pollutants entering into the water environment wherever possible through the use of surface water drainage features. Highways Agency Water Risk Assessment Tool (HAWRAT) uses less conservative assessments of the impact of pollutants, therefore ECC advises that preference should be given to measures highlighted in the CIRIA SuDS manual C753.

Similarly as above, the 2009 DMRB referred to in Paragraph 8.7.1 does not use the most up to date methods for the assessment of the water environment. Where possible reference should be made to the emerging document and local criteria for the assessment of the impact of surface water flood risk and pollution mitigation.

Under paragraph 8.9.1 please be advised that at this stage no consultation has taken place with ECC as the LLFA for the Brentwood area.

Public Health and Wellbeing

ECC is the Public Health advisor in the two tier administrative area of Essex, and is the host authority in respect of the “Brentwood” element of the project. ECC Public Health wish to engage with this process in liaison with colleagues in Public Health England and respective Local Authority Public Health advisors (including environmental health). The following comments are made.

- The wider determinants of health, with reference to any potential socio-economic benefits, should be explored in more depth i.e. employment opportunities.
- Issues of severance from this proposal on connectivity with walking and cycling needs to be examined in further depth.
- We would request that Environmental Health colleagues in impacted authorities and Public Health England are consulted so to ensure that the potential environmental impacts upon human health are raised with a specific reference to include Mental Health as part of this analysis.
- There appears to have been no engagement with Public Health as part of the consultation process in Section 13 “People and Communities” which needs to be addressed.
- The current proposals for the human health element of the Environmental Impact Assessment would benefit from Public Health input, advice and guidance.
- A more detailed overarching health element is required as either an extended, integrated EIA or a stand -alone health impact assessment.

Strategic Planning, Economic Growth, Regeneration and Skills

In paragraph 15.2.8 reference should be made to the Brentwood Enterprise Park proposed in Brentwood’s Draft Local Plan 2016, which is located at M25 Junction 29 to the north of the scheme study area. It should be noted that this strategic allocation is within both the permanent and temporary land requirements for the Lower Thames Crossing Scheme.

Reference should also be made to the Dunton Hills Garden Village allocation in the Brentwood Draft Local Plan 2016, which is a proposed major housing development along the A127 corridor to the south east of the scheme study area. Whilst it is not within the immediate vicinity of the study area, given the quantum of proposed development (2,500 new homes and at least 5ha of employment land) it should be considered as part of the cumulative impacts.

Historic Environment and Archaeology

With regards to the proposed study area set out in paragraph 11.2.1, ECC considers that 500m is a sufficient distance for Non-Designated Heritage Assets and Grade II listed buildings. It is recommended that a 250m additional buffer zone is also included to enable consideration of the impact of the proposal upon Grade I and II* listed heritage assets within the wider environs.

In addition to the guidance and policies listed in section 11.3, reference should also be made to *Historic England Good Practice Advice Note 3: The Setting of Heritage Assets (March 2015)*. The guidance is clear that contribution of setting to the significance of a heritage asset is not dependent on inter-visibility, and this has been clarified in a number of recent appeal decisions. Therefore it is erroneous to conclude, in paragraph 11.4.6, that there will be no requirement for further, detailed assessment of Listed Buildings in the next stages of the EIA process.

Whilst it is acknowledged that the scheme is to improve an existing junction that has already had a significant visual impact on the historic character of the area, ECC considers that the assumption in paragraph 11.4.22, that as a result there will be no additional adverse impacts, is inaccurate. Any harm caused will be cumulative, in addition to the harm already caused, rather than considered independent of it. ECC therefore recommends that the historic landscape should be scoped in, rather than excluded, in Table 11.3.

In addition to the two types of harm identified in paragraph 11.5.1, consideration should be given to secondary impacts upon heritage assets, such as the potential requirement for secondary/double glazing which may arise as a result of increased noise pollution, or the erection of new or taller boundary treatments to screen views.

ECC considers that it is important that the impact of increased heavy goods vehicles associated with construction is assessed, and access/transport arrangements altered if there is potential for direct harm. ECC therefore considers that the conclusion in paragraph 11.5.3 that *“the operation of the proposed route is not likely to result in permanent significant effects on designated heritage assets”* needs to be evidenced further.

In respect of section 11.9 ECC seeks assurances that identified stakeholders will not be consulted in isolation. Any future meetings regarding heritage should include representatives of all areas irrespective of local planning authority boundaries to ensure a consistent approach. It would be beneficial for Archaeology, Historic Buildings, and Landscape to be considered and consulted together given the interrelation of the disciplines.

It has previously been recommended that geophysical survey work be carried out as part of the assessment programme and its results included in the ES (paragraph 11.10.1), however ECC have past experience that geophysics is not always that successful on clay geology. ECC therefore recommends more extensive trial trenching than perhaps the geophysics results suggest may be needed. This will obviously depend on the survey results and design of the scheme.

Landscape

In respect of significant landscape impact, ECC advises that in addition to Alder Wood, the Grove and Lower Vicarage Wood, there are also a number of other Local Wildlife Sites (LoWS) and woodland areas in the local area that will be adversely affected, and combined could have the potential to affect the local landscape character.

ECC considers that it is important that viewpoints are identified at all significant landscape areas within the study area. It is recommended that this should include all LoWS, Ancient Woodlands and Registered Parks and Gardens.

Section 9.2 identifies a study area of 1.5km from the site boundary. ECC recommends that this is increased to 2km, at this early stage, in order to identify whether, as stated in paragraph 9.11.2, distant views from outside the 1.5km study area are *“unlikely to be discernible given the distances involved.”* By conducting baseline studies on a larger study area, any discernible areas can then be ruled out of future studies with evidence to support the decision.

ECC recommends that once the impact has been measured, and the resulting significance on the landscape character and key visual receptors has been assessed, mitigation measures should be sourced off site as well as through onsite landscape integration. For instance, offsetting mitigation at an external community landscape project/site could be funded.

ECC recommends that the Essex Landscape Character Assessment is taken into account, furthermore the assessments should take into account both the temporary and permanent implications of the proposal.

The Thames Chase Community Forest, which is located to the south of the A12 inside the M25 should be included in the considerations in Chapter 9 – Landscape and Visual, and the Thames Chase Trust should be consulted as part of this process.

ECC recommend that, given the wooded and hedged landscape surrounding the junction, that consideration should be given to the full visual envelope on all sides of the scheme in respect of visual intrusion. This should be in terms of the construction phase, but more importantly in terms of the operational phase of the scheme.

Natural Environment

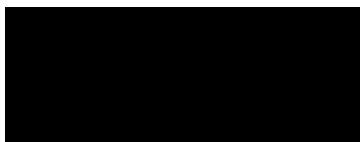
ECC considers the approach taken in Chapter 7 – Biodiversity to be fairly robust.

ECC welcomes the use of the approach set out in paragraph 7.10.1, of “No Net Loss and Net Gain of biodiversity”. ECC recommends that this should be based on the [‘Biodiversity Net Gain - Good practice principles for development’](#). The use of the Defra Metric to demonstrate loss and gain is also recommended. ECC seeks overall biodiversity enhancements as a result of the scheme.

Under paragraph 7.2.3, please note that Local Wildlife Sites are generally abbreviated to LoWS in Essex.

If you require further information or clarification on any points raised in this response please contact Gary McDonnell or Anne Clitheroe and their details are set out below.

Yours sincerely



Graham Thomas
Head of Planning Service
Economies, Localities and Public Health

Enquiries to: Gary Macdonnell
Project Manager Commissioning Delivery
Gary.Macdonnell@essex.gov.uk

Or
Anne Clitheroe
Principal Spatial Planner
anne.clitheroe@essex.gov.uk

Encs.

Enc – ECC response to HE M25 Junction 28 Improvements consultation November 2016 – January 2017

M25J28 Public Consultation

This is the formal response to the M25 Junction 28 improvement scheme consultation submitted on behalf of Essex County Council. This response has been developed following discussions with officers who have expertise in the areas of highways and transportation, strategic planning, economic growth and the environment, and has been formally agreed by Cllr Kevin Bentley; Deputy Leader and Cabinet Member with responsibility for and Economic Growth, Infrastructure and Partnerships.

Essex County Council is the Highways and Transportation Authority for the administrative county of Essex. Essex has a population of 1.4 million people and supports 766,000 jobs, it is home to over 73,500 businesses and generates over £30bn per year for the UK economy. The A12 transport corridor is key to the prosperity and vitality of Essex, connecting the rapidly growing urban centres of Chelmsford and Colchester with London and the Haven Ports; effective connectivity between the A12 and the M25 at Junction 28 is therefore essential to Essex.

The County Council supports the proposed Highways England congestion and safety improvements at M25 Junction 28. These improvements will enhance the connection between the M25 and A12, and together with the widening of the A12; will assist and enable the future development and economic growth of Essex.

The Council notes the information provided at the Public Consultation event summarising the existing conditions at the M25 Junction and the need for improvements to capacity in light of the existing and future predicted congestion. The need for these improvements was identified as part of the Road Investment Strategy (RIS).

All of the options meet the aims and objectives set by Highways England and are supported by ECC, however since Option 5f offers longer term network resilience this would be ECC's preferred option.

The long term network benefits will outweigh any short term construction inconvenience; however, we highlight the need for appropriate traffic management and minimal disruption during construction. Option 5B would potentially have the most impact on the A12 and M25 in terms of short term delay and disruption during the construction works. Options 5C and 5F in comparison could mainly be built offline, minimising the day to day impact and disruption to the A12 and J28.

ECC would like to ensure that whichever option is selected, the impact on traffic exiting southbound from Brentwood on the A1023 Brook Street is carefully considered. Whilst we appreciate that the improvements at Junction 28 are not aimed at delivering improvements at this location, we would like to ensure that the existing traffic congestion at this junction is not compromised as a result of the scheme. Therefore we request that the introduction of signals at this arm of the junction and their potential incorporation within the signal phasing for the M25 Junction 28 is considered as part of the detailed design for the scheme.

In addition to the above, consideration should also be given to the public Byway which crosses the southern end of the A1023, runs south of the Poplars and then crosses the M25 slip-road onwards to Putwell Bridge Farm and Oak Farm, to the south of the M25. This route forms part of ECC and BBC's ambition to improve and connect cycling / walking networks across Essex.

There will be a need for ECC and the HE to continue sharing traffic forecasting and modelling data in the area of the M25 Junction 28; and to work with Brentwood Borough Council to cater for the future growth proposed in the Brentwood urban area.

Please find below responses to sections B and C of the Public Consultation Questionnaire. Sections A, D and E have not been completed since they do not apply to ECC as an organisation.

We hope this response will assist in the further development of the project and look forward to working with Highways England as the scheme progresses.

ECC Questionnaire Responses

B1. Do you think there is a need to improve M25 junction 28?

Yes

B2. Which issues around the M25 junction 28 improvements are you most concerned about (Please tick all relevant)

	Very concerned	Concerned	No opinion	Little concern	No concern
Road safety		√			
Congestion		√			
Limited capacity	√				
Economic growth	√				
Noise		√			
Air quality		√			
Landscape		√			
Nature conservation		√			
Water environment and drainage		√			
People and communities		√			
Historic environment		√			
Impact of roadworks during construction	√				

C1. If you think the options will:

- Achieve any of the below, please put a tick in the box
- Not achieve any of the below, please put a cross in the box

	Encourage economic growth	Reduce congestion and delays	Improve the reliability of journey times	Improve road safety	Reduce noise and air quality issues
Option 5B		√	√	√	√
Option 5C		√	√	√	√
Option 5F	√	√	√	√	√

C2. Which option do you prefer?

Scheme option	Please tick one
Option 5B	
Option 5C	
Option 5F	√
No preference	

C3 Do you have any comments on any of the options?

Scheme option	Comments
Option 5B	Most impact and disruption during construction. Minimal radius could be a safety concern Most impact on local business. Least value BCR Limited long term resilience
Option 5C	Less impact and disruption during construction Less impact on local business High value BCR Limited long term resilience
Option 5F	Less impact and disruption during construction Less impact on local business High value BCR Long term resilience

C4 Please use the box below to share your views on anything else we should consider for junction 28 improvements.

ECC would like to ensure that whichever option is selected, the impact on traffic exiting southbound from Brentwood on the A1023 Brook Street is carefully considered. Whilst we appreciate that the improvements at Junction 28 are not aimed at delivering improvements at this location, we would like to ensure that the existing traffic congestion at this junction is not compromised as a result of the scheme. Therefore we request that the introduction of signals at this junction and their potential incorporation within the signal phasing for the M25 Junction 28 is considered as part of the detailed design for the scheme.

In addition to the above, consideration should also be given to the public Byway which crosses the southern end of the A1023, runs south of the Poplars and then crosses the M25 slip-road onwards to Putwell Bridge Farm and Oak Farm, to the south of the M25. This route forms part of ECC and BBC's ambition to improve and connect cycling / walking networks across Essex.

There will be a need for ECC and the HE to continue sharing traffic forecasting and modelling data in the area of the M25 Junction 28; and to work with Brentwood Borough Council to cater for the future growth proposed in the Brentwood urban area.

From: Marion.Davies@hse.gov.uk
To: [M25 Junction 28](#)
Subject: NSIP- M25 J28 Improvements- EIA Scoping Consultation
Date: 07 December 2017 17:16:45
Attachments: [NSIP - M25 J28 improvements HSE response.pdf](#)

Dear Gayle, Thank you for your letter of 14th November 2017. HSE does not comment on EIA Scoping Reports but the attached information is likely to be useful to the applicant.

Kind regards,

Marion.

Marion Davies
CEMHD5
Desk 57 2.2
Redgrave Court,
Merton Road,
Bootle L20 7HS
Telephone – 0203028 4374
e-mail; marion.davies@hse.gsi.gov.uk

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www.hse.gov.uk

CEMHD Policy - Land Use Planning
NSIP Consultations
Building 2.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: TR010029
Our ref: 4.2.1.6187
HSE email: NSIP.applications@hse.gov.uk

FAO Gail Boyle
The Planning Inspectorate
Bristol
BS1 6PN
By e-mail

07/12/17

Dear Ms Boyle

**PROPOSED M25 J28 Improvements (the project)
PROPOSAL BY Highways England (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11**

Thank you for your letter of 14th November 2017 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

The redline boundary of the development falls within the consultation zones of two major accident hazard pipelines:

HSE ref	operator	Pipeline ref	Pipeline name
8146	Cadent Gas Ltd	2405	Hordon / Abridge (2)
8191	National Grid PLC	2450	18 Feeder Stapleford Tawney / Tilbury Thames North

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.

Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

Waste

In respect of waste management the applicant should take account of and adhere to relevant health and safety requirements. Particular attention should be paid in respect of risks created from historical landfill sites. More details can be found on HSE's website at: <http://www.hse.gov.uk/waste/index.htm>

Electrical Safety

No comment from a planning perspective

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
2.2 Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS

Yours sincerely,
Marion Davies

PP
Dave Adams
(CEMHD4 Policy)

From: Single, Adam [mailto:Adam.Single@HistoricEngland.org.uk]
Sent: 28 November 2017 10:17
To: Gail Boyle
Cc: M25 Junction 28; richard.havis@essex.gov.uk; Brennan, Tim
Subject: RE: TR010029- M25 J28 Improvements- EIA Scoping Notification and Consultation

Dear Gayle

Thank you for the above consultation, I provide below comments on the Chapter 11 Cultural Heritage scoping, in my capacity as archaeology adviser for LB Havering. Archaeology comments on the Essex administrative area should be sought from Essex CC's archaeology advisers (copied in).

I have previously advised Atkins working on behalf of Highways England on the desirability and form of geophysical survey of the site and I recommend that this work be carried out as part of the assessment programme and its results included in the ES.

Consultation with GLAAS during data gathering will be necessary – recent fieldwork in Havering between the A12 and the Ingrebourne has identified a hitherto unexpected prehistoric site just south of the line of the Colchester Road. Other remains not yet on the GL HER include the structures from historic twentieth century aerodrome at Maylands, discovered in the Cotswold DBA.

More importantly, I disagree with an assumption in the scoping, namely that preservation by record of significant buried remains can be considered the only desirable mitigation of the scheme's impact in EIA terms. It is at best, an offsetting of the impact. The applicants should make provision for the preservation in situ of important remains, including design changes where appropriate, in order that important archaeological heritage is not destroyed.

Best wishes

Adam Single
Archaeology Adviser
Greater London Archaeology Advisory Service (GLAAS)

Direct Line: 0207 973 3748 Mobile: 07867 902 092

Historic England
4th Floor
Cannon Bridge House
25 Dowgate Hill
London EC4R 2YA

www.historicengland.org.uk

Please send all your planning and pre-planning archaeology consultations to: eglaas@english-heritage.org.uk



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Development Management

Civic Offices

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DX31807 Bexleyheath www.bexley.gov.uk*m/r* 17/02897/ALA*y/r* TRO10032-000007*Tel* 020 3045 5840*date* 28th November 2017*The person dealing with this matter is*

Helen Acton

(e-mail- Helen.Acton@bexley.gov.uk)

Highway England

C/o The Planning Inspectorate

Contact: Gail Boyle

3D Eagle Wing

Temple Quay House

2 The Square

Bristol BS1 6PN

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACTS**M25 Junction 28 (The Planning Inspectorate, Bristol) Kent****Scoping consultation and notification for the proposed application by Highways England (The Applicant) for an Order granting Development Consent for the junction improvements.**

I acknowledge receipt of your details received on 17th November 2017 requesting observations on the above proposal.

I would advise you that I am undertaking a consultation exercise regarding this proposal and I will endeavour to reply within the specified period. For your information the application was recorded in our records under reference 17/02897/ALA.

Please contact my assistant on the above telephone number if you have any queries.

Yours faithfully



Head of Development Management

Comments from London Borough of Havering on the Environmental Impact Assessment Scoping Report (Ref TR010029-000004)

Introduction

This response (below) sets out comments from the London Borough of Havering on the M25 Junction 28 Improvement Scheme Environmental Impact Assessment Scoping Report (PINS reference no. TR010029-000004).

The comments are provided on an 'officer' basis but will be referred to Members for their information.

Havering considers **that it is essential that all the matters raised below are addressed in the preparation of the final ES.**

Table of contents

It is noted within the table of contents that the Scoping Report does not include a specific section addressing the issue of traffic and transport. This is an important omission and **must** be rectified in the ES.

The comments follow the order of the content of the Scoping Report. If a section of the report is not identified then Havering has no comments on it.

Section 1 - Introduction

Section 1.1.2 refers to construction on the scheme beginning by March 2020. Officers are aware that in recent weeks Highways England has announced a "reprofiling" of delivery of a number of their projects contained within their Road Investment Programme including that of the M25 Junction 28 improvement scheme. This has resulted on the M25 Junction 28 improvement scheme not scheduled to commence construction until 2021/22.

The up to date position in terms of scheme delivery should be reflected in the ES.

Section 2 - The Project

Section 2.4.1 recognises that the scheme falls within the Green Belt and this is important because this should provide an important context for considering the visual impact of the proposals. National planning policy requires that a very careful and sensitive approach is taken to development in the Green Belt so as to protect and maintain its character and appearance. Havering strongly considers that this test is applicable to this scheme in Havering's Green Belt and all aspects of the scheme in Havering must be designed to minimise the adverse impact on its Green Belt.

Section 2.5 should fully explain how the proposed scheme will interact with the PBA pipeline that runs north – south across the scheme. Very few details appear to have been included within the Scoping Report about how this scheme will impact on this key piece of infrastructure.

Section 2.5.6 sets out the construction phase of the project, however there is little information contained within the Scoping Report regarding the potential impacts of the construction phase on the local area and on traffic. This must be considered and explained in the ES.

It is essential that the ES has a comprehensive suite of information and measures to deal with and mitigate the adverse impacts of construction within the site of the project and in the area beyond (including the highway network).

A Construction Code of Practice needs to be incorporated into the ES.

Section 3 - Alternatives

It should be recognised that Stakeholders were involved as part of the process for selecting a Preferred Route Announcement through consultation responses and involvement in evaluating route options.

Section 4 - Scope of Assessment

Section 4.1.4 sets out the list of topics that the scoping of the ES should consider.

Havering does not have any issue with the topics that have been set out but there must be a reference to traffic and transport. The ES must have an individual chapter specific on traffic and transport.

Section 4.1.6 sets out EIA directive new requirements on topics to be included in the EIA which includes monitoring which is welcome.

There is little information in the scoping report, however, as to how monitoring both during construction and post scheme implementation will be carried out in relation to the different topical areas such as noise, air quality etc. There should be a specific chapter on Monitoring within the ES setting this out.

Section 4.10.1 states that a Health Impact Assessment and an Equalities Impact Assessment will be produced, if required. Such assessment should be a requirement and the preparation of the final ES should take place alongside an Equalities Impact Assessment and a Health Impact Assessment and the findings of these should inform the ES.

Section 5 Air Quality

The report indicates that dust from construction traffic and pollution from operational traffic will be part of the full impact assessment (IA), for receptors within 200 metres. The report also indicates that construction noise and vibration and operational noise and vibration will be part of the full IA for the same receptors. Contaminated land will also be assessed in the full impact assessment.

At this stage Havering has no specific comments on those factors but must have the opportunity to influence the development of the IA.

The scoping report suggests that community liaison “should be considered” in relation construction noise. Havering considers it must be a requirement and makes the same comment about Section 61 consent.

Section 5.3.11 sets out local planning policy in relation to air quality. The ES must also take into consideration the targets Havering has contained within its Local Implementation Plan (LIP) for reducing levels of NO₂ and PM₁₀.

Section 5.3.15 – sets out Local Air Quality strategies. Havering does not currently have an Air Quality Action Plan (AQAP) but a draft AQAP is planned to go out to public consultation early in the new year and be formally adopted in the Spring of 2018. This must be taken into account in the ES.

Section 5.4.16 states that air quality monitoring through diffusion tubes is carried out at a number of locations close to the site. The ES should consider diffusion tube monitoring site locations TfL undertake along the A12 in Havering.

Section 5.5.3 explains the potential impact of construction dust on air quality. The intention to implement best practise mitigation measures is welcome. Consideration must be given to undertaking a Construction Dust Assessment (CDA) in order to assess the air quality impacts of dust during construction.

There is no reference to the potential impact of additional lighting during the construction phase or when the road is operational. Havering considers that this must also be assessed by an IA using current guidance and methodologies to reduce and minimise the adverse impacts.

There must be early involvement and consultation with Havering prior to the commencement of the air quality assessment to agree on the methodology which will be followed (e.g. modelling, model verification etc.).

Section 6 - Noise and Vibration

Havering supports the methodology proposed for the noise and vibration assessments as it includes all the relevant British standards and guidance required for such a project. It is also welcome that locations requiring potential noise mitigation will be reviewed to allow mitigation measures to be incorporated in the design of the scheme.

Havering must be involved in this process once such measures are identified in the ES.

Section 7 - Biodiversity

The ES must recognise that the Ingrebourne River and Weald Brook are rivers that flow through the scheme area.

The ES must also recognise that Ingrebourne River is listed as a Site of Metropolitan Importance to Nature. The ES should include details of what measures will be taken in terms of mitigating against habitat loss to the Ingrebourne River.

Section 10 - Geology and Soils

As is noted in the scoping report, the development area is in proximity to the Brook Street Landfill.

Section 10.4.16 states that this is an historical inert landfill site which is correct. This site received waste relating to the M25 construction and the last input of waste was on 01/08/1983. Havering has reviewed its own records, and on site investigation appears to have been undertaken at the site and surroundings.

Section 11 - Cultural Heritage

The ES must reflect that Place Services (linked to Essex County Council) provide advice on heritage matters to Havering as well as the other stakeholders identified in para. 7.3.4.

Place Services have been engaged to review the Scoping Report for Havering and their comments are set out below (as they were provided to the Council).

A primary requirement is the assurance that identified stakeholders will not be consulted in isolation. Any future meetings regarding heritage must include representatives of all areas irrespective of local planning authority boundaries to ensure a consistent approach.

Archaeology, Historic Buildings and Landscape must be considered and consulted together given the interrelation of the disciplines (Ch11.9).

Havering is in the process of adopting new criteria for assessing Non-Designated Heritage Assets (NDHAs) for inclusion onto their Local Heritage List. As the Local Heritage List progresses, the Environment Statement (ES) should take into account any new additions adopted from now until the application is submitted. The London Borough of Havering will endeavour to update their Local Heritage List as soon as practically possible to ensure Highways England can conduct a thorough analysis of NDHAs.

The report (Ch11.11.1) notes that additional assets will be considered of low-negligible value. Each heritage asset forms part of the wider historic environment and harm to collective elements will need to be considered holistically.

With regards to the proposed study area (Ch11.2), 500m is considered a sufficient distance for Non-Designated Heritage Assets and Grade II listed buildings. Highways England may wish to include a 250m additional buffer zone to enable them to consider the impact of the proposed scheme upon Grade I and II* listed heritage assets within the wider environs.

In addition to the guidance and policies listed (Ch11.3), Highways England should also reference Historic England Good Practice Advice Note 3: *The Setting of Heritage Assets* (March 2015).

Whilst it is acknowledged that the scheme is to improve an existing junction that has already had a significant visual impact on the historic character of the area the assumption (Ch11.4.22) that as a result there will be no additional adverse impacts is inaccurate. Any harm caused will be cumulative in addition to the harm already caused rather than considered independent of it. The applicant should include this within the scoping rather than exclude (Table11.3).

In addition to the two types of harm identified, Highways England should consider secondary impacts upon heritage assets (Ch11.5.1) such as the potential requirement for secondary/double glazing which may arise as a result of increased noise pollution or the erection of new or taller boundary treatments to screen views. It is important that the impact of increased heavy goods vehicles associated with construction is assessed and access/transport arrangements altered if there is potential for direct harm (Ch11.5.3).

The conclusion that “the operation of the proposed route is not likely to result in permanent significant effects on designated heritage assets” needs to be evidenced further.

Whilst it is beneficial to have an open dialogue with stakeholders throughout the pre-application/application process, all material for review should be submitted with a minimum two-week consultation period to ensure meaningful discussions.

Section 12 – Materials and Waste

Preparation of the ES must include engagement with the East London Waste Authority as this body is responsible for the management of waste in east London including Havering.

Section 13 - People and Communities

As has already been mentioned, a health impact assessment must be undertaken (para. 13.2.13) to help inform the ES.

Section 15 - Assessment of Cumulative Effects

Section 15.3.2 states that the main source of data for the cumulative effects assessment will be the outcomes and information obtained from the individual environmental topic assessments. This emphasises the importance of having a dedicated chapter for traffic and transport as part of the ES.

Whilst section 15.3.3 states that the cumulative effects associated with noise, air quality and traffic are likely to increase due to the Havering Housing schemes, it needs to be recognised in the ES that sub regional growth needs to be factored into the equation (particularly in relation to air quality and traffic modelling) given that Junction 28 of the M25 is a strategic road.

When considering the impact of the scheme on air quality and traffic as part of the ES, Highways England must liaise with the GLA and TfL to obtain sub regional growth and traffic modelling data which provides information on the impact London Plan growth will have on traffic on strategic roads.

Section 17 - Proposed structure of the Environmental Statement

As stated earlier in this response the ES should have a dedicated section on Traffic and Transport and Monitoring.

Contact :

Daniel Douglas
Transport Planning Team Leader
Development Service
London Borough of Havering
Tel : 01708 433220 and daniel.douglas@havering.gov.uk
12/12/17

Sent electronically to:

M25Junction28@pins.gsi.gov.uk

Nick Dexter
DCO Liaison Officer
Land & Business Support

Nicholas.dexter@nationalgrid.com

Tel: +44 (0)7917 791925

www.nationalgrid.com

12th December 2017

Dear Sir / Madam,

Ref: TR010029- M25 J28 Improvements- EIA Scoping Notification and Consultation

I refer to your letter dated 14th November 2017 in relation to the above proposed application for a Development Consent Order for the proposed M25 J28 Improvements. Having reviewed the Scoping Report, I would like to make the following comments:

National Grid infrastructure within / in close proximity to the order boundary

Electricity Transmission

National Grid Electricity Transmission has a high voltage electricity overhead transmission line within or in close proximity to the proposed order limits. The overhead line forms an essential part of the electricity transmission network in England and Wales. The details of the overhead line are shown below:

- ZB (275kV) overhead line route

Gas Transmission

National Grid Gas has a high pressure gas transmission pipeline located within or in close proximity to the proposed order limits. The transmission pipeline forms an essential part of the gas transmission network in England, Wales and Scotland:

- Feeder Main 18 (Matching Green to Tilbury)

I enclose a plan showing the route of National Grid's overhead line and the gas transmission pipeline.

Electricity Infrastructure:

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004).

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above
- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Gas Infrastructure:

The following points should be taken into consideration:

- National Grid has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with National Grid prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid.
- National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid.
- Please be aware that written permission is required before any works commence within the National Grid easement strip.
- A National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22.
- A Deed of Consent is required for any crossing of the easement

Cables Crossing:

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A National Grid representative shall supervise any cable crossing of a pipeline.
- Clearance must be at least 600mm above or below the pipeline.
- Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline.
- A Deed of Consent is required for any cable crossing the easement.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and National Grid's specification for Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22.

- National Grid will also need to ensure that our pipelines access is maintained during and after construction.
- Our pipelines are normally buried to a depth cover of 1.1 metres however; actual depth and position must be confirmed on site by trial hole investigation under the supervision of a National Grid representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of National Grid High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a National Grid representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been confirmed on site under the supervision of a National Grid representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NG supervision and guidance.

To view the SSW22 Document, please use the link below:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW/safeworking.htm>

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, National Grid is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by National Grid. Further information relating to this can be obtained by contacting the email address below.

Where the promoter intends to acquire land, extinguish rights, or interfere with any of National Grid apparatus protective provisions will be required in a form acceptable to it to be included within the DCO.

National Grid requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

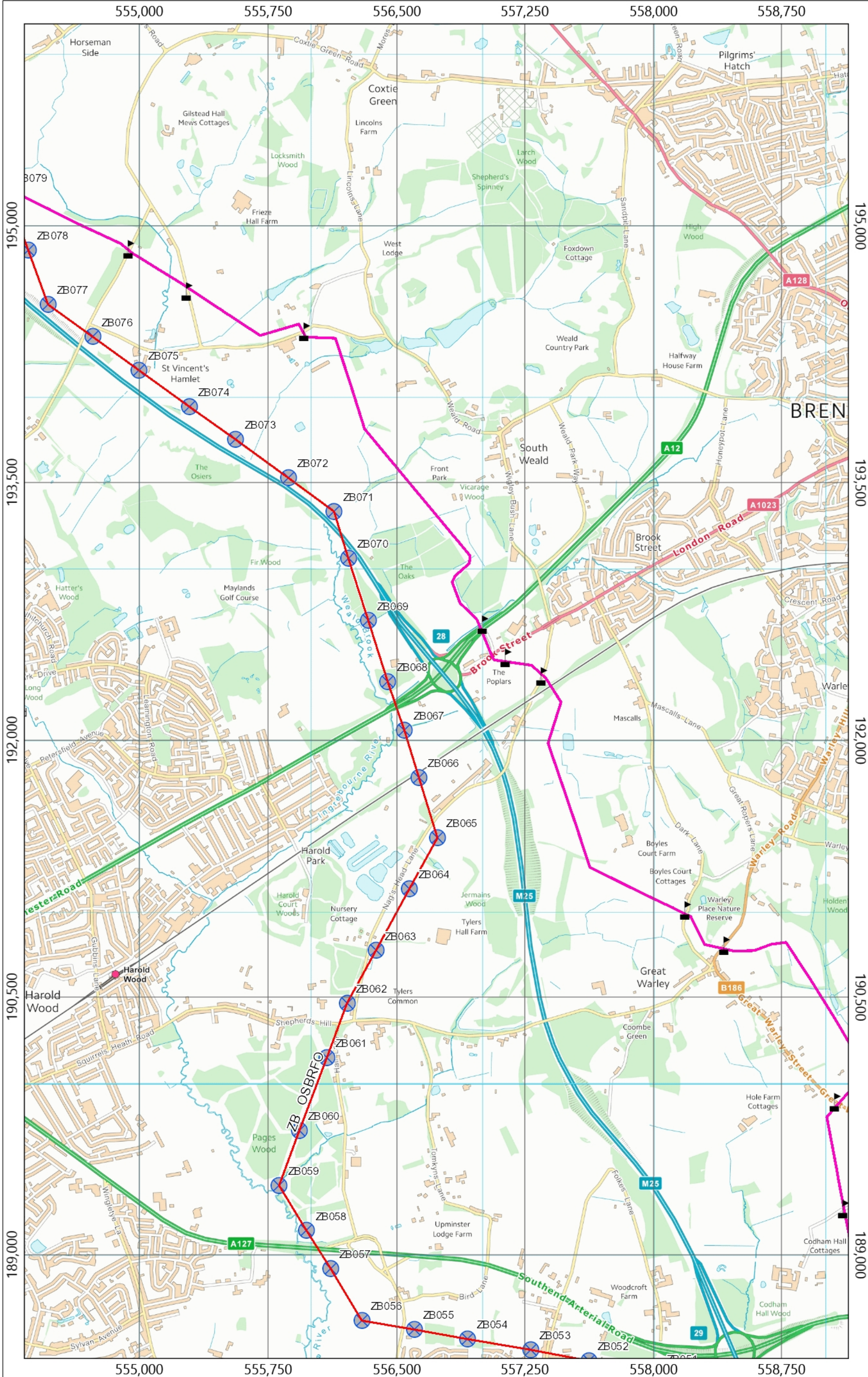
I hope the above information is useful. If you require any further information please do not hesitate to contact me.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity or gas customer services.

Yours Faithfully

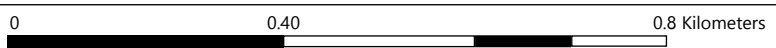


Nick Dexter.



- Legend:**
- Substations Commissioned
 - OHL 400kV Commissioned
 - OHL 275kV Commissioned
 - OHL 132kV & Below Commissioned
 - Towers Commissioned
 - Buried Cable Commissioned
 - Fibre Cable Commissioned
 - Pilot Cable
 - Oil Pipe
 - Cooling Pipe
 - Cooling Station
 - RAMM
 - Gas Operational Boundary
 - Gas Site Boundary
 - Block Valve
 - Compressor
 - LNG Site
 - Multijunction
 - Minimum Offtake
 - Future Minimum Offtake
 - Offtake
 - Pressure Reduction Installation
 - Pig Trap
 - Terminal
 - Transferred Offtake
 - Aerial Marker Post
 - Transformer Rectifier
 - Gas Pipe Feeder
 - Commissioned
 - Decommissioned Group
 - Planned and Spares

Notes:



Scale: 1: 21,987

Print by: **Dexter, Nicholas**

OS Disclaimer: Background Mapping information has been reproduced from the Ordnance Survey map by permission of Ordnance Survey on behalf of The controller of Her Majesty's Stationery Office. © Crown Copyright Ordnance Survey National Grid Electricity-100024241.NationalGrid Gas-100024886

Date: 11/12/2017
Time: 14:43:03

Page size: A3 Portrait

NG Disclaimer: National Grid UK Transmission. The asset position information represented on this map is the intellectual property of National Grid PLC (Warwick Technology Park, Warwick, CV346DA) and should not be used without prior authority of National Grid.

Note: Any sketches on the map are approximate and not captured to any particular level of precision.



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Ms Gail Boyle
Senior EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol, BS1 6PN

Your Ref : TR010029-000004

Our Ref : 41654

5th December 2017

Dear Ms Boyle

**Re: Scoping Consultation
Application for an Order Granting Development Consent for the proposed
M25 Junction 28 Improvements**

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Our response focuses on health protection issues relating to chemicals and radiation. Advice offered by PHE is impartial and independent.

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made the promoters should fully explain and justify their rationale in the submitted documentation.

The attached appendix outlines generic areas that should be addressed by all promoters when preparing ES for inclusion with an NSIP submission. We are happy to assist and discuss proposals further in the light of this advice.

Yours sincerely

Environmental Public Health Scientist
nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA¹. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES².

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

Receptors

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

¹ Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: <http://webarchive.nationalarchives.gov.uk/20100410180038/http://communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/>

² DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases
- should consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
 - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
 - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which

may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

Additional points specific to emissions to air

When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

Additional points specific to emissions to water

When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water

Land quality

We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the

migration of material off-site should be assessed³ and the potential impact on nearby receptors and control and mitigation measures should be outlined.

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the installation the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

Other aspects

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report⁴, jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible." PHE supports the inclusion of this information within EIAs as good practice.

³ Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

⁴ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

Electromagnetic fields (EMF)

This statement is intended to support planning proposals involving electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available in the following link:

<https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields>

There is a potential health impact associated with the electric and magnetic fields around substations, and power lines and cables. The field strength tends to reduce with distance from such equipment.

The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

Policy Measures for the Electricity Industry

The Department of Energy and Climate Change has published a voluntary code of practice which sets out key principles for complying with the ICNIRP guidelines:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect was published by one of PHE's predecessor organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:-

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP guidelines are implemented in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/Publichealth/Healthprotection/DH_4089500

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power frequency electric and magnetic fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m⁻¹ (kilovolts per metre) and 100 µT (microtesla). The reference level for magnetic fields changes to 200 µT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

SAGE was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:

<http://www.emfs.info/policy/sage/>

SAGE issued its First Interim Assessment in 2007, making several recommendations concerning high voltage power lines. Government supported the implantation of low cost options such as optimal phasing to reduce exposure; however it did not support the option of creating corridors around power lines on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available here:

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages (see first link above).

Annex 1

Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organisation can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach⁵ is used

⁵ Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24



M25 Junction 28 Improvement

Royal Mail Group Limited comments on information to be provided in applicant's Environmental Statement

Introduction

Reference the letter from PINS to Royal Mail dated 10 November 2017 requesting Royal Mail's comments on the information that should be provided in Highways England's Environmental Statement for the proposed M25 Junction 28 Improvement.

Royal Mail's consultants BNP Paribas Real Estate have reviewed the applicant's Scoping Report as submitted to the Secretary of State on 14 November 2017.

Royal Mail– relevant information

Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

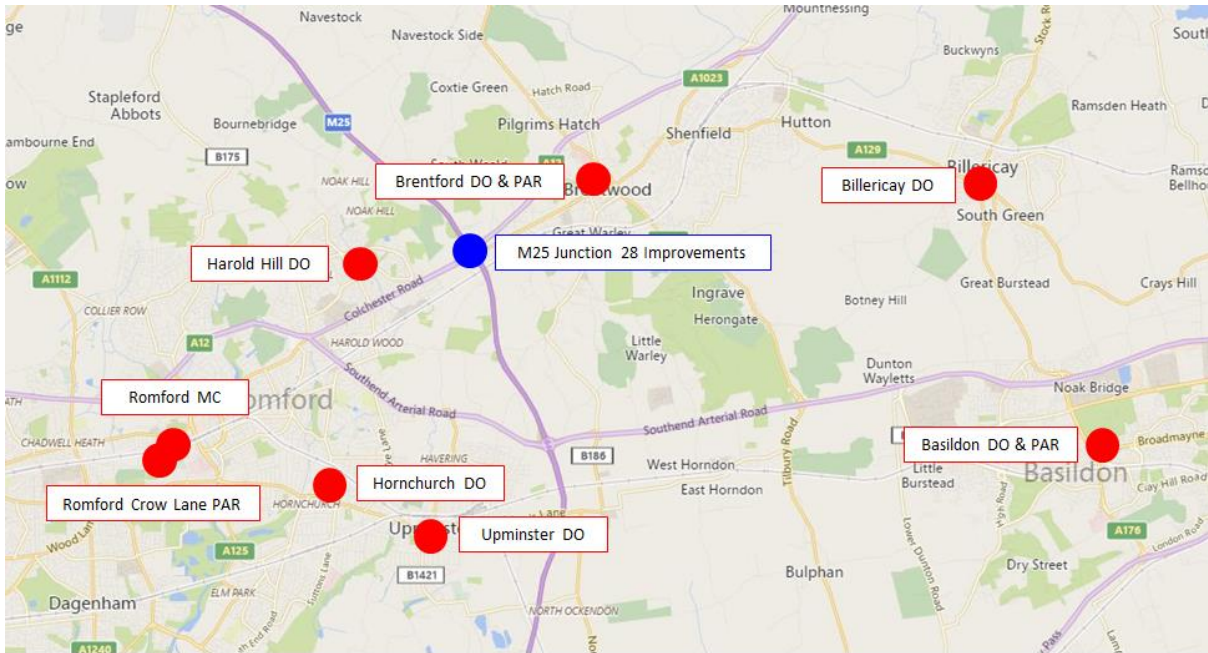
Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may potentially be adversely affected by the construction of this proposed road scheme.

Royal Mail's has ten operational properties within 12 miles of the proposed M25 Junction 28 improvement scheme as listed and shown on plan below:

Brentwood Vehicle Park	William Hunter Way, Brentwood CM14 4SS	1.6 miles
Brentwood Delivery Office	30 High Street, Brentwood CM14 4AA	1.8 miles
Harold Hill Delivery Office	Trowbridge Road, Romford RM3 8YN	2.6 miles
Hornchurch Delivery Office	154 Abbs Cross Gardens, Hornchurch RM12 4AZ	5.3 miles
Romford Mail Centre	Queen Elizabeth House, Romford RM7 0AB	5.8 miles
Romford Crow Lane Vehicle Park	Crow Lane, Romford RM7 0EP	6.0 miles
Upminster Delivery Office	58 Corbets Tey Road, Upminster RM14 2AS	6.3 miles
Billericay Delivery Office	135 High Street, Brentwood CM12 9AA	7.2 miles
Basildon Vehicle Park	Great Oaks, Basildon SS14 1AH	11.4 miles
Basildon Delivery Office	25 East Square, Basildon SS14 1AA	11.8 miles



The M25 and A12 are both strategically important distribution routes for Royal Mail operational traffic. Also, in exercising its statutory duties Royal Mail vehicles use on a daily basis all of the local roads that may potentially be affected by additional traffic arising from the construction of the proposed junction improvements.

It is envisaged that the proposed M25 Junction 28 improvements will, once constructed, reduce congestion which will have benefits for Royal Mail operational traffic movements. However, Royal Mail is concerned about the potential for disruption to its operations during the construction phase. In particular, Royal Mail requires more information and certainty about traffic management measures that will be put in place to mitigate construction impacts on traffic flows on the M25 and A12.

Royal Mail's comments on information that should be provided in Highways England's Environmental Statement

In view of the above, Royal Mail has the following comments / requests:

1. The ES should include information on the needs of major road users (such as Royal Mail) and acknowledge the requirement to ensure that major road users are not disrupted though full advance consultation by the applicant at the appropriate time in the DCO and development process.
2. The ES and DCO application should include detailed information on the construction traffic mitigation measures that are proposed to be implemented by Highways England / its contractor, including a draft Construction Traffic Management Plan (CTMP).
3. Royal Mail is fully pre-consulted by Highways England / its contractor on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The ES should acknowledge the need for this consultation with Royal Mail and other relevant major road users.

Royal Mail is able to supply Highways England with information on its road usage / trips if required.



Should PINS or Highways England have any queries in relation to the above then in the first instance please contact Joe Walsh (***joseph.walsh@royalmail.com***) of Royal Mail's Legal Services Team or Daniel Parry-Jones (***daniel.parry-jones@bnpparibas.com***) of BNP Paribas Real Estate.

From: Danielle Thomas [mailto:Danielle.Thomas@wwutilities.co.uk] **On Behalf Of** Dig
Sent: 17 November 2017 08:50
To: M25 Junction 28
Subject: RE: TR010029- M25 J28 Improvements- EIA Scoping Notification and Consultation

Good morning,

With regards to your below request, this is not Wales & West Utilities area. This falls within Cadent's area, contact details for them below:

Email: plantprotection@cadentgas.com

Telephone: 0800 688588

If you have any further questions please don't hesitate to contact me. Many thanks

Kind Regards,

Danielle Thomas
Plant Protection Team
Administrator Assistant

Telephone: **02920 278 912**

Email: Danielle.Thomas@wwutilities.co.uk

Wales & West Utilities Ltd | Wales & West House | Spooner Close | Celtic Springs | Newport | NP10 8FZ

