

M25 junction 28 improvement scheme
TR010029
9.9 Statement of Common Ground with
Brentwood Borough Council

Rule 8(1)(e)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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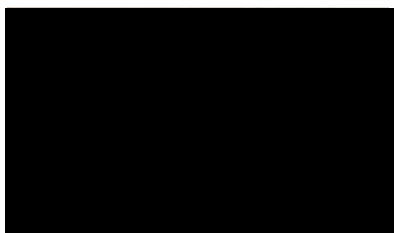
9.9 Statement of Common Ground with Brentwood Borough Council

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0	21 January 2021	Deadline 1


STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Brentwood Borough Council



Signed.....


Project Manager
on behalf of Highways England
Date: 21/01/21

Signed... 

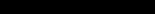

Corporate Director, Planning and Economy
on behalf of Brentwood Borough Council
Date: 13 January 2021

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1. Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (“SoCG”) has been prepared in respect of the proposed M25 junction 28 scheme (“the Application”) made by Highways England Company Limited (“Highways England”) to the Secretary of State (“Secretary of State”) for a Development Consent Order (“the Order”) under section 37 of the Planning Act 2008 (“PA 2008”).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify, and so focus on, specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Brentwood Borough Council.
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England.
- 1.2.3 Brentwood Borough Council is a host authority in respect of the application and as such is a local authority under section 56A of the Planning Act 2008.

1.3 Terminology

- 1.3.1 In the tables in the Issues section of this SoCG:
- “Agreed” indicates area(s) of agreement
 - “Under discussion” indicates area(s) of current disagreement where resolution remains possible, and where parties continue discussing the issue to determine whether they can reach agreement by the end of the examination
 - “Not Agreed” indicates a final position for area(s) of disagreement where the resolution of divergent positions will not be possible, and parties agree on this point.

- 1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to Brentwood Borough Council and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Brentwood Borough Council. However, if new issues arise, Brentwood Borough Council reserves the right to comment on those matters as it considers appropriate.

2. Record of engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and Brentwood Borough Council in relation to the Application is outlined in Table 2-1.

Table 2-1 Record of engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the issues tables)
Local authority liaison meetings		
11.04.17 and 12.04.17	Meeting	Workshop to obtain views and assess the extent to which the three Scheme options considered at the time would give effect to achieving the Scheme objectives and to agree actions to improve the value of the Scheme.
22.07.17	Meeting	Environmental stakeholder meeting with local authorities and statutory environmental bodies.
13.11.17	Meeting	DCO knowledge sharing event for host authorities to raise awareness of their role in the DCO process.
11.01.18	Meeting	Officer briefing meeting to discuss design work to date, programme, the scoping request for the environmental impact assessments and planned statutory consultation.
20.03.19	Meeting	Response to statutory consultation discussion.
11.04.19	Meeting	Project update - air quality noise and landscape.
15.04.19	Meeting	Monthly engagement meeting held jointly with London Borough of Havering.
29.05.19	Meeting	Monthly engagement meeting held jointly with London Borough of Havering.
24.06.19	Meeting	Non Motorised Users route workshop.
26.06.19	Meeting	Monthly engagement meeting held jointly with London Borough of Havering.
12.07.19	Meeting	Quarterly joint local authority forum on Scheme design and programme update.
20.08.19	Meeting	Monthly engagement meeting held jointly with London Borough of Havering.
20.09.19	Meeting	Monthly engagement meeting held jointly with London Borough of Havering.
29.10.19	Meeting	Statutory consultation feedback review meeting.
31.10.19	Meeting	Highways England gave Brentwood members a briefing on the Scheme, previous consultations, their outcome and the supplementary consultation.
01.11.19	Meeting	Quarterly joint Local Authority Forum (including representatives from Brentwood Borough Council, London Borough of Havering, Essex County Council and Transport for London) where Highways England gave a detailed briefing on the supplementary consultation.

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the issues tables)
28.11.19	Meeting	Monthly engagement meeting held jointly with London Borough of Havering.
13.12.19	Meeting	Traffic modelling meeting.
02.03.20	Meeting	Quarterly joint Local Authority Forum.
01.07.20	Meeting	Joint meeting with Essex County Council regarding proposed approach to photomontages.
28.07.20	Meeting	Update on application.
02.11.20	Meeting	Update meeting to discuss Relevant Representations and the SoCG.
Shared Documentation		
12.10.17	Email	Email from Highways England with draft Statement of Community Consultation (SoCC) for comment.
16.11.17	Email	Brentwood Borough Council response to consultation on Statement of Community Consultation (SoCC).
05.12.17	Email	Highways England emailed meeting availability in December 2017 to discuss design work to date, project programme, the scoping request for the environmental impact assessments, planned statutory consultation as well as the availability of town planning information.
08.12.17	Email	Highways England emailed to provide suggested locations of views to illustrate the potential visual impacts of the scheme during public consultation for comment / approval.
12.12.17	Email	Confirmation that Brentwood Borough Council have no comments to make on the junction 28 viewpoints proposed.
January 2018	Letter	Highways England confirmed that the January 2018 consultation was postponed allowing further development work on the design, taking into account all the key considerations.
05.10.18	Letter	Highways England sent consultation on Statement of Community Consultation (SoCC).
20.11.18	Email	Highways England emailed request for meeting / Member briefing prior to statutory consultation.
30.11.18	Letter	Highways England sent notification of statutory consultation as a prescribed consultee.
12.03.19	Email	Email from Brentwood Borough Council to request for review and comment on shortlist of sites to be considered for the Cumulative Effects Assessment under the Environmental Statement.
25.03.19	Email	Email from Brentwood Borough Council for Cumulative Effects shortlist reviewed, amendment requested to Honeypot Lane and Dunton Hills sites.
25.07.19	Email	Email from Highways England to request for comment on Transport Assessment scoping report
18.05.20	Email	Email and attached letter from Brentwood Borough Council with comments on various draft submission documents.

- 2.1.2 It is agreed that this is an accurate record of the key meetings and other forms of consultation and engagement undertaken between (1) Highways England and (2) Brentwood Borough Council in relation to the issues addressed in this SoCG.

3. Issues

3.1 Introduction and general matters

3.1.1 This chapter sets out the *'issues'* which are agreed, not agreed, or are under discussion between the Brentwood Borough Council and Highways England. On 12 November 2020, the Examining Authority issued a letter under Section 88 of the Planning Act 2008 and Rules 4, 6 and 9 of The Infrastructure Planning (Examination Procedure) Rules 2010 (known as the *'Rule 6 Letter'*). Annex D of the *'Rule 6 Letter'* sets out a request for Statements of Common Ground (SoCG) between Highways England and various parties, including Brentwood Borough Council. For the Brentwood Borough Council, the *'Rule 6 Letter'* advises that the following issues should be in the SoCG:

- Planning policy
- The need and principle of the proposed development and examination of alternatives
- Development in the Green Belt
- Biodiversity
- People and communities
- Flooding and water
- Historic environment
- Landscape and visual impacts
- Traffic and access
- Air quality
- Noise and vibration
- Cumulative impacts
- The Draft Development Consent Order

3.1.2 The *'Rule 6 Letter'* also advises that the SoCGs should cover where relevant:

- Methodology for environmental assessments including assessment of cumulative effects
- Data collection methods
- Baseline data
- Data/statistical analysis, approach to modelling and presentation of results
- Full expression of expert judgements and assumptions
- Identification and sensitivity of relevant features and quantification of potential impact
- Likely effects, including construction and operational effects

- Feasible and deliverable mitigation and method of securing such mitigation within the DCO.

3.1.3 Table 3-1 shows those matters which have been agreed or yet to be agreed by the parties, including a reference number for each matter, and the date and method by which it was agreed (if relevant). Given that there is only a small area under the remit of Brentwood Borough Council within the Order Limits, the discussion on some of these topics has been limited.

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
		fair assessment of compliance with relevant planning policies and transport plans.		
1.3 Development land				
1.3.1	APP-035	The sites allocated for development, or sites with extant permissions, were assessed and are as set out in Table 13.20 (Development Land) of the Environmental Statement (ES) Chapter 13 (APP-035). The assessment set out in sections 13.8.45 to 13.8.47 of the ES Chapter 13 (APP-035) that it is not expected that there will be any significant impacts on development land as a result of the Scheme. Overall, it is considered the Scheme would have a beneficial impact and support the delivery of development land.	Agreed	
2.0 THE NEED AND PRINCIPLE OF THE PROPOSED DEVELOPMENT AND EXAMINATION OF ALTERNATIVES				
2.1 Need for the Scheme and objectives				
2.1.1	APP-095	Brentwood Borough Council supports the principle of the Scheme and agrees that there is a need for the Scheme as set out in section 3.5 of the Case for the Scheme and Schedule of Accordance with National Policy Statement (CftS) (APP-095). Brentwood Borough Council along with other affected local authorities (ECC, LBH and TfL) were involved in developing the key objectives of the scheme and the Scheme meets the objectives	Agreed	

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
		as summarized in Table 3.1 of the CftS (APP-095), including relieving traffic congestion and improving safety.		
2.2 Alternatives				
2.2.1	APP-095 and APP-023	Highways England has considered a range of Scheme alternatives and consulted on them. The selection of the preferred Scheme is the most appropriate option for the reasons set out in section 2.4.3 of the CftS (APP-095) and was supported by Brentwood Borough Council in their response to the options consultations (Annex B, Consultation Report (APP-023).	Agreed	
3.0 DEVELOPMENT IN THE GREEN BELT				
3.1 Alternatives and justification				
3.1.1	APP-026	The Scheme, along with the existing motorway junction and M25, is located in Green Belt. This is unavoidable and there are no alternative options that would avoid works taking place within the Green Belt (see Chapter 3 of the ES APP-026 that sets out the alternatives considered).	Agreed	
3.1.2	APP-031	There are very limited physical works within the Brentwood Borough Council area. The green belt washes over this part of the borough. The Scheme has been designed to	Agreed	

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
		minimize visual impact on surrounding receptors and limit the impact on the openness of the Green Belt as set out within section 9.9 of Chapter 9 of the ES (APP-031).		
3.1.3	APP-095	In any event, the Scheme constitutes 'very special circumstances' and would not constitute inappropriate development as set out in section 5.5 of the Case for the Scheme (APP-095) and is therefore acceptable.	Agreed – Brentwood Borough Council consider that the proposal is 'local transport infrastructure which can demonstrate a requirement for a Green Belt location' and therefore under NPPF paragraph 146 (c) is not inappropriate. Therefore, it is not necessary to demonstrate very special circumstances to be acceptable in green belt terms, even if those circumstances exist.	

4.0 ENVIRONMENTAL IMPACT ASSESSMENT

4.1 Methodology of assessment, baseline and robustness of assessment

4.1.1	APP-027 to APP-037, APP-097	The methodology for the environmental assessment for each technical discipline (APP-027 to APP-037) is robust, is predicted on appropriate baseline information, addresses a suitable study area, recognises the likely significant environmental effects of the Scheme and identifies appropriate and suitable mitigation measures (summarised in each technical chapter of the ES (APP-027 to APP-037) and in the Register of	Agreed	
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SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
		Environmental Actions and Commitments (REAC) (APP-097).		
4.2 Cumulative impacts				
4.2.1	APP-037, APP-090, APP-091, APP-096 and APP-098.	The ES (Tables 15.7 – 15.10 of Chapter 15 (APP-037)), the Water Framework Directive Assessment Report (section 4.8 (APP-091)), the Flood Risk Assessment (section 2.8 (APP-090) and the Transport Assessment Report (Table 5-3 (APP-098)) appropriately assess the effects of the Scheme in combination with other planned and committed developments known at the time of the assessment as being likely to take place in the study area. Suitable provision is made to mitigate the identified significant effects (as outlined in paragraph 15.11.1 of ES Chapter 15 (APP-037) and in the REAC (APP-097).	Agreed	
4.3 Adequacy of environmental mitigation and compensation measures and proposed management and monitoring				
4.3.1	APP-097 and APP-072	The package of environmental mitigation and compensation measures for the Scheme outlined in the REAC (APP-097) (including the Outline Landscape and Ecological Management and Monitoring Plan (APP-072)) have been discussed with officers from Brentwood Borough Council and appropriately address the Scheme's likely significant effects.	Agreed	

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
5.0 BIODIVERSITY				
5.1.1	APP-097 and APP-015	<p>The Scheme has been designed as far as possible to avoid and minimize the impacts and effects on biodiversity features.</p> <p>The Scheme incorporates carefully considered mitigation measures set out in the REAC (APP-097) and secured by Requirements 4 and 5 of the draft Development Consent Order (APP-015).</p>	Agreed	
6.0 PEOPLE AND COMMUNITIES				
6.1 Effects on living condition of surrounding residents both from construction and operations activities				
6.1.1	APP-047 and APP-035	<p>Figure 13.1 of ES Chapter 13 (APP-047) identifies all the sensitive receptors within the administrative area of Brentwood Borough Council. ES Chapter 13 (APP-035) provides the assessment of the effects of the Scheme on human health and concludes that no significant effects on human health are expected.</p>	Agreed	
6.2 Effects on public rights of way/non-motorised user routes and other footpaths				
6.2.1		<p>The users of non-motorised routes within Brentwood Borough Council would still be able to use existing facilities.</p>	Agreed	

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
7.0 FLOODING AND WATER				
7.1.1		Brentwood Borough Council relies on Essex County Council for advice as the Lead Flood Authority and will look to the SoCG between Essex County Council and Highways England to cover any issues in relation to this matter.	Agreed	
8.0 HISTORIC ENVIRONMENT				
8.1.1	APP-047	During construction, there would be slight adverse effects predicted on 5 heritage assets and the operation of the Scheme would not result in any adverse effects (Table 11.5 of ES Chapter 11 (APP-033)). Two of these assets are archaeology priority areas/zones (DL033196 and DLO033238) which lie close to the boundary but fall within the London Borough of Havering's administrative area (Figure 11.2 in the ES APP-046). In any event, Brentwood Borough Council relies on Essex County Council for advice on archaeology and will look to the SoCG between Essex County Council and Highways England to cover any issues in relation to this matter.	Agreed	
9.0 LANDSCAPE AND VISUAL IMPACTS				

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
9.1.1	AS-001 to AS-008	Brentwood Borough Council was particularly keen to understand the visual impact of the Scheme and in July 2020 agreed with the approach taken to the photomontages submitted in support of the application (AS-001 to AS-008).	Agreed	
9.1.2	APP-031 and APP-039	The Scheme has been developed to limit as far as possible the impact on the surrounding landscape, including the provision of large areas of mitigation planting, as detailed in section 9.9 of Chapter 9 of the ES (APP-031) and shown on ES Figure 2.2 Preliminary environmental design (APP-039).	Agreed	
10.0 TRAFFIC AND ACCESS				
10.1 Traffic Modelling and Transport Assessment				
10.1.1	APP-098	<p>The methodology and scope of the traffic modelling carried out for the Scheme is robust and appropriate in respect of:</p> <ul style="list-style-type: none"> • Baseline monitoring (Chapter 3 of the Transport Assessment Report (TAR) (APP-098)) • Demand forecasting (section 5.3 of the TAR (APP-098)) • Future year modelling (Chapter 5 of the TAR (APP-098)). 	Agreed	

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
10.1.2	APP-098	The 2015 base flows used in the traffic modelling and reported in Chapter 3 of the TAR (APP-098) are robust and derived from reliable sources.	Agreed	
10.1.3	APP-098	The list of proposed developments contained in table 5.2 and shown on Figure 5.2 of the TAR (APP-098) correctly reflect the scale, type and location of planned growth within the modelled network area and are suitable for use in the traffic modelling/transport assessment.	Agreed	
10.1.4	APP-098	At present motorists experience congestion on Brook Street when travelling towards and through the M25 junction 28 during peak hours. In the future scenarios, further delays are expected as detailed in section 5.8 of the TAR (APP-098).	Agreed	
10.2 Impact on Strategic Road Networking (including Brook Street)				
10.2.1	APP-098	The Scheme is expected to have very little impact on the A1023 Brook Street at Nags Head Lane and Mascalls Lane junctions. If anything, a marginal reduction in delays on the Brook Street eastbound approaches to the junctions is expected. Notwithstanding this, Highways England are separately seeking to secure funding through their designated funds to optimize signal timings at Nags Head Lane and Mascalls Lane to provide some	Agreed	

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
		improvement in the operational performance of the junctions to reduce traffic delays on Brook Street, especially eastbound, above those with the Scheme.		
10.3 Impact on local road network / local communities				
10.3.1	APP-098	The Scheme will result in additional local benefits to due to less congestion on the junction 28 roundabout.	Agreed	
10.4 Displaced traffic during construction, including highways safety				
10.4.1	APP-096 and APP-015	The impact of the Scheme on traffic during the construction phase would be managed through the Traffic Management Plan that is secured in the dDCO through Requirement 10. The proposed traffic management of the Scheme during construction would ensure the free flow and safety of traffic.	Agreed	
11.0 AIR QUALITY				
11.1.1	APP-027	The methodology for carrying out the air quality modelling is robust and appropriate and is predicted on the most up-to-date data available at the time of carrying out the assessment (sections 5.4 to 5.7 of ES Chapter 5 (APP-027).	Agreed	
11.1.2	APP-027	The conclusion of the air quality assessment (outlined in section 5.10 of ES Chapter 5 (APP-027)) states that there would be no	Agreed	

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
		overall significant adverse air quality effect on receptors within Brentwood Borough Council during operation.		
12.0 NOISE AND VIBRATION				
12.1.1	APP-028	The methodology for the assessment of noise and vibration as set out in sections 6.4 to 6.7 of ES Chapter 6 (APP-028) is robust and appropriate.	Agreed	
12.1.2	APP-028	The noise and vibration assessment is robust and concludes that there would be no significant adverse effects or perceptible noise increases at sensitive receptors located in the Noise Important Areas within Brentwood Borough Council (section 6.14.3 of ES Chapter 6 (APP-028)).	Agreed	
13.0 DRAFT DOC (dDCO)				
13.1 dDCO articles and associated schedules				
13.1.1	APP-015	The dDCO was shared with Brentwood Borough Council and no comments were received. Accordingly, the articles and schedules in the dDCO are appropriate for the Scheme.	Agreed	
13.2 dDCO requirements				
13.2.1	APP-015	The dDCO was shared with Brentwood Borough Council and no comments were	Agreed	

SoCG reference number	Document reference	Relevant Issue	Position as regards agreement Highways England and Brentwood Borough Council and reasons for any different in views	Matters to be addressed/agreed
		received. The requirements set out in Part 1 of Schedule 2 of the dDCO are appropriate and provide an appropriate framework for securing the necessary and relevant environmental mitigation measures and other environmental control measures.		
13.2.2	APP-015	The procedures for discharging requirements as set out in Part 2 of Schedule 2 of the dDCO are appropriate and satisfactorily involve Brentwood Borough Council.	Agreed	
14.0 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN AND CONSTRUCTION IMPACTS				
14.1.1	APP-096, APP-097 and APP-015	The Outline CEMP (APP-096) provides a satisfactory framework that will ensure the acceptable environmental mitigation measures outlined in the REAC (APP-097) are identified and implemented. The CEMP and the measures within it will be secured by requirement 4 of the dDCO (APP-015).	Agreed	
15.0 PROPOSED SCHEME CHANGES				
15.1.1		The proposed changes to the Scheme which will be the subject of non-statutory targeted consultation in January 2021-February 2021 do no comprise any physical changes within the administrative area of Brentwood Borough Council.	Agreed	

3.1.5 The list below sets out the relevant examination documents used in Table 3-2.

Table 3-2 Examination documents

Reference	Title
APP-015	Draft Development Consent Order
APP-023	5.1 Consultation Report - Annex A - Scoping Request to the Inspectorate and Annex B - Options Consultation
APP-027	6.1 Environmental Statement – Chapter 5 – Air Quality
APP-028	6.1 Environmental Statement – Chapter 6 – Noise and Vibration
APP-031	6.1 Environmental Statement - Chapter 9 - Landscape and Visual
APP-035	6.1 Environmental Statement - Chapter 13 - People and Communities
APP-037	6.1 Environmental Statement - Chapter 15 - Assessment of Cumulative Effects
APP-039	6.2 Environmental Statement - Chapters 1-4 - Introductory Chapters Figures
APP-047	6.2 Environmental Statement - Chapter 13 - People and Communities Figures
APP-072	6.3 Environmental Statement - Appendix 7.16 - Outline Landscape and Ecological Management and Monitoring Plan
APP-090	6.6 Flood Risk Assessment
APP-091	6.7 Water Framework Directive Compliance Assessment Report
APP-095	7.1 Case for the Scheme and Schedule of Accordance with National Policy Statement
APP-096	7.2 Outline Construction Environmental Management Plan
APP-097	7.3 Register of Environmental Actions and Commitments
APP-098	7.4 Transport Assessment Report
AS-001 – AS-008	Photomontages
RR-005	Relevant Representation made by Brentwood Borough Council

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Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
Highways England Company Limited registered in England and Wales number 09346363