

Your ref: TR010029
Our ref: M25 J28/PINS/02

By email only
Mr Richard Allen
Lead Panel Member for the Examining Authority
National Infrastructure Planning

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20 July 2020

Dear Mr Allen

Planning Act 2008 – Section 89(3)
M25 junction 28 improvement scheme – application for a Development
Consent Order (DCO)

Thank you for your letter of 25 June 2020 and request for additional and updated evidence to support the above application. You strongly recommended that the requested evidence be submitted before the start of the Relevant Representations period. Please find below our response to the two queries you have raised.

1. Landscape and Visual Impact Assessment Resources

You suggested that photomontages would facilitate an effective examination. We agree and as indicated in section 3.6 of the **Environmental Statement (ES) Appendix 4.1: DMRB Sensitivity Test** (APP-050) photomontages were already being prepared for a limited number of suitable locations, with the intention that these would be provided prior to the commencement of the examination. Please find enclosed the following figures to supplement **ES Chapter 9: Landscape and visual figures** (APP-044) :

- Photomontage viewpoints location plan (figure 9.14)
- Photomontages viewpoint A (figures 9.15 - 9.18)
- Photomontages viewpoint B (figures 9.19 - 9.22)
- Photomontages viewpoint C (figures 9.23 - 9.26)
- Photomontages viewpoint D (figures 9.27 - 9.30)
- Photomontages viewpoint E (figures 9.31- 9.34)

We also enclose the methodology that we have used in the preparation of these photomontages and explain below the approach with reference in particular to the matters raised in your letter of 25 June 2020.

You outlined that the photomontages should be based on the existing agreed viewpoints but also show key structures and design features of the proposed Scheme, including but not limited to, major earthwork proposals (embankments) and the proposed realignment of the Ingrebourne River and Weald Brook.

Figure 9.7 (Viewpoint Location Plan) of **ES Chapter 9: Landscape and visual figures** (APP-044) sets out the visual receptors which are located within the study area, as well as those chosen as representative viewpoints to support the ES. The viewpoints used for the photomontages were chosen to complement the existing assessment presented in the Landscape and Visual Chapter of the ES and cover a variety of visual receptors (residential, recreational user, road user and Public Right of Way) and provide coverage of the Scheme within the context of the immediate surrounding landscape. In compiling the proposed photomontages, we have taken into account these viewpoints in line with the updated DMRB guidance (LA107)¹ and the Landscape Institute's Technical Guidance Note on the Visual Representation of Development Proposals². We have assessed the sensitive receptors surrounding the proposed Scheme (i.e. residential occupiers and recreational users) and the likelihood of those receptors experiencing adverse impacts. As outlined in the **Executive summary of ES Chapter 9: Landscape and visual** (APP-031), it is worth noting that due to the extent of the ancient and mature woodland blocks, vegetation and landform in the area, the visual impact of the Scheme is largely limited to the immediate area.

Accordingly, we have identified five locations for the preparation of photomontages and set out our rationale for each of these below.

Viewpoint A – A12, Putwell Bridge. This view was chosen as it demonstrates the likely view of the Scheme for road users travelling along the A12 as well as for the occupants of the adjacent Putwell Bridge caravan site. The photomontages demonstrate the changes to the viewpoint and the scale and design of the Scheme, in particular the realignment of the existing A12 eastbound off-slip including Maylands Bridge (Work No. 2) and the proposed new loop road including Grove Bridge (Work No. 6), along with associated signage, lighting and CCTV camera. The proposed realignment of a stretch of the Weald Brook (Work No. 23) and a stretch of the Ingrebourne River (Work No. 26D) would be in this area but would not be visible as these works would be below the existing road level and proposed bridges and road structures.

Viewpoint B – Grove Farmhouse. This location was chosen as it is the closest residential receptor to the Scheme. This view shows the alterations to the existing egress from Grove Farm (Work No. 15) and beyond it the realigned existing A12 eastbound off-slip with retaining walls (Work No.2) and lighting, earth re-profiling and the extent of the vegetation that will be removed and retained. The extension of the proposed Grove culvert is in this area but is not visible as it is hidden by the vegetation and proposed realigned A12 eastbound off-slip.

Viewpoint C – Maylands Golf Course, Existing Hole 2. This viewpoint was chosen as it is the closest location within the existing course to the proposed Scheme. This view shows the proposed new loop road including Duck Wood bridge and associated lighting and embankments (Work No. 6) along with the proposed tree screening. It also takes account of the proposal to relocate and reconfigure Hole 2 (Work No. 32).

Viewpoint D – Maylands Cottages. This receptor is located to the west of the proposed Scheme where a large proportion of the works are proposed to take place. This location was chosen as it is one of the closest residential properties (also assessed within the ES as visual receptor 9A) within the study area. This is an elevated view across the Weald Brook valley and demonstrates the Scheme within the context of the existing landscape and

¹ Design Manual for Roads and Bridges (LA 107 – Landscape and visual effects) (Revision 2 – Feb 2020)

² Landscape Institute Technical Guidance Note 06/19 (Visual Representation of Development Proposals) (17 September 2019)

current facilities located within the Grove Farm complex. This view helps to demonstrate the changes the Scheme will make and the areas of vegetation that will be retained as well as the proposed vegetation. This view shows the existing M25 in the background with proposed loop road (Work No. 6) and realigned existing A12 eastbound off-slip, including Maylands Bridge, (Work No. 2) along with lighting, gantry and embankments. It also indicates the changes to the area within which the deposit of surplus construction material (Work No 18) is proposed.

Viewpoint E - Bridleway south of Nags Head Lane. This is a long distance elevated view. This location was assessed in the ES as visual receptor 6B. It was selected as suitable for the preparation of a photomontage as it is one of the few Public Rights of Way within the study area that provides a view of the existing site and will show proposed elements of the Scheme. It is acknowledged that this represents a long distance view, however, the bridleway is sloping and as a result, the closer you move towards the Scheme the gradient lowers which then starts to obscure the view of the Scheme. This view shows the realigned A12 eastbound off-slip including Maylands Bridge (Work No. 2) and proposed new loop road including Duck Wood bridge (Work No. 6) with associated lighting and gantry.

The selected viewpoints as outlined above were chosen having regard to both sensitive receptors in the area and in order to illustrate the key structures and design components of the Scheme, in particular the proposed loop road (Work No. 6) and A12 eastbound off-slip (Work No. 2).

We have considered carefully whether it might be possible to illustrate, through the use of photomontages, the proposed changes to the Ingrebourne River and Weald Brook. However, these watercourses are not clearly visible from the public domain and are surrounded by vegetation. As a result, it is not possible to prepare photomontages to illustrate the proposed changes to these watercourses. However, information on the effects of the Scheme on these watercourses is provided within **ES Chapter 8: Road Drainage and the Water Environment** (APP-030) and the **Water Framework Directive Compliance Assessment Report** (APP-091). The realignment and mitigation proposals are also shown on Figure 2.2 of **ES Chapter 1-4: Introductory Chapters Figures** (APP-039).

We discussed our approach to the photomontages with officers from Brentwood Borough Council and Essex County Council (on 1 July 2020) and London Borough of Havering (on 3 July 2020) and the proposed viewpoints were agreed with each authority.

2. Work plans

You asked for clarification about which works would be undertaken on the parcels of land surrounding the environmental mitigation area between Maylands Golf Course and the M25 carriageway. As indicated on sheet 3 of the **Works plans** (APP-006) these areas do fall within the DCO boundary as they would be required on a temporary basis (plots 3/21, 3/16 and 3/18) with permanent rights also being required in some areas (plots 3/15, 3/17 and 3/19) as shown on sheet 3 of the **Land plans** (APP-005).

Temporary use of the aforementioned plots is required to facilitate the realignment of a stretch of the existing M25 northbound on-slip (Work No. 8), the provision of a new private means of access (Work No. 14), the deposit of surplus construction materials (Work No.17) and the construction of an ecological compensation area (Work No. 25) as described in Schedule 8 of the **draft DC0** (APP-015) and table A.1.3 of the **Statement of reasons** (APP-019).

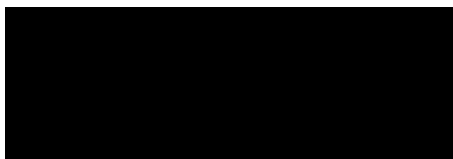
Permanent rights are also required in this area to enable access to be taken to the UKPN 11kV electric line (Work No. 30) and to enable the long term maintenance/monitoring of bird boxes to be installed as part of the Scheme's mitigation package as specified in table A.1.2 of the **Statement of reasons** (APP-019).

For ease of reference the below table identifies each plot within the area in question and sets out for each the corresponding work number, purpose for which the land is required and acquisition type:

Plot No.	DCO Work Nos.	Purpose for which the land is required	Type of acquisition
3/15	30	To access and maintain the diversion underground of an existing overhead electric line and to access, monitor and maintain bird boxes.	Rights to be acquired permanently
3/16	8, 14 and 17	Construction working area for improvements to the M25 northbound carriageway, the realignment of the existing northbound on-slip, and a new private means of access and to facilitate the deposit of surplus construction materials.	Temporary
3/17	N/A	Installation, access and maintenance of bird boxes.	Rights to be acquired permanently
3/18	17	To facilitate the deposit of surplus construction materials	Temporary
3/19	30	To construct, access and maintain the diversion underground of an existing overhead electric line	Rights to be acquired permanently
3/21	17 and 25	To facilitate the deposit of surplus construction materials and establish an ecological mitigation area.	Temporary

We trust that the information provided within this letter and its enclosures addresses the matters you raised but please let us know if you require any further clarification.

Yours sincerely,



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Enc. Location plan for photomontages, photomontages and methodology