

# M25 junction 28 improvement scheme

TR010029

## 9.8 Statement of Common Ground with London Borough of Havering

Rule 8(1)(e)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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## Infrastructure Planning

### Planning Act 2008

### The Infrastructure Planning (Examination Procedure) Rules 2010

### M25 junction 28 scheme Development Consent Order 202[x ]

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#### 9.8 STATEMENT OF COMMON GROUND WITH LONDON BOROUGH OF HAVERING

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<b>Rule Number:</b>	Rule 8(1)(e)
<b>Planning Inspectorate Scheme Reference</b>	TR010029
<b>Application Document Reference</b>	TR010029/EXAM/9.8
<b>Author:</b>	M25 junction 28 scheme, Project Team, Highways England

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
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) London Borough of Havering

Signed.....

[Redacted Signature]

**Project Manager  
on behalf of Highways England  
Date: [DATE]**

[Redacted Signature]

Signed.....

[Redacted Signature]

**Team Leader Transport Planning  
on behalf of London Borough of Havering  
Date: 20/01/2021**

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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 application (“the Application”) for the M25 junction 28 scheme (“the Scheme”) submitted 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) London Borough of Havering.
- 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 London Borough of Havering is a host authority in respect of the application and as such is a local authority under section 56A of the Planning Act 2008.
- 1.2.4 This SoCG with the London Borough of Havering also covers heritage and archaeological related issues. A letter to the Examining Authority from Historic England dated 07 December 2020 notes that Historic England do not intend to enter into a SoCG with Highways England and that archaeological and heritage advice is provided through London Borough of Havering.

## 1.3 Terminology

- 1.3.1 In Table 3-1 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 section of this SoCG are not of material interest or relevance to London Borough of Havering 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 London Borough of Havering.

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## 2. Record of engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and London Borough of Havering 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
<b>Local authority liaison meetings</b>		
8 June 2016	Stakeholders Meeting	Greater London Archaeological Advisory Service (GLAAS) accepted invitation but were not subsequently contacted. Minutes were provided in 2017.
29 November 2016	Email consultation	Atkins set out an approach to baseline data gathering; air photo assessment, geophysical survey, possible trench evaluation near river, borehole information. GLAAS agree this.
29 March 2017	Email of WSI	GLAAS comments on WSI for geophysics work.
17 August 2017	Email of WSI	GLAAS further comments WSI for geophysics work prepared by AOC.
15 November 2017	EIA Scoping Notification	GLAAS provide scoping comments to PINS.
7 January 2018	GI locations monitoring proposals	GLAAS agree watching brief on GI locations and receive PEIR.
8 January 2019	AOC Desk based assessment	GLAAS receive DBA.
11 January 2019	Statutory Consultation	GLAAS comments sent.
22 July 2019	WSI for GI Watching brief by AOC	GLAAS agree second draft of WSI.
28 October 2019	Email	Problems with GI monitoring, attendance being missed, further investigative works agreed to compensate.
6 November 2019	WSI	Supplementary WSI (second draft) to cover above agreed.
27 February 2020	Supplementary Consultation	GLAAS comments provided to London Borough of Havering.
22 July 2020	Section 56 consultation	Documents received.
5 August 2020	Section 56 Consultation	GLAAS comments to London Borough of Havering.
18 November 2020	Email	Correspondence with Atkins of protocols for advice.
11 April	Meeting	Workshop to obtain views and assess the extent to

Date	Form of correspondence	Key topics discussed and key outcomes
2017 and 12 April 2017		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 July 2017	Meeting	Environmental stakeholder meeting with local authorities and statutory environmental bodies.
16 August 2017	Meeting	Preferred Route Announcement and the next stage of consultation.
13 November 2017	Meeting	A DCO knowledge sharing event for host authorities to raise awareness of their role in the DCO process.
11 January 2018	Meeting	Officer briefing meeting to discuss design work to date, programme, the scoping request for the environmental impact assessments and planned statutory consultation.
12 December 2018	Meeting	Member briefing on the Scheme.
20 March 2019	Meeting	Response to Statutory Consultation discussion.
11 April 2019	Meeting	Project update - air quality noise and landscape.
15 April 2019	Meeting	Monthly engagement meeting held jointly with Brentwood Borough Council.
29 May 2019	Meeting	Monthly engagement meeting held jointly with Brentwood Borough Council.
26 June 2019	Meeting	Monthly engagement meeting held jointly with Brentwood Borough Council.
12 July 2019	Meeting	Quarterly joint local authority forum.
15 August 2019	Meeting	Monthly engagement meeting held jointly with Brentwood Borough Council.
20 September 2019	Meeting	Monthly engagement meeting held jointly with Brentwood Borough Council.
28 October 2019	Meeting	Statutory consultation Feedback Review meeting.
01 November 2019	Meeting	Quarterly joint local authority forum.
28 November 2019	Meeting	Monthly engagement meeting held jointly with Brentwood Borough Council.
02 March 2020	Meeting	DCO joint Local Authority Forum – draft DCO documents.
03 July 2020	Meeting	Proposed approach to photomontages.
27 July 2020	Meeting	Update on application and SoCG.



Date	Form of correspondence	Key topics discussed and key outcomes
16 October 2020	Meeting	Update meeting on traffic modelling.
22 October 2020	Meeting	Update meeting to discuss the burial ground/Putwell Bridge caravan park.
28 October 2020	Meeting	Update meeting to discuss SoCG/cumulative impacts/Code of construction practice (CoCP).
<b>Shared documentation</b>		
06 January 2017	Letter	London Borough of Havering's response to non-statutory (option selection) consultation.
16 October 2017	Email	Highways England issued the draft Statement of Community Consultation (SoCC) for comment.
16 November 2017	Email	London Borough of Havering's response to consultation on (SoCC).
06 December 2017	Email	Highways England sought information relating to a former unlicensed landfill, located to the north-west of junction 28.
08 December 2017	Email	Highways England sought feedback on the provision of suggested locations of views to illustrate the potential visual impact of the scheme during public consultation for comment / approval.
2017	Letter	Highways England sent confirmation that the January 2018 consultation was postponed allowing further development work on the design, taking into account all the key considerations
10 January 2018	Email	Proposed agenda for meeting on 11.01.2018 was sent by Highways England.
30 November 2018	Letter	Highways England sent formal notification of statutory consultation as a prescribed consultee.
19 December 2018	Email	Highways England shared shape file of the proposed red line boundary.
12 March 2019	Email	Highways England asked London Borough of Havering to review and comment on shortlist of sites to be considered for the cumulative effects assessment under the Environmental Statement (ES).
18 March 2019	Email	Highways England sent an update on ground investigation works and relevant water consents.
10 April 2019	Email	London Borough of Havering confirmed that they had reviewed the cumulative effects shortlist and provided a list of further sites for possible inclusion.
17 April 2019	Conference call	Project update between London Borough of Havering and Highways England to discuss ongoing engagement.
26 July 2019	Email	Highways England sent the scoping report for the Transport Assessment was sent to the London

Date	Form of correspondence	Key topics discussed and key outcomes
		Borough of Havering for review.
30 August 2019	Email	The London Borough of Havering provided a response to Transport Assessment scoping report.
4 December 2020 and 30 December 2020	Emails	London Borough of Havering's response to Supplementary Consultation.
07 January 2020	Email	Confirmation from London Borough of Havering that <b>Section 23</b> (Prohibition on obstructions etc. in watercourses), <b>30</b> (Authorisation of drainage works in connection with a ditch) and <b>32</b> (Variation of awards) of the Land Drainage Consent can be included as part of DCO submission
17 April 2020	Email	Highways England shared the draft DCO documents (Draft DCO, Works plans, Land plans, Historic sites and features plans and Biodiversity plans, Register of environmental actions and commitments (REAC), Outline Landscape and Ecology Management and Monitoring Plan (LEMP), Outline Construction and Environmental Management Plan (CEMP) for review and comment.
29 May 2020	Email	List of relevant planning policy identified by London Borough of Havering was sent across to the team.
25 June 2020	Email	London Borough of Havering gave comments on the draft Outline LEMP and the REAC.
29 June 2020	Email	London Borough of Havering issued comments on the Biodiversity Site and Features Plan and the Historic Environment Sites and Features Plan.
08 July 2020	Email	London Borough of Havering issued comments on the Outline CEMP.
21 July 2020	Email	London Borough of Havering issued comments on the Draft DCO.
28 October 2020	Email	London Borough of Havering issued a consolidated table of comments on draft DCO documents (LEMP, REAC, Biodiversity Sites and Features Plan, Historic Environment Sites and Features Plan, Outline CEMP, draft DCO and planning policies).

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) London Borough of Havering in relation to the issues addressed in this SoCG.

## 3. Issues

### 3.1 Introduction and general matters

3.1.1 This section sets out the 'issues' which are agreed, not agreed, or are under discussion between the London Borough of Havering 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 SoCG between Highways England and various parties, including the London Borough of Havering. For the London Borough of Havering, 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 incorporates the matters noted above and 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).

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**Table 3-1 Table of issues and matters to be agreed – Version as at 21 January 2020**

3.1.4 Table 3-1 has been discussed with London Borough of Havering and this Interim Statement is version 1 at 21 January 2020

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
<b>1.0 PLANNING POLICY</b>				
<b>1.1 Statutory development plan</b>				
1.1.1.		<p>The relevant planning policies for the Scheme are set out in the National Policy Statement for National Networks (NPS NN) and the London Borough of Havering's Core Strategy and Development Control Policies Development Plan Document (2008) (which form the current statutory development plan).</p> <p>The London Borough of Havering's Local Plan Proposed Submission (August 2017) was submitted for examination on 27 March 2018. In October 2018 and May 2019 examination hearings took place. The Council recently published its main modifications for consultation (August 2020 to October 2020). The submitted Local Plan is likely to gain weight but may not be formally adopted before the finish of the DCO examination for the M25 junction 28 Scheme.</p>	<p>Matters under discussion - London Borough of Havering has concerns over a number of policies from a scheme compliance perspective which remain under discussion with the Highways England. These are set out below:</p> <ul style="list-style-type: none"> <li>• Local Plan Policy 22 Skills and Training</li> <li>• Local Plan Policy CP8 Community Needs</li> <li>• DC27 Provision of Community Facilities (Core Strategy and Development Control Policies 2008)</li> <li>• Policy CP9 Reducing the need to travel (Core Strategy and Development Control Policies)</li> <li>• Policy CP10 Reducing the need to travel (Core Strategy and Development Control Policies 2008)</li> <li>• Local Plan Policy 23 Connections Havering Local Implementation Plan (2019)</li> <li>• Policies CP 18 Heritage, DC 67 Buildings of Heritage Interest</li> </ul>	<p>Highways England is awaiting this information from London Borough of Havering and will continue to engage on these matters.</p>

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
			<ul style="list-style-type: none"> <li>Local Plan Policy 27 (Landscaping) Local Plan Policy 28 (Heritage assets)</li> <li>Policy DC 8 Gypsies and Travellers (Core Strategy and Development Control Policies 2008), Local Plan Policy 11 Gypsy and Traveller Accommodation.</li> <li>Policy 32 The Road Network (Core Strategy and Development Control Policies 2008)</li> <li>Policy 52 Air Quality (Core Strategy and Development Control Policies) and Local Plan Policy 33 Air Quality</li> <li>Policy DC 55 Noise (Core Strategy and Development Control Policies) and Local Plan Policy 34 Managing Pollution</li> <li>Policy DC 70 Archaeology and Ancient Monuments (Core Strategy and Development Control Policies).</li> </ul>	
<b>1.2 Accordance with planning policy</b>				
1.2.1	APP-098	Highway England's analysis contained in section 5 of the Case for the Scheme and the Schedule of Accordance with relevant policy tests in the NPS NN (APP-098) represents a fair assessment of compliance with relevant planning policies and transport planning policy.	Matters under discussion: - See comments on Local Development Framework and Local Plan policies highlighted in section 1.1 of this document.	
<b>1.3 Development land</b>				

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
1.3.1	APP-047	<p>The relevant sites allocated for development, or sites with extant permissions, were assessed and are as set out in Table 13.20 (Development Land) of Environmental Statement (ES) Chapter 13 (APP-047). The assessment set out in sections 13.8.45 to 13.8.47 of ES Chapter 13 (APP-047) is appropriate.</p> <p>It is not expected that there will be any significant impacts on development land as a result of the Scheme.</p> <p>Policy 36 of the Local Plan (August 2018) identifies that part of the site would be suitable for wind energy development. A modification has been proposed to that policy which intends to ensure that the delivery and operation of the Scheme would not be prejudiced.</p> <p>The Scheme would have a beneficial impact and support the delivery of development land.</p>	<p>Matter under discussion: - A number of Strategic development sites located outside of the Zone of Influence have not been considered as part of the assessment. In particular London Borough of Havering's proposed growth areas as set out in its emerging Local Plan.</p> <p>The emerging Local Plan includes a 15 year housing target over the Plan Period of 17,551 new homes to be delivered. Furthermore, Havering has a new Housing target set out in the draft London Plan to deliver 18,750 new homes over a ten year period which equates to a minimum of 1,875 units per annum.</p>	<p>Highways England will review the comments from London Borough of Havering regarding the inclusion of the strategic growth areas and will discuss further.</p>

## 2.0 THE NEED AND PRINCIPLE OF THE PROPOSED DEVELOPMENT AND EXAMINATION OF ALTERNATIVES

### 2.1 Need for the Scheme

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
2.1.1	APP-095	There is a need for the Scheme as set out in section 3.5 of the Case for the Scheme and Schedule (CftS) of Accordance with National Policy Statement (APP-095).	Agreed.	No further comment.
<b>2.2 Scheme objectives</b>				
2.2.1	APP-095	The Scheme meets the objectives as summarised in Table 3.1 of the CftS (APP-095), including relieving traffic congestion and improving safety.	Agreed.	No further comment.
<b>2.3 Alternatives</b>				
2.3.1	APP-095 and APP-023	Highways England has considered a range of scheme alternatives. London Borough of Havering supports the selection of the preferred Scheme as set out in section 2.4.3 of the CftS (APP-095).	Agreed.	No further comment.
<b>3.0 DEVELOPMENT IN THE GREEN BELT</b>				
<b>3.1 Alternatives and justification</b>				
3.1.1	APP026	The Scheme is located entirely within designated Green Belt. Therefore, any improvements to be made at M25 junction 28 will have to be located within the green belt if	Agreed.	No further comment.



SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
		they are to go ahead.		
3.1.2	APP-031	The Scheme minimises its visual impact on surrounding receptors and limits the impact on the openness of the Green Belt as set out within section 9.9 of Chapter 9 of the ES (APP-031).	Agreed.	No further comment.
3.1.3	APP-095	The Scheme constitutes 'very special circumstances' and would not constitute inappropriate development in the green belt as set out in section 5.5 of the CftS (APP-095). It is therefore acceptable in terms of its effect upon the green belt.	Agreed.	No further comment.
<b>4.0 ENVIRONMENTAL IMPACT ASSESSMENT</b>				
<b>4.1 Methodology of assessment, adequacy of surveys and baseline data and robustness of assessment</b>				
4.1.1	APP-026 to APP-037, APP-097, APP-050 APP-038	The methodology for the environmental assessment for each technical discipline is robust and is predicted on appropriate baseline information using appropriate data collection methods and addresses a suitable study area.	Matter under discussion: - Highways England has consulted London Borough of Havering on environmental matters during the preparation of the ES and the environmental mitigation proposed for the Scheme (APP- 039) have been developed in consultation with London Borough of Havering and other stakeholders.  London Borough of Havering is largely content with the appropriateness of the baseline data	Further discussions to take place between London Borough of Havering and Highways England on these matters.

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
			<p>used and the adequacy of the EIA outlined in the application, but the following matters are under discussion with Highways England:</p> <ul style="list-style-type: none"> <li>• People and Communities (APP-035) – specifically methodology used for Assessment of Non-Motorised Users contained within the People and Communities chapter of the Environment Statement. In particular the historic data that has been used which was from 2015.</li> <li>• Cultural Heritage (APP-033) – the level of archaeological investigation undertaken by the Scheme. Further discussions are required on this matter which are picked up in section 8.1.1 of this document.</li> <li>• Air Quality (APP-027) - London Borough of Havering supports in principle the air quality assessment methodology for the construction and operational impacts of the Scheme. However, they do not approve the following elements of the methodology:            While sensitive receptors within 200m of the site boundaries have been identified (Figure 5.2 of the ES), in line with the current guidance, a Construction Dust Assessment has not been undertaken, as such the risk of the construction dust impacts of the Scheme has not been</li> </ul>	

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
			<p>assessed. It is noted that this matter was raised in London Borough of Havering's Section 42 consultation response and was not addressed. Without an appropriate assessment, the Council has concerns that appropriate mitigation measures may not be taken, which will affect the health and well-being of its residents.</p> <p>Background concentrations have been derived from Defra's background maps (2015 reference year). Given that comparison of mapped and measured background concentrations in London Borough of Havering has shown underestimation of NO<sub>2</sub> of up to 42%, the Council considers that the use of unadjusted mapped background data is not appropriate. The Council considers that a representative NO<sub>2</sub> background concentration of the area would be in the range of 23-27µg/m<sup>3</sup>.</p> <p>Similarly, predicted background concentrations for the future year should be adjusted upwards. Taking into account that estimates of background concentrations is a parameter affecting the dispersion model's predicted results, the Council is of the view that the model should be reviewed to improve its performance, reduce uncertainties and</p>	

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
			<p>proceed to any necessary adjustments at a next stage.</p> <ul style="list-style-type: none"> <li>Assessment of Cumulative Impacts (APP-037) - London Borough of Havering remains concerned that the cumulative impact assessment does not appear to have taken into account Havering's housing trajectory. This issue was raised during the Section 42 consultation stage of the scheme development.</li> </ul> <p>London Borough of Havering has concerns regarding the approach that Highways England has taken to assess cumulative and in combination effects.</p> <p>The study area for the identification of 'other developments' for inclusion in the assessment of cumulative effects has been based upon thresholds and spatial areas. The Highways England states that "these thresholds and spatial areas are based upon professional judgement and taking into account the nature and location of the Scheme and the ZOIs for individual environmental topics."</p> <p>Only developments in the traffic model within 3 km of the DCO boundary have been included in the cumulative assessment.</p> <p>It is acknowledged in TR010029 6.1 ES Chapter 15 - Assessment of cumulative effects (APP-037) that Havering sent through a number of lists of proposed developments</p>	

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
			<p>which it considered should be taken into account in the development of the cumulative and in combination assessment.</p> <p>Havering's section 42 response noted growth areas outside of the Zone of Influence that Highways England should take into account including two Housing Zones in Romford and Rainham and Beam Park.</p> <p>It is noted that a Transport Assessment Supplementary Information Report (PDB-003) has been submitted by Highways England at Procedural Deadline B. Officers are currently reviewing this document to ascertain if this issue has been satisfactorily addressed.</p> <p>Matters Under Discussion - Traffic Modelling – Concerns similar to those identified in the Cumulative Impacts section with regards to development that has been taken into account with regards to Traffic Modelling.</p> <p>It is noted that a Transport Assessment Supplementary Information Report (PDB-003) has been submitted by Highways England at Procedural Deadline B. Officers are currently reviewing this document to ascertain if this issue has been satisfactorily addressed.</p>	
4.1.2	APP-050	The correct or up-to-date relevant policies and guidance have been used throughout the ES with the updated Design Manual for Roads	Agreed.	No further comments.

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
		and Bridges (DMRB) guidance being considered in Appendix 4.1 DMRB sensitivity test (APP-050).		
<b>4.2 Adequacy of environmental mitigation and compensation measures and proposed management and monitoring</b>				
4.2.1	APP-072, APP-039	The package of environmental mitigation and compensation measures for the Scheme (including the Outline LEMP (APP-072)) appropriately address the Scheme's likely significant effects.	Agreed.	No further comments.
<b>5.0 CUMULATIVE EFFECTS</b>				
<b>5.1 Cumulative and in-combination effects on, and with, other major projects and proposals</b>				
5.1.1	APP-037, APP-090, APP-091, APP-096, APP-098 and RR	Appropriate assessments have been undertaken to assess the potential cumulative and in-combination effects of the Scheme on, and with, other major projects and proposals.	Matter under discussion: - London Borough of Havering has raised concerns about the potential combined impact of the Scheme and Lower Thames Crossing.  Comments on cumulative impact assessment in particular in relation strategic growth outside of the study area have been raised as part of the Council Section 42 response and is references within the Local Impact Report.	Further discussion is taking place between Highways England and London Borough of Havering on this point.
<b>6.0 BIODIVERSITY</b>				
<b>6.1 Effects in Ingrebourne Valley Site of Metropolitan Importance</b>				

SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
6.1.1	APP-097, APP-029, APP-072 and APP-015.	The proposed environmental mitigation and compensation proposals to be carried out will provide suitable and adequate mitigation for the Scheme's effects on the Ingrebourne Valley Site of Metropolitan Importance. Requirement 5 of the draft DCO (APP-015) is appropriately drafted to ensure the implementation of the proposed mitigation.	Agreed.	No further comments.
<b>6.2 Effects on protected habitats and habitats of conservation concern including ancient woodland, other woodland, trees and hedgerows</b>				
6.2.1	APP-029, APP-097	The conclusions reached within the ES state that there would be no long-term residual effects for great crested newts, bats, breeding birds, otter and terrestrial invertebrates are accepted. There is an unavoidable loss of two veteran trees and the Highways England's proposal to replace their loss with 16 trees of suitable native species is appropriate mitigation for that loss.	Agreed.  Note: Highways England have provided London Borough of Havering with a draft copy of the Licence for Protected Species.	No further comments.
<b>7.0 PEOPLE AND COMMUNITIES</b>				
<b>7.1 Effects on the operation of Maylands Golf Course</b>				
7.1.1	APP-035	The proposed accommodation works (as outlined in section 13.10.21-13.10.22 of ES Chapter	Agreed.	No further comments.

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		13) would provide an equivalent area for hole 2 whilst minimising the impact on the Green Belt and Ingrebourne Valley Site of Metropolitan Importance.		
<b>7.2 Effects on Open Space</b>				
7.2.1	APP-035	Highways England has taken the cautious approach that considers the Gardens of Peace burial ground to be open space under the Planning Act 2008. It is accepted that diversion of the Cadent gas pipeline within the Gardens of Peace burial ground would not adversely affect the amenity of this site as open space, accounting for the necessary easement for the pipeline.	Agreed.	No further comments.
<b>7.3 Effects on public rights of way/non-motorised user routes and other footpaths</b>				
7.3.1	APP-047	There would be no worsening of existing non-motorised user facilities, and the new footpath along the re-aligned A12 off-slip would be wider than the existing facility.	Agreed.  London Borough of Havering notes that Highways England has been looking at options to improve cycling connectivity between the London Borough of Havering and Brentwood Borough Council via the Brook Street interchange and recognises that this falls outside the remit of the DCO. Highways England confirms that it is pursuing 'designated funds' for the improvements	Highways England to respond further in regard to NMU's.



SoCG reference number	Document reference	Relevant issue	Position as regards agreement Highways England and London Borough of Havering and reasons for any difference in views	Matters to be addressed/agreed
			<p>outlined which is outside the scope of this Scheme.</p> <p>Matter under discussion: - Whilst the new footpath on the A12 east bound off slip is welcome, the Council is concerned that there is currently inadequate provision for pedestrians and cyclists to safely navigate the Brook Street roundabout.</p>	
<b>7.4 Effects on living conditions of surrounding residents, both from construction and operational activities</b>				
7.4.1	APP-047, APP-035, APP-096 and APP-097	<p>Figure 13.1 of ES Chapter 13 (APP-047) identifies all the sensitive receptors within the administrative area of the London Borough of Havering which are pertinent to the Scheme. The methodology for identifying the relevant receptors is set out in section 13.5 of Chapter 13 of the ES (APP-035).</p> <p>The conclusions reached within Chapter 13 (APP-035) on the assessment of the effects of the Scheme on human health and that there are no significant effects are accepted.</p>	<p>Matters under discussion: – The London Borough of Havering has queried whether the occupiers of the Putwell Bridge Caravan Park can remain in occupation, and confirmation that their access will not be blocked off is required.</p> <p>Highways England confirms that discussions have been undertaken with Cadent and it is confirmed within the Statement of Common Ground between Highways England and Cadent Gas that there is no intention to block access to or from the Putwell Bridge Caravan Park site and that occupiers can remain in situ for the duration of the works to construct, operate and maintain the Scheme. The Council is seeking further written evidence that the residents of Putwell Bridge Caravan Park</p>	Further discussion is taking place between Highways England and London Borough of Havering on this point.

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			can remain on site during construction. Further written evidence is also required that access to the Caravan Park will remain in place at all times.	
<b>8.0 HISTORIC ENVIRONMENT</b>				
<b>8.1 Whether further archaeological investigation is required to understand potential significant deposits</b>				
8.1.1	APP-033, APP-097 and RR	<p>The proposed Archaeological Management and Mitigation Strategy (as set out in section 11.6.1 and 11.9 of ES Chapter 11 (APP-033) and Table 1.2 in the REAC (APP-097) is sufficient to cover the identification, evaluation and recording of significant archaeological material in advance of and during construction.</p> <p>Requirement 9 of the draft DCO (APP-015) is appropriately worded and will ensure that the relevant mitigation measures set out in the REAC are reflected in the written scheme of investigation.</p> <p>There are appropriate measures in place to ensure that further archaeological investigation takes place at the appropriate time before construction commences.</p>	<p>Agreed – The Desk-Based Assessment (DBA), while dated, reflects an accurate assessment of the historic environment baseline known at the time. The ES (APP-033) reflects an updated search of the Historic Environment Record and the maps and plans for the DCO application will be updated to reflect the latest baseline information, including the newly recorded Anglo-Saxon remains south of the site.</p> <p>Agreed – An Archaeological Management and Mitigation Strategy (AMMS) included in the Register of Environmental Actions and Commitments (REAC) and in the Outline Construction Environmental Management Plan (CEMP) as a condition of consent is appropriate to mitigate, manage and offset impacts to the historic environment and address the potential for unanticipated discoveries and outline provisions for the preservation of remains where this is appropriate, public outreach, community</p>	Highways England is in discussion with London Borough of Havering on the archaeological investigation matter.

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			<p>involvement, and public benefit.</p> <p>Agreed – While geophysical survey was initially agreed as part of the identification and evaluation of archaeological remains, circumstances have now indicated that such a survey would be impractical and of limited use. As such, geophysical survey is no longer required for assessment.</p> <p>Matter under discussion: – London Borough of Havering does not agree that there have been sufficient investigations to assess the presence and significance of as-yet unknown archaeological remains that may be impacted by the scheme. As such, London Borough of Havering does not agree that the application complies with the local and national policies that require the assessment of significance to be completed to inform the application for consent.</p>	
<b>8.2 Impact on the historic landscape and surrounding listed buildings</b>				
8.2.1	APP-033 and RR	All relevant designated and non-designated assets are identified and assessed in Chapter 11 of the ES (APP-033).	Under discussion: - The Grove Farm was identified by the DBA as being of possible historic date. Further assessments examined the Historic Environment Record, the Local List of Historically Important Buildings, and historic maps to identify any additional information regarding these buildings to try to determine their historic significance. No	Highways England is in discussions with London Borough of Havering about this matter.

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			<p>information was identified in the Historic Environment Record or the Supplementary Planning Documents for Havering on Heritage (which includes the local list of buildings of historic interest). A review of historic maps did not identify anything to add to the understanding of the buildings, nor did a search of the online archives lead to additional resources with which to assess the buildings. As no direct physical impact was identified, an internal survey of the structures was not considered necessary.</p> <p>In the assessment of impacts for the Scheme, impacts to the structures at Grove Farm would not physically impact the buildings, but would change the settings. The surroundings of these structures are no longer rural or agricultural, in part due to the development of the M25 and surrounding estates, but also due to the current and recent use of the land for metal recycling and skip-yard storage. As such, even if the structures were found to be historically significance due to their age, construction, or interior designs, the setting is unlikely to contribute to that significance. As such, the assessment did not identify any impacts to the heritage significance of the buildings at the Grove Farm. Highways England considers this to be a proportionate assessment in line with national and local planning policy.</p> <p>Regarding Tylers Hall Farmhouse and the timber framed range of outbuildings (NHLE</p>	

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			1079905 and 118938), they were not included in the impact tables of the APP-033 due to their distance from the scheme. When the study area was defined, the southern extent included a large stretch of the M25 where limited improvements were to be made, relating to the gantry replacement and signage. The assessment done for the ES and reflected in the impact tables did not include the buildings at Tylers Farmhouse for this reason. The text of the ES does note this but does not specifically identify that these were the buildings in question.	
<b>8.3 The effectiveness of mitigation measures</b>				
8.3.2	APP-097 and RR	The REAC (APP-097) sets out all the necessary mitigation measures committed for the Scheme as part of the ES.	London Borough of Havering is largely in agreement with the mitigation measures outlined in the REAC (APP-097). The matters under discussion – London Borough of Havering has queried why mitigation in respect of AOC3 and AOC4 is not included. The submitted application includes the Archaeological Management and Mitigation Strategy (as discussed in section 11.6.1 and 11.9 (APP-033) and Table 1.2 in the REAC (APP-097).	Further discussion is taking place between Highways England, London Borough of Havering and Greater London Archaeology Advisory Services on this point.
<b>9.0 LANDSCAPE AND VISUAL IMPACTS</b>				
<b>9.1 Visual effects</b>				
9.1.1	APP-031, AS-002 to AS-008 and RR	The Scheme limits as far as practicable the impact on the	Agreed. The London Borough of Havering has queried	No further comments.

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		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).	the technical preparation of the submitted documents. Highways England confirms it has produced the submitted photomontages in line with the latest guidance (September 2019).	
<b>10.0 TRAFFIC AND ACCESS</b>				
<b>10.1 Traffic Modelling and Transport Assessment</b>				
10.1.1	APP-098	The methodology and scope of the traffic modelling carried out for the Scheme is robust and appropriate in respect of: 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)).	Matter under discussion: - London Borough of Havering seeking further reassurance with regards to the impact of the scheme from strategic sub regional growth which has not been taken into account as part of the Traffic Modelling.	Further discussion is taking place between Highways England and London Borough of Havering on this point.
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 and type and location of planed growth within the modelled network area and are	Matter under discussion: - see comments in 10.1.1.	

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		suitable for use in the traffic modelling/transport assessment.		
<b>10.2 Impact on Strategic Road Networking (including A12 eastbound slip road and at Gallows Corner)</b>				
10.2.1	APP-098 and RR	<p>There would be improvements in the capacity of the roundabout at junction 28, which in turn improves the future performance of the strategic network connecting the A12 and M25 as reported Chapter 5 of the TAR (APP-098).</p> <p>The Scheme is not expected to have a significant impact on the operational performance of Gallows Corner junction, as reported in section 4 of the Transport Assessment Supplementary Information Report (TASIR) (PDB-003) submitted at Procedural Deadline B (21 December 2020).</p>	<p>Matters under discussion: - Further clarity is required on the impact on Gallows Corner when sub regional growth is taken into account.</p> <p>The Council notes that a Transport Assessment Supplementary Information Report (TASIR) (PDB-003) has been submitted to ExA and officers are reviewing the content in respect to Gallows Corner.</p>	Further discussion between Highways England and London Borough Havering following review of TASIR is required.
<b>10.3 Impact on local road network / local communities (particularly in respect of Woodstock Avenue and for existing access from A12 slip road)</b>				
10.3.1	APP-098 and RR	The construction and operation of the Scheme will not give rise to significant adverse effects on the local road network as reported in Chapter 5 of the TAR (APP-098).	<p>Matter under discussion – The London Borough of Havering considers that Gallows Corner should be accounted for in the local traffic modelling. To address this representation Highways England are proposing to issue a TASIR on 21 December 2020 that will provide information on the traffic impacts of the Scheme on Gallows Corner.</p> <p>London Borough of Havering notes that a TASIR was submitted on 21<sup>st</sup> December 2020.</p>	Further discussion between Highways England and London Borough Havering following review of TASIR.

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			This is being reviewed by London Borough of Havering.	
<b>10.4 Displaced traffic during construction, including highways safety</b>				
10.4.1	APP-015 and RR	<p>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 and would involve consultation with London Borough of Havering as the relevant highway authority. The proposed traffic management of the Scheme during construction would ensure the safety of road users and minimise additional traffic congestion and delay as far as reasonably practicable.</p> <p>Furthermore, Highways England will inform the public of the temporary traffic management arrangements at the junction in advance of and during the construction works via variable message signs on the road network, online and through the media. This will allow drivers to re-time their journeys or find alternative routes to reduce traffic demand at the junction during the busiest periods and thus, minimise traffic congestion and delay during</p>	<p>Matter under discussion – The London Borough of Havering has concerns about the full closure of the A12 off-slip.</p> <p>Highways England anticipates that the temporary construction measures will typically consist of speed restrictions and narrow lanes, with only a few overnight road closures. Lane and road closures will, as far as practicable, be restricted to weekends and/or overnight with the number of occurrences kept to a minimum. There will, however, be some lane closures, but not road closures, that will be in place all day, every day for longer periods of up to a few months. The temporary traffic management arrangements to enable construction of the Scheme do not require full closure of the A12 eastbound off-slip to junction 28 except for a few overnight closures.</p>	Further discussion between Highways England and London Borough Havering following review of TASIR.



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		the construction works.		
<b>11.0 AIR QUALITY</b>				
<b>11.1 Effects on Air Quality Management Area including Gallows Corner</b>				
11.1.1	APP-027, APP-040 and RR	<p>The study area and methodology for carrying out the air quality modelling outlined in section 5.5 of Chapter 5 of the ES (APP-027) is robust and appropriate.</p> <p>The conclusions reached within Chapter 5 (APP-027) on the assessment of the effects of the Scheme on air quality that it is unlikely there would be a significant adverse effect on air quality are accepted.</p>	<p>Matter under discussion: – The London Borough of Havering consider that further information is required to consider the air quality impact on the local road network. Highways England has used the SATURN traffic assignment model to inform the extent of the Affected Road Network (Figure 5.1 of APP-040) and considers that the effect on air quality would be imperceptible on the A127 and at Gallows Corner.</p>	<p>Further discussion is taking place between Highways England and London Borough of Havering on this point.</p>
<b>12.0 NOISE AND VIBRATION</b>				
<b>12.1 Effects on Noise Important Areas</b>				
12.1.1	APP-028 and RR	<p>The methodology for the assessment of noise and vibration effects as set out in sections 6.4-6.7 of ES Chapter 6 (APP-028) is robust and appropriate.</p> <p>The assessment is correct in its conclusions, including that there would be no significant adverse effects or perceptible noise increases at sensitive receptors</p>	<p>The Noise Important Areas considered in Table 6.7 in ES Chapter 6 (APP-028) are appropriate for the Scheme.</p> <p>Matter under discussion: – The London Borough of Havering considers that further evidence is needed to demonstrate that the residents of Putwell Bridge and owners of Gardens of Peace Cemetery are not significantly affected by the Scheme. London</p>	<p>Further discussion is taking place between Highways England and London Borough of Havering on this point.</p>

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		located in Noise Important Areas (section 6.14.3 of ES Chapter 6 (APP-028)).	Borough of Havering requested further evidence to demonstrate that the noise assessment appropriately covers these two receptors, including the proposed mitigations measures.	
<b>13.0 DRAFT DOC (dDCO)</b>				
<b>13.1 dDCO articles and associated schedules</b>				
13.1.1	APP-015	The articles and schedules in the dDCO are appropriate for the Scheme.	Matter under discussion: – Concerns related to provisions set out within the DCO which will require further discussion on with Highways England.	Further discussion on clauses to take place with Highways England.
<b>13.2 dDCO requirements</b>				
13.2.1	APP-015 and RR	The requirements set out in Part 1 of Schedule 2 of the dDCO are appropriate and provide a suitable framework for securing the necessary and relevant environmental mitigation measures and other environmental control measures.	Matter under discussion – Concern with regards to Clause 13 making use of deemed consent. Part 1, Clause 4. - Havering strongly disagrees that the CEMP for SoS approval can be left to the construction stage; indeed, London Borough of Havering has noted in the supporting documentation that Highways England intend to delegate the development and submission of the CEMP to its civil engineering contractor. The London Borough of Havering see no requirement to remove temporary works, but this is covered by article 35(5) and article 36(6), which require the removal of all temporary works and restoration of the land to the reasonable satisfaction of the landowner.	Further discussion is taking place between Highways England and London Borough of Havering on this point.

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13.2.2	APP-015 and RR	<p>The procedures for discharging requirements as set out in Part 2 of Schedule 2 of the dDCO are appropriate and satisfactorily involve the London Borough of Havering.</p>	<p>Matter under discussion: – The London Borough of Havering has expressed concern about the consenting process for the DCO requirements and that they will only be consulted whilst not having authority to inspect the works. Highways England considered that the proposed method of discharging the Requirements within Part 2 of Schedule 2 of the draft DCO is a well precedented principle. Moreover, requirement 17 of the dDCO includes provision that the Secretary of State will have evidence of the consultation to inform their decision on the discharge of requirements.</p> <p>The approval of requirements is exclusively reserved for the SoS. Havering notes two issues with this.</p> <p>Firstly, whilst London Borough of Havering notes that ‘consultation’ by Highways England is proposed prior to the making of a submission for discharge, it is clear that the Highways England is at liberty to ignore the views of the statutorily responsible authorities and submit a requirement for discharge irrespective of the consultee views expressed. London Borough of Havering would therefore invite the ExA to add a requirement for all consultation responses to be supplied to the SoS for his information.</p> <p>Secondly, London Borough of Havering will require authority to inspect the works with regard to environmental matters within its</p>	<p>Further discussion is taking place between Highways England and London Borough of Havering on this point.</p>

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			remit.	
<b>13.3 PROTECTIVE PROVISIONS</b>				
13.3.1	APP-015	The provisions as set out in Part 4 of Schedule 9 of the draft DCO (APP-015) are appropriate as regards to the protection of ordinary watercourses.	Agreed.	No further comments.
13.3.2	APP-015	The draft DCO does not need to include protective provisions for the benefit of London Borough of Havering as local highway authority.	Agreed.	No further comments.
13.3.3		Draft DCO Part 2, 3, 4 and Part 5	<p>Matters under discussion:</p> <ul style="list-style-type: none"> <li>London Borough of Havering has comments on Parts 2, 3, 4, and 5 of the dDCO (APP-015). These will be set out in the Local Impact Report.</li> <li>London Borough of Havering strongly disagrees that the approval of the CEMP can be left to contractor to finalise and the SoS to approve post consent.</li> </ul>	Highways England will review these and discuss further with London Borough of Havering.
<b>14.0 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN AND CONSTRUCTION IMPACTS</b>				
14.1.1	APP-096, APP-097 and APP-015	The Outline CEMP (APP-096) provides a satisfactory framework that will ensure that acceptable environmental mitigation measures are identified and implemented.	Matter under discussion - London Borough of Havering is largely in agreement with the proposed mitigation measures outlined in the Outline CEMP (APP-096) and REAC (APP-097).	Further discussion is taking place between Highways England and London Borough of Havering on this point.

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		The CEMP and the measures within it will be secured by requirement 4 of the draft DCO (APP-015). The mitigation measures supporting the Outline CEMP are presented in the Register of Environmental Actions and Commitments (APP-097).		
<b>15.0 PROPOSED SCHEME CHANGES</b>				
15.1.1		Highways England is consulting the London Borough of Havering on the proposed scheme changes as notified to the Planning Inspectorate at Procedural Deadline A.	Matter under discussion – London Borough of Havering have been notified of the intention to consult on the changes and are a statutory consultee. Discussions are set to take place on the proposed changes and the impacts they may have for London Borough of Havering.	Further discussion is taking place between Highways England and London Borough of Havering on this point.
<b>16.0Section 106</b>				
16.1.1.		London Borough of Havering have indicated that the Local Impact Report addresses proposed Section 106 contributions and would like to discuss with HE the planning obligations to mitigate the impact on the Scheme on the borough through securing and agreement under Section 106 of Planning Act 2008.	Matter under discussion – Highways England and London Borough of Havering will be discussing this further.	

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-096	Case for the Scheme and Schedule of Accordance with National Policy Statement
APP-026	6.1 Environmental Statement – Chapter 1-4 – Introductory chapters
APP-027	6.1 Environmental Statement – Chapter 5 – Air quality
APP-028	6.1 Environmental Statement – Chapter 6 – Noise and vibration
APP-029	6.1 Environmental Statement - Chapter 7 - Biodiversity
APP-30	6.1 Environmental Statement – Chapter 8 Road drainage and the water environment
APP-031	6.1 Environmental Statement - Chapter 9 - Landscape and visual
APP-032	6.1 Environmental Statement – Chapter 10 Geology and soils
APP-033	6.1 Environmental Statement – Chapter 11 Cultural heritage
APP-034	6.1 Environmental Statement – Chapter 12 Material and waste
APP-035	6.1 Environmental Statement – Chapter 13 People and communities
APP-036	6.1 Environmental Statement – Chapter 14 Climate
APP-037	6.1 Environmental Statement – Chapter 15 Assessment of cumulative effects
APP-038	6.1 Environmental Statement - Chapter 16 - Summary
APP-047	6.2 Environmental Statement - Chapter 13 - People and Communities Figures
APP-050	6.3 Environmental Statement - Appendix 4.1 - DMRB Sensitivity Test
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-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
	Relevant Representation made by the London Borough of Havering
AS-002 to AS-008	Photomontages
PDB-003	Transport Assessment Supplementary Information Report

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