

ECC M25 J28 Consultation response FINAL.docx

January 2017

Options Consultation Response

## **M25J28 Public Consultation Response (14<sup>th</sup> November 2016 – 6<sup>th</sup> January 2017)**

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

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

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

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

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

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



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

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

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

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

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

## ECC Questionnaire Responses

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

Yes

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

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

C1. If you think the options will:

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

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

C2. Which option do you prefer?

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

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

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

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

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

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

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

# Essex County Council Response to M25 J28 EIA Scoping Consultation Notification-Final.pdf

December 2017

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

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

**Sent by email:** [M25Junction28@pins.gsi.gov.uk](mailto:M25Junction28@pins.gsi.gov.uk)

Dear Ms Gail Boyle,

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

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

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

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

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

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

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

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

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

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

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

## Strategic Approach to HE engagement with ECC on Projects across Essex

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

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

## General Overview of the Scoping Report

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

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

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

## NSIP Procedural comment

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

## ECC Comments by Service Area:

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

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



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

### Highways and Transportation

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

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

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

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

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

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

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

Areas of interest will be:

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

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

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

## Minerals & Waste Planning

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

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

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

## Lead Local Flood Authority – Flood and Water Management

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

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

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

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

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

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

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

## Public Health and Wellbeing

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

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

## Strategic Planning, Economic Growth, Regeneration and Skills

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

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

## Historic Environment and Archaeology

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

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

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

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

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

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

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

## Landscape

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

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

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

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

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

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

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

## Natural Environment

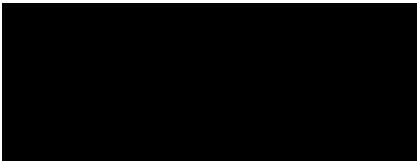
ECC considers the approach taken in Chapter 7 – Biodiversity to be fairly robust.

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

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

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

Yours sincerely



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

Enquiries to: Gary Macdonnell  
Project Manager Commissioning Delivery



Or  
Anne Clitheroe  
Principal Spatial Planner



Encs.

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

## Consultation Report Table 5.12.1

Statutory consultation response summary, section 42 consultees



**Table 5.12.1: Summary of responses from section 42 consultees**

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
Traffic implications	<p><b>LB Havering</b> expressed concern that the 2016 traffic modelling work was out of date. The Council requested updated traffic modelling work to take account of the current Scheme design. Also, the response stated that it was essential that the Scheme takes account of the Council's future growth and transport strategy and expressed concern about the cumulative impacts of multiple large scale infrastructure projects in the area.</p> <p><b>LB Havering</b> identified that it was also important for the Council to understand the impact of the Scheme on the wider highway network during construction and operation, particularly in respect of the A12 westwards to the Gallows Corner Junction and the approaches to the A12 on borough operated roads.</p>	<p>The traffic model was updated to include the latest Scheme design. Traffic data was obtained in November 2016 and used for the development of a junction 28 strategic traffic assignment model to complement the junction 28 microsimulation model.</p> <p><b>WebTAG unit M2.2 para 4.4.4 states</b> Practitioners should establish evidence on scale of changes to land use and demographic characteristics, transport networks, and travel patterns, with more attention given to the key movements in the model internal area, and use this evidence to assess the validity of 'old' data sources and their suitability for the intended use(s) of the model to judge their suitability for those specific use(s). Former guidance (withdrawn sections of the Design Manual for Roads and Bridges) indicated that models should not be used without</p>	<p>The TA report (application document TR010029/APP/7.4) submitted in support of the DCO application sets out the assumptions around modelling and takes account of future growth and development, depending on its certainty. The TA report also looks at journey times and considers the impact of the Scheme on the wider road network, both during construction and operation.</p> <p>Chapter 15 of the Environmental Statement (TR010029/APP/6.1) gives further details of the cumulative effects of this Scheme and other relevant developments.</p>

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
		<p>justification where the source data are more than five years old when used for detailed scheme appraisal because there might be significant changes to the travel patterns and traffic level. This simple threshold should not be used, as there can be significant changes that would make the use of more recent data inappropriate or there may have been little change and older data may be acceptable. Changes such as the closure or opening a major retail centre or opening or closure of major transport infrastructure such as a new bypass would be expected to result in the need to collect and use more recent data.</p> <p>An analysis has been carried out for the flows along the M25 based on 2019 data and this shows very little change in travel patterns, which does not warrant updating the base model.</p> <p>Further discussions have taken place with the host authorities on the approach and outcome of the</p>	



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
		<p>traffic modelling work and scope of the Transport Assessment.</p> <p>Following statutory consultation, a presentation was given to the host local authorities, including details of the traffic modelling as it currently exists and the outcome with the Scheme (see <b>Chapter 8</b> of this report). The host authorities were sent the scope of the TA on 26 July 2019 and were asked for their views on the contents. The LB Havering responded to this request on 30 August 2019 and their views have been taken into account in the preparation of the final document.</p>	
	<p><b>Brentwood BC</b> expressed support for the principle of the Scheme but considers that it does not fully resolve the issues the A1023 at this junction and expressed concern at the cumulative impacts. They acknowledged that the A1023 is not within the control of Highways England and further work with Essex CC is required to consider an appropriate solution. The Council</p>	<p>The implementation of the Scheme shows most movements seeing an improvement in travel time except the trips to / from Brook Street.</p> <p>As traffic moves more freely on the circulatory, traffic giving-way on the A1023 Brook Street (westbound) has to wait longer for a gap in the traffic to join the circulatory.</p>	<p>Further feasibility work has been undertaken in conjunction Brentwood BC to identify options to improve the situation, including an alteration to the signal timings at the M25 junction 28. These options will be further considered at the detailed design stage.</p>



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
	supported the revised proposals for A12 eastbound and the efforts to minimise disruption were welcomed and this approach was encouraged across the Scheme wherever possible.		
	<b>Essex CC</b> outlined that the Scheme potentially underestimates the level of future traffic levels and that there is a strong likelihood that traffic queues and delays from Brook Street would worsen substantially. This will need to be solved in the detailed design, ideally better than the Do Minimum scenario.	The implementation of the Scheme shows the majority of movements seeing an improvement in travel time except the trips to / from Brook Street. As traffic moves more freely on the circulatory, traffic giving-way on the A1023 Brook Street (westbound) has to wait longer for a gap in the traffic to join the circulatory.	Further feasibility work has been undertaken in conjunction with Essex CC to identify options to improve the situation, including an alteration to the signal timings at the M25 junction 28. These options will be further considered at the detailed design stage.'
	<b>Essex CC</b> requested further data regarding the impact on surrounding areas, including increase in traffic, interrelated transport movements and implications on public byways to the south.	Consultation was undertaken with the host authorities on the scope of the TA that has been submitted in support of the DCO application.	The TA (application document TR010029/APP/7.4) submitted in support of the application contains that information.
	<b>Essex CC</b> stated that further consideration should be given to the cumulative impacts of other projects and account should be taken of the Local	The cumulative impact of all committed development has been taken into account and the Applicant has liaised with the host	The Applicant has taken account of other plans and projects, depending on their certainty, in their assessments as set out in Chapter 15 of the ES (application document



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
	Plan allocations, including the Dunton Hills Garden Village.	authorities to obtain up-to-date information.	TR010029/APP/6.1) and TA (application TR010029/APP/7.4).
	<b>London Borough of Barking and Dagenham</b> stated that they were broadly supportive of any scheme that would help alleviate congestion and improve journey times on the A12. They are satisfied that the design/layout is sufficiently robust to address the various congestion and safety issues experienced at this location without significant environmental detriment. They welcome recent improvements to the A13/M25 interchange and highlight the need for further improvements to the A13 and provision of a tunnel at Castle Green.	Noted	N/A
	<b>Chelmsford City Council</b> expressed support for the Scheme and wishes to be involved in future consultations.	Noted	N/A
	<b>Doddinghurst Parish Council</b> support the Scheme but suggest other modifications that could be made that would be less complex (i.e. left turn slips from: A12 eastbound to A1023, A1023	Support noted. The Applicant is pursuing wider improvements in the area from Brentwood to Romford, including an investigation into potential improvements at the junction 28 Brook Street roundabout. These types of	N/A

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	to M25 south, M25 north to A12 west, M25 east to M25 north).	improvements would be funded and delivered separately from the Scheme.	
Existing infrastructure	<p><b>National Grid</b> (as prescribed consultee and PIL) stated that it has a high voltage electricity overhead transmission line and high-pressure gas transmission pipeline within or near the proposed order limits. It issued a 'holding objection' and detailed its key requirements in respect of this infrastructure, including requisite clearances, considerations during construction and easements.</p>	<p>The design has considered the overhead lines and the desirability of avoiding direct impacts on them. The A12 off slip road has been re-aligned northbound and the Ingrebourne watercourse realignment has been modified. The re-aligned off-slip was the subject of the supplementary consultation detailed in <b>Chapter 9</b> of this report and has been incorporated into the final design of the Scheme.</p> <p>Further minor design amendments were made as a result of engagement with National Grid, for example, the provision of a vehicle lay-by on the proposed loop road to provide vehicular access to National Grid operatives under a section of catenaries.</p> <p>The final design was sent to National Grid representatives and a face to face meeting was held.</p>	<p>National Grid specialists have confirmed by email that the design achieves the required 7.4 metre headroom from the lowest conductor.</p> <p>No impact on the National Grid high-pressure gas pipeline.</p>



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		<p>The final vertical profile of the road was provided to National Grid representatives in CAD format. It was agreed that the design achieves the minimum headroom requirement.</p>	
	<p><b>Cadent Gas</b> outlined that it has assets (high pressure (above 2 bar) gas pipeline, low or medium pressure gas pipes) and above ground installation in close proximity to the Scheme and set out its expectations if this infrastructure was either be retained or diverted.</p>	<p>The Applicant has undertaken further discussions with Cadent Gas, and it has been determined that the affected gas pipe needs to be diverted. There have been ongoing discussions with Cadent about this diversion (see <b>Chapter 8</b> of this report). The Scheme has been modified to accommodate the gas diversion, including the relocation of a drainage pond.</p> <p>A preferred option has been agreed based on environmental considerations, safety, constructability and impacts on landowners.</p>	<p>The Scheme now incorporates the gas pipeline diversion and powers for this are being sought as part of the DCO application, as indicated on the Works plans (application document TR010029/APP/2.3) and draft DCO (application document TR010029/APP/3.1).</p>
	<p><b>Health &amp; Safety Executive</b> identified two major accident hazard pipelines within the red line boundary and advised that they would like to be consulted regarding any changes to them. Also,</p>	<p>The Applicant is proposing to divert Cadent Gas's main pipeline, and this proposal was included as part of the supplementary consultation (<b>Chapter 9</b>).The</p>	<p><b>The DCO application is seeking the relevant powers for diversion of the Cadent gas pipeline and protection of the BPA asset.</b> Protective provisions are included in the draft DCO</p>



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	they highlighted that the Scheme may require Hazardous Substances Consent.	Health & Safety Executive were also a consultee for that consultation. The possible requirement for a Hazardous Substances Consent has been considered when reviewing the consents necessary to construct, operate and maintain the Scheme.	(application document TR010029/APP/3.1) for the protection of electricity, gas, water and sewage undertakers. The need for any potential Hazardous Substances Consent is noted and will be progressed separately to any powers being sought as part of the Scheme (see Consents and agreements position statement (application document TR010029/APP/3.3).
	<b>British Pipeline Agency (BPA) Limited</b> responded to advise that their pipeline and easement would need to be protected during construction and notice of works should be given in order to provide supervision over the line.	Noted. Discussions have taken place regarding protection of this existing infrastructure during construction (see <b>Chapter 8</b> of this report). The Applicant presented the proposed Scheme to BPA to seek feedback and understand BPA maintenance easement and protection requirements. Particular focus was given to the proposed layout of Duck Wood bridge and Grove bridge and it is agreed that the construction of these structures would have to be undertaken in close liaison with BPA.	BPA have indicated that they accept the design as currently proposed.



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	<b>Harlaxton Energy Networks Ltd</b> and <b>ESP Utilities Group Ltd</b> both confirmed that they had no assets in the area.	Noted	N/A
	<b>Peel Energy</b> notification of a change of contact details.	Noted	N/A
Impact on Maylands Golf Club	<b>Luddington Golf Limited</b> (who run Maylands Golf Club) commented that it would seem that the Scheme will turn Maylands Golf Club into a 17 hole course, which would make it become unsustainable as a Club for the local community and as a profitable business.	The Applicant has endeavoured to minimise the impact on Maylands Golf Course, including reducing the radii of the proposed loop road and using the construction method of pipe jacking to deliver the proposed diversion of the Cadent underground gas pipeline under the second tee. However, the diverted gas pipeline and its related easement would mean that in the future there is a risk that works in this area could cause disruption to the playability of the second tee of the golf course. The Applicant has worked to find a solution that would minimise any potential disruption and be proportionate to this latent risk. The proposed solution is to provide a replacement tee that resulted in the extension of the red line	The Applicant has made provision for land to be acquired to enable accommodation works to take place. This land is required to enable the relocation and reconfiguration of the second hole of the Golf Course to take place, shown on the Works plans (application document TR010029/APP/2.3) and Scheme layout plans (application document TR010029/APP/2.6). As such, the Scheme does not propose to turn the course into a 17 hole course.

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		boundary which was subject to a targeted consultation with Luddington Golf Limited (see <b>Chapter 10</b> for further details).	
<b>Environment</b>			
Water Environment	The <b>EA</b> outlined their expectations in terms of the WFD assessment.	<p>The Applicant shared the draft WFD compliance assessment report with the EA prior to its formal submission as part of the application and has taken their comments into account in the preparation of the final document.</p> <p>The Applicant has understood the EA's expectations and had discussions with them and explained them.</p> <p>A collaborative approach between the Applicant and the EA was established early in the design process to help inform the development of the Scheme.</p> <p>As well as addressing the consultation response, the approach undertaken by the Applicant is in line with the</p>	The WFD compliance assessment report has been developed in consultation with the EA as outlined in section 3 of the WFD compliance assessment report (application document TR010029/APP/6.7).



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	<p>The EA expressed its support for the setting back of abutments no less than eight metres from the watercourse, as well as the intention to reduce any impact of the Scheme on floodplain processes.</p>	<p>Planning Inspectorate's Advice Note Eighteen: The WFD.</p> <p>A first design iteration was presented to the EA at an early stage, which indicated two culverts being proposed over Weald Brook and the Ingrebourne River.</p> <p>Discussions with the EA prior to the statutory consultation resulted in the design of the bridges (Duck Wood bridge and Grove bridge) rather than two culverts to minimise the impact on the floodplain. A wide span is challenging to achieve because of the headroom constraints and the presence of the BPA pipeline, which restricts room for an intermediate pier to provide an ideal span and deck depth. Nevertheless, the design has been developed to include an 8 metre space between the river and bridge abutments.</p> <p>The proposed culvert extension is considered unavoidable due to the</p>	<p>Within the site constraints, the proposed structures have been set as wide and as high as possible, to mitigate their impact as indicated in the WFD compliance assessment report (application document TR010029/APP/6.7).</p> <p>The Applicant has worked closely with the EA to consider mitigation measures for the culvert extension, which are</p>

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	<p>However, they strongly opposed the extension of the culvert at the M25 over Weald Brook unless it would be justified, and all other feasible options have been explored.</p>	<p>constraints in the area influencing the alignment of the A12 off-slip, including the presence of National Grid's overhead transmission line. The proposed slip road has been positioned further northwards, where the overhead cables are higher, and more clearance can be provided.</p> <p>Following the responses to statutory consultation, the Applicant has held discussions, including a site visit to discuss mitigation proposals and understand the EA's expectation. Further details can be found in the WFD compliance assessment report (application document TR010029/APP/6.7).</p>	<p>detailed in the WFD compliance assessment report (application document TR010029/APP/6.7).</p>
	<p>The <b>EA</b> expressed support for the re-alignment of River Ingrebourne subject to flood modelling and commented that detailed fluvial flood modelling must be undertaken to inform the detailed design of the Scheme.</p> <p>The application site is partially within Flood Zone 2 and 3 and the Scheme</p>	<p>The Applicant has shared flood modelling with the EA prior to the formal submission and further details can be found in the FRA (application document TR010029/APP/6.6).</p> <p>The current design for the crossing over the Weald Brook and</p>	<p>The Applicant has submitted the modelling data for EA review and confirmed that the Scheme has been designed to a minimum 1 in 100 year.</p>



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	<p>design should be informed by an appropriate Flood Risk Assessment (FRA) (including being resilient to climate change). The EA would like to review the modelling and advised that the Scheme should be designed to a minimum one in 100 year.</p>	<p>Ingrebourne River delivers a 600 mm freeboard, in line with the EA flood risk management standards. At the eastern end of Grove bridge there is a section of bridge (approximately 20 metres) where the freeboard is no less than 300 millimetres. This was discussed and agreed with the EA.</p>	
	<p>The EA note that the main risks to water quality are to the watercourses both on and surrounding the site and advised that the WFD compliance assessment should demonstrate how the Scheme can address any impacts from the construction and operation to avoid further deterioration to the waterbody and how additional improvements to water quality can be made to ensure future resilience. Support was expressed for a Construction Environmental Management Plan and this would need to detail how potential water quality threats are to be protected and mitigated against.</p> <p>An assessment of the pollution risk associated with any infiltration drainage</p>	<p>The Applicant has shared the WFD compliance assessment report with the EA prior to the formal submission and further details can be found in the WFD compliance assessment report submitted in support of this application (application document TR010029/APP/6.7).</p> <p>The Applicant has shared the HAWRAT assessment with the EA and further details can be found in Chapter 8 of the ES (application document TR010029/APP/6.1).</p> <p>An Outline CEMP (application document TR010029/APP/7.2) has been prepared and addresses concerns raised by the EA.</p>	<p>The Applicant has shared the WFD and HAWRAT with the EA and considered their feedback in the finalisation of the documents.</p> <p>An Outline CEMP has been submitted in support of the application and sets out the proposed mitigation commitments in section 6 of the Register of Environmental Actions and Commitments (application document TR010029/APP/7.2 and TR010029/APP/7.3).</p>



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	scheme will be required and appropriate mitigation will need to be adopted and there will also need to be a management plan for any Sustainable Drainage Systems (SuDS) scheme to ensure the measures maintain their effectiveness for the lifespan of the Scheme in operation.		
	<b>Essex CC</b> commented that as the Scheme develops it should adhere to ECC SuDS Design Guide.	The design is in line with the Design Manual for Roads and Bridges (DMRB) <sup>11</sup> . The Applicant has reviewed the ECC SuDS Design Guide and has considered this guidance and all other guidance in the assessment (Road Drainage and the Water Environment chapter) Chapter 8 of the ES (application document TR010029/APP/6.1).	The design has incorporated a strategy that centres on the application of SuDS appropriate to the local conditions (see Drainage Strategy (application document TR010029/APP/6.8).
	The <b>EA</b> requested more information on any new outfalls into the Weald Brook or Ingrebourne river and these should be as small as possible and preferably not	Noted. Considerations have been made at the preliminary design stage and further details of the outfalls will be looked at in the detailed design stage.	To be considered at the detailed design stage.

<sup>11</sup> Please refer to ES Appendix 4.1 – DMRB Sensitivity test for further information regarding recent updates to DMRB guidance and how the EIA undertaken for the scheme has taken this into account.



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	<p>pre-cast concrete and should be set back away from the riverbank.</p> <p>The <b>EA</b> advised that a Flood Risk Activity Permit would be required for any works within eight metres of a main river and it would be useful to have a discussion on protective provisions.</p>	Noted.	The Consents and agreements position statement (application document TR010029/APP/3.3) sets out the Applicant's approach to additional consents to construct the Scheme.
Biodiversity	<p><b>Natural England</b> considered that the Scheme would not be likely to have an impact on European or nationally designated sites. Any impact on local sites should be mitigated and draw attention to their guidance particularly on protected species, landscape assessment and soil protection.</p> <p><b>LB Havering</b> welcomed the robust approach set out in the PEIR to survey and undertake an initial assessment of potential impacts of the Scheme on all relevant designated sites and protected and priority habitats and species. The Council expects the Scheme to be designed to achieve net gain for biodiversity and would like to be</p>	<p>Areas of mitigation are proposed in the DCO application following discussions with Natural England (see <b>Chapter 8</b> of this report) Consideration of Natural England's guidance formed part of the ecological impact of the Scheme and it is presented in Biodiversity chapter, Chapter 7 of the ES (application document TR010029/APP/6.1).</p> <p>As an NSIP, the Scheme is not required to achieve net gain for biodiversity, however the Applicant has developed an ecological compensation proposal in consultation with Natural England and local authorities. As part of the RIS programme, Highways England is committed to protecting</p>	<p>The mitigation required is set out in the Outline CEMP (application document TR010029/APP/7.2) and the REAC (application document TR010029/APP/7.3).</p> <p>The Biodiversity chapter (Chapter 7) the ES (application document TR010029/APP/6.1) outlines the mitigation required to reduce the impacts of the Scheme, the outline landscape and environmental design seeks to maximise ecologically appropriate habitats within the operational design.</p>



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	<p>involved in developing the proposed mitigation and discussions for any translocation of ancient woodland, soils and new woodland planting.</p> <p>Also, that it expects mitigation will need to be included in the Outline CEMP, including an EPS mitigation licence with compensatory requirements.</p> <p>The Council requires that the ecology chapter of the ES explores all reasonable options to enhance the development for biodiversity, including Protected and Priority Habitats and Species to support the Biodiversity Action Plan.</p>	<p>biodiversity and aims to reduce the loss of biodiversity by 2020, to deliver no net loss of biodiversity by 2025. This Scheme will be taken into account as part of this exercise.</p> <p>Discussions have been undertaken with the local authorities to develop mitigation proposals and these were the subject of the supplementary consultation undertaken in autumn 2019 (see <b>Chapter 9</b> of this report).</p> <p>The Outline LEMP (application document TR010029/APP/6.3) has been developed to specifically mitigate the effects on impacted biodiversity receptors rather than to meet any metric based targets. As well as design challenges and alterations to avoid sensitive impacts, the design includes creation and reinstatement of habitats that are appropriate to the impacts.</p>	<p>An Outline LEMP is also included in the ES (Appendix 7.16, application document TR010029/APP/6.3) which sets out the areas identified for long term management as compensation for habitat loss.</p> <p>The REAC (application document TR010029/APP/7.3) sets out all the mitigation measures proposed as part of the Scheme.</p>
	<p><b>Essex CC</b> highlighted that they considered there were opportunities to</p>	<p>Discussions about plans to enhance the site through</p>	<p>The Scheme incorporates an area for environmental mitigation. Full details are</p>



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	<p>protect and enhance biodiversity and geological interest and this should be developed in discussions with key stakeholders. They commented that negative impacts on Priority habitats and species must be justified as an IROPI in the ES.</p>	<p>creating/enhancing priority habitats and improving connectivity was undertaken and were included in the supplementary consultation (<b>Chapter 9</b> in this report). The Scheme would not negatively affect a Priority habitat or species and therefore an IROPI justification is not required.</p>	<p>provided within the Landscape and Ecological Management Plan submitted in support of the ES (application document TR010029/APP/6.3).</p>
	<p><b>Essex CC</b> considered that the project should aim for net gain biodiversity which would involve off-site compensation and monitoring.</p>	<p>With appropriate reinstatement and enhancement of habitats and management of habitats, the Scheme aims to mitigate and compensate for the loss of habitat during construction of the Scheme, as far as practicable. The Scheme includes reinstatement of habitats to replace those lost in temporary working areas and compensation for permanent loss of habitat within the Ingrebourne Valley SMI, including enhancement of habitats along the river corridor and in the Ecological Compensation Area. These enhancements have been the subject of ongoing discussions with ECC's ecologist.</p>	<p>Measures to avoid or mitigate for impacts on biodiversity resources during the construction phase are set out in the Outline CEMP (application document TR010029/APP/7.2) and further information on the maintenance of the landscape and ecological mitigation areas is available in Biodiversity chapter, Chapter 7 of the ES (application document TR010029/APP/6.1).</p>



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	<p><b>Essex CC</b> commented that the Outline CEMP and Outline LEMP must consider residual loss of habitat and compensation.</p>	<p>The Outline CEMP/REAC and Outline LEMP do refer to and consider residual loss of habitat and compensation.</p>	<p>The Outline LEMP is included within the ES (Appendix 7.16 application document TR010029/APP/6.3) and Outline CEMP is application document TR010029/APP/7.2 and the, REAC is application document TR010029/APP/7.3.</p>
	<p><b>Essex CC</b> expressed the opinion that further bat surveys, particularly for Nathusius Pipistrelle and surveys of veteran trees should be undertaken.</p>	<p>The Applicant has had discussions with Essex CC about bat surveys and agreed an approach. Since statutory consultation surveys have been undertaken to identify ancient and veteran trees.</p>	<p>Further bat survey work has been and will be undertaken.          Further tree survey work was undertaken and is reported in an Arboricultural Impact Assessment Report that forms part of the ES (application document TR010029/APP/6.3).</p>
	<p><b>Essex CC</b> commented that ecology and landscaping should be cross referenced with the lighting strategy in the Ecological Management Plan.</p>	<p>Noted.</p>	<p>The Outline LEMP is also included in the ES (Appendix 7.16, application document TR010029) and REAC (application document TR010029/APP/7.3) <del>also</del> sets out all the mitigation measures proposed as part of the Scheme and references the lighting strategy during construction and operation.</p>
	<p><b>Essex CC</b> suggested that the study area for SACs, SPAs, SSSIs and</p>	<p>The extent of the study area was considered and is determined by</p>	<p>The rational and extent of the study area is set out in Chapter 7 (Biodiversity) of</p>



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	Ramsar sites may need to be extended beyond 2km to study further impacts.	the predicted Ecological Zone of Influence.	the ES application document TR010029/APP/6.1). The study area was extended beyond 2 km where this was considered appropriate (e.g. during HRA scoping).
	The <b>FC</b> commented that consideration should be given to the ancient woodland adjacent to the red line boundary. They stated that the loss of woodland should be compensated for and welcomed the opportunity to be involved in any discussions on replacement planting. They also highlighted that consideration should be given to Root Protection Zones.	Further survey work was undertaken on the existing woodland to identify ancient and veteran trees. Consideration has been given to avoiding the loss of trees where possible and mitigation has been identified and includes proposals for replacement planting.	Further survey work was undertaken and is reported in an Arboricultural Impact Assessment Report that forms part of the ES (application document TR010029/APP/6.3) and also see Appendix C of the Case for the Scheme (application document TR010029/APP/7.1).
Cultural Heritage	<b>Historic England</b> drew attention to the Iron age-Romano British transition site (just to the south of the Scheme at Oak Farm) and former Maylands Aerodrome (west of the Weald Brook and north of the A12). They highlighted that the former Aerodrome is an important site in the development of civil aviation and that remains of the aerodrome structures and buried features connected with the site are likely to be present at the site along with wartime	A Cultural Heritage Assessment forms part of the ES (Chapter 11) which includes an assessment of all designated and non-designated features (application document TR010029.APP/6.1). This includes consideration of the aerodrome and the Iron age-Romano British transition site.  However, consultations with the Greater London Archaeology Advisory Service (GLAAS)	The aerodrome is included within assessments contained in Chapter 11 (cultural heritage) of the ES (application document TR010029.APP/6.1).



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	<p>defence structures. They recommended that the PIER is updated to reflect these sites and suggested that mitigation measures should preserve significant remains in the Scheme and that for the public benefit, means of enhancing the understanding and interpretation of them should be explored. They highlighted that the avoidance principle adopted for natural environment impacts should also be applied to significant heritage assets.</p>	<p>indicated that the Iron age-Romano British transition site is an early medieval site, and it is referred to as such.</p>	
	<p><b>LB Havering</b> identified the presence of one of the archaeological priority areas, impacted by the Scheme comprising alluvium and required a deposit model to form part of the DCO application to define its potential significance. The Council required a Heritage Statement to provide a stronger evidence base of the impact on 'The Grove'.</p>	<p>Clarification was sought from LB Havering as to whether a deposit model is available already or whether this is a requirement for one to be developed.</p>	<p>An archaeological assessment is included within Chapter 11 (cultural heritage) of the ES (application document TR010029.APP/6.1) and considers 'The Grove'. However, the site is not recorded on the GLHER and a site visit in March 2019 noted that, aside from its potential age, there was nothing to suggest it is of particular historic interest. It is not considered a heritage asset.</p>
	<p><b>Essex CC</b> requested that stakeholders are not consulted in isolation and commented that a study area of 500 metres is sufficient for non-designated</p>	<p>The assessment includes the impacts on the setting of heritage assets, including visual and auditory impacts in accordance</p>	<p>The study area was subsequently agreed with the relevant Historic Environment Officer at Essex CC – refer to Chapter 11 (cultural heritage) of the</p>



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	<p>Heritage Assets and Grade II listed buildings, but an additional 250 metres buffer zone is recommended for Grade I and II* listed heritage assets.</p> <p>They also stated that consideration should be given to the secondary impacts upon heritage assets, such as the potential requirement for secondary/double glazing.</p>	<p>with DMRB requirements. These are included in the Cultural Heritage chapter of the ES (application document TR010029/APP/6.1).</p>	<p>ES (application document TR010029.APP/6.1).</p>
	<p><b>Essex CC</b> recommended more extensive trail trenching.</p>	<p>A programme of archaeological works has been developed to identify and characterise known and as yet unknown archaeological remains, as well as to recommend measures to minimise, mitigate or off-set impacts. There have been archaeology works undertaken according to a Written Scheme of Investigation which has been approved by GLAAS. The Cultural Heritage chapter of the ES (application document TR010029/APP/6.1) and the Outline CEMP (application document TR010029/APP/7.2) provide further mitigation</p>	<p>Details of the proposed programme of archaeological works is set out in the Outline CEMP (application document TR010029/APP/7.2).</p>



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		measures in respect of the construction works.	
People and communities	<p><b>Essex CC</b> requested more details on the overarching health impacts either an extended, integrated EIA or standalone Health Impact Assessment. Potential socio-economic benefits associated with health should be explored in further depth along with issues of severance on connectivity with walking and cycling.</p>	<p>The health impacts of the Scheme are included within the People and Communities chapter of the ES (application document TR010029/APP/6.1).</p> <p>HE is working with ECC to identify potential improvements for the non-motorised user and these types of improvements, if a case can be made for their delivery, would be funded separately from the Scheme.</p>	<p>Details of the health impacts are outlined in Chapter 13 of the ES (application document TR010029/APP/6.1). The Scheme does not sever any existing non-motorised user facilities. The discussions with Essex CC are to address pre-existing issues within the area.</p>
	<p><b>Public Health England</b> recommended that further liaison is undertaken with local authorities on human receptors (existing and potential) and the extent, nature and composition of the existing landfill.</p>	<p>The Applicant produced a plan to identify the human receptors and this was agreed with officers from the LB of Havering and Brentwood BC (see <b>Chapter 8</b> of this report)</p>	<p>Plans of receptors was shared with the local authorities and an agreement was reached.</p>
	<p><b>Public Health England</b> commented that Health Assessments should give equal merit to physical and mental health and the cumulative impact of the</p>	<p>The health impacts of the Scheme are included within the People and Communities chapter of the ES (application document TR010029/APP/6.1).</p>	<p>Details of the health impacts are outlined in Chapter 13 of the ES (application document TR010029/APP/6.1).</p>



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	works alongside other major road schemes should be considered.		
Geology and soils	The <b>EA</b> noted that limited site investigations had been undertaken and additional detailed information would be required for the whole footprint of the Scheme along with a remediation strategy CEMP. They requested a piling risk assessment for the piled foundation to mitigate against the release of potentially contaminative substances during the works.	Following statutory consultation, the Applicant discussed the approach to site investigations with the EA and agreed the level of detail to be included in the ES (application document TR010029/APP/6.1).	Further discussions were undertaken and the approach to piling is included within the Geology and Soils chapter of the ES (application document TR010029/APP/6.1)
	<b>LB Havering</b> agreed in principle with the methodology and the proposed scope set out in the PEIR. They also commented that extensive ground investigations should be undertaken in order to assess and mitigate the risks posed by land contamination through previous landfill uses.	Following statutory consultation, the Applicant discussed the approach to site investigations with the host authorities and agreed the level of detail to be included within the ES in respect of Geology and Soils (application document TR010029/APP/6.1).	Further discussions were undertaken and the approach to ground investigations and land remediation are included within the Geology and Soils chapter of the ES (application document TR010029/APP/6.1)
Materials and waste	<b>LB Havering</b> considered that there was insufficient information available to enable a detailed assessment of the impacts of material resources and waste arising from the Scheme.	Noted. Since statutory consultation further information has been obtained regarding the construction process and is included within Chapter 12 of the ES (application document TR010029/APP/6.1).	Further information has been obtained to inform the Materials and Waste chapter of the ES (application document TR010029/APP/6.1).



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<b>Scheme principles and operation</b>			
	The <b>EA</b> is concerned that the ‘recent controlled waste deposits’ have not been taken into account and suggest topics to be included in further assessment.	Noted.	Both the Geology and Soils (Chapter 10) and Materials and Waste (Chapter 12) assessments in the ES (application document TR010029.APP/6.1) include assessments of the recently deposited material in the Scheme area.
Air quality	<b>LB Havering</b> requested that HE engages with TfL and the Council to agree suitable mitigation measures to reduce the impact of the Scheme on local air quality. The Council does not agree with the conclusion in the PEIR as the air quality impacts during construction have not been assessed. The Council requested amendments to the air quality impact assessment and further engagement.	This assessment has been carried out following Highway England’s DMRB guidance. <sup>12</sup> A qualitative assessment was carried out for the assessment of construction dust. Appropriate mitigation measures during construction are identified in the ES (application document TR010029/APP/6.1) and there would be ongoing engagement.	There has been ongoing engagement between the Applicant and LB Havering and the approach to air quality is contained in Chapter 5 of the ES (application document TR010029/APP/6.1).
Noise and vibration	<b>LB Havering</b> supports the methodology proposed for the noise and vibration and expects to work closely with HE on their proposed baseline noise surveys for the Scheme in terms of suitable monitoring locations.	Noted.	N/A

<sup>12</sup> Please refer to ES Appendix 4.1 – DMRB Sensitivity test for further information regarding recent updates to DMRB guidance and how the EIA undertaken for the scheme has taken this into account.



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
Cumulative impacts	<p><b>LB Havering</b> is extremely concerned about the potential cumulative impact arising from the Scheme, Lower Thames Crossing, Lodge Avenue Flyover (A13) and safety improvement scheme at Gallows Corner.</p>	<p>The proposed traffic management arrangements for the construction of the Scheme will aim, where possible, to minimise disruption. The Applicant is aware of the potential cumulative effects of concurrent improvement projects and potential overlapping construction programmes and will make every effort to coordinate these to minimise the impact and disruption.</p>	<p>Cumulative effects have been considered and the results of that assessment are reported in Chapter 15 of the ES (application document TR010029/APP/6.1). LB Havering, Essex CC and Brentwood BC were consulted on the list of developments included in the assessment.</p>
	<p><b>Essex CC</b> noted that there are a number of significant Highways England's transport projects within and adjoining Essex, including the Lower Thames Crossing, A12 improvements and A120 Braintree to A12. They would like to explore a consistent and co-ordinated strategic approach to the development and implementation of these projects.</p>	<p>Highways England is aware of the potential cumulative effects of concurrent improvement projects and potential overlapping construction programmes and will make every effort to coordinate these to minimise the impact and disruption.</p>	<p>The potential for cumulative effects is explained in the Assessment of Cumulative Effects (Chapter 15) of the ES (application document TR010029/APP/6.1). LB Havering, Essex CC and Brentwood BC were consulted on the list of developments.</p>
<b>Green Belt</b>			
Impact on character and openness	<p><b>LB Havering</b> stated that the Scheme would adversely impact on the borough's Green Belt and requested that further information is provided on</p>	<p>The Applicant has considered the impact of the Scheme on green belt and openness and where possible, minimised its impact.</p>	<p>An Outline LEMP is included within the ES (Appendix 7.16 application document TR010029/APP/6.3) which sets out the areas identified for appropriate</p>



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
	<p>how the impact of the Scheme on the Green Belt will be minimised and mitigated. The Council expects HE to set out how green infrastructure will play a role in the Scheme's landscape and ecological mitigation design and be involved in its review.</p>	<p>This includes keeping the proposed loop road as low as possible and proposing screen planting around its perimeter to lessen visual impacts.</p>	<p>mitigation. A draft of this document was shared with the LB Havering for comment and review. The Case for the Scheme (application document TR010029/APP/7.1) also provides an assessment of the Scheme against local and national Green Belt policy.</p>
	<p><b>Brentwood BC</b> states that consideration should be given to the importance of the Green Belt as the proposal would present a new incursion into the Green Belt.</p>	<p>The Applicant has considered the impact of the Scheme on green belt and openness and where possible, minimised its impact. This includes keeping the proposed loop road as low as possible and proposing screen planting around its perimeter to lessen visual impacts.</p>	<p>An Outline LEMP is included within the ES (application document TR010029/APP/6.3) which sets out the areas identified for appropriate mitigation. The Case for the Scheme (application document TR010029/APP/7.1) also provides an assessment of the Scheme against local and national Green Belt policy.</p>
	<p><b>Essex CC</b> encouraged further consideration being given to the Green Belt status of the land. They also commented that landscaping within the loop should create biodiversity and interest for those using the route forming a 'special view for those about to enter Essex'. This could include elevated embankments, framing of Ingrebourne river, relationship with new SuDS, ponds, reduction of intrusive buildings,</p>	<p>The Applicant has considered the impact of the Scheme on green belt and openness and where possible, minimised its impact. This includes keeping the proposed loop road as low as possible and proposing screen planting around its perimeter to lessen visual impacts. The mitigation measures for the Ingrebourne River and Weald</p>	<p>An Outline LEMP is included within the ES (application document TR010029/APP/6.3) which sets out the areas identified for appropriate mitigation. The Case for the Scheme (application document TR010029/APP/7.1) also provides an assessment of the Scheme against local and national Green Belt policy.</p>



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
	restoration and management of hedgerows, appropriate floodplain planting, visual markers and forest assets.	Brook have been developed in consultation with the EA and feedback encouraged through the supplementary consultation.	
<b>Construction Impacts</b>			
Construction Management Plan	<p><b>LB Havering</b> requested clarification from HE on the intended timing of construction and pre-construction works; HGV vehicle movements, the location of site compounds and vehicular access to/from compounds to understand the impacts. The Council requested regular dialogue during the construction phase to enable good communication with local stakeholders such as residents and businesses.</p> <p><b>Essex CC</b> outlined areas that would need addressing as the Scheme develops, including the impact of traffic management during construction, programming of delivery and disposal of material and equipment and how construction will set to the site.</p>	The proposed traffic management arrangements for the construction of the Scheme will aim, where possible, to minimise disruption. Construction of the Scheme will be subject to a traffic management plan that is also included as a requirement (DCO requirement 10) in the draft DCO (application document TR010029/3.1).	The Applicant is required to consult the relevant planning authority on the Traffic Management Plan under requirement in the draft DCO (application document TR010029/APP/3.1). The Applicant is also required to consult the relevant highway authority on the Outline CEMP as a requirement in the draft DCO.
	<b>Royal Mail</b> expressed concern about disruption to their operations during	The proposed traffic management arrangements for the construction	The Scheme will be implemented in accordance with the requirements of a traffic management plan that is also included as a requirement in the draft



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
	construction and made suggestions for inclusion in the CTMP.	of junction 28 will aim, where possible, to minimise disruption.	DCO (application document TR010029/APP/3.1).
	<b>LB Bexley</b> commented that they are geographically remote to the application site and construction works would be unlikely to have any impact upon the function of the road network within their Borough.	Noted.	N/A
<b>Non-motorised users</b>			
Health impacts	<b>Public Health England</b> stated that the ES should include mitigation for NMUs and identify opportunities to improve it.	There would be no worsening of NMU facilities as a result of the Scheme. The impact of the Scheme on the walking and cycling network has been addressed in the People and Communities Chapter 13 of the ES (application document TR010029/APP/6.1).	Each NMU has been considered on a case by case basis, and further details are provided in the People and Communities Chapter 13 of the ES (application document TR010029/APP/6.1)
Network provision	<b>LB Havering</b> reiterates its concerns about pedestrians and cyclists accessing Brook Street from the A12 Colchester Road eastbound. The Council considers the current arrangements for pedestrians and cyclists to be unacceptable and expects the Applicant to develop suitable	There would be no worsening of the NMU facilities as a result of the Scheme. However, the Applicant is pursuing wider improvements in the area from Brentwood to Romford, including an investigation into potential improvements at the junction 28 Brook Street	These types of improvements, if a case can be made for their delivery, would be funded separately from the Scheme. LB Havering have been engaged in the context of the work the Applicant is doing to look at wider improvements in the area.



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
<b>Scheme principles and operation</b>			
	mitigation measures to assist NMUs in navigating through the junction safely.	roundabout. These types of improvements are not therefore proposed as part of the Scheme.	
	<b>Brentwood BC</b> encouraged further consideration being given to the cycling and walking network.	There would be no worsening of the NMu facilities as a result of the Scheme. The impact of the Scheme on the walking and cycling network has been addressed in the People and Communities (Chapter 13) of the ES (application document TR010029/APP/6.1).	These types of improvements, if a case can be made for their delivery, would be funded separately from the Scheme. LB Havering have been engaged in the context of the work the Applicant is doing to look at wider improvements in the area
	<b>Essex CC</b> commented that severance of walking and cycling should be addressed in depth.	There would be no worsening of the NMu facilities as a result of the Scheme. The severance impact of the Scheme NMu routes is assessed and contained within the People and Communities Chapter 13 of the ES (application document TR010029/APP/6.1).	These types of improvements, if a case can be made for their delivery, would be funded separately from the Scheme. LB Havering have been engaged in the context of the work the Applicant is doing to look at wider improvements in the area

## Consultation Report Table 7.15.1

Statutory consultation response summary, section 47 consultees

**Table 7.15.1: Summary of responses from section 47 consultees**

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 47)	The outcome
Environment	Respondent G wanted to know what is being done about noise, air pollution and tree planting.	The Applicant has undertaken an EIA of the Scheme and mitigation measures are proposed.	<p>Chapter 5 of the ES (application document TR010029/APP/6.1) reports on the results of the assessment of Air Quality effects and Chapter 6 of the ES reports on the results of the assessment of Noise and Vibration effects. Further information on the maintenance of the landscape and ecological mitigation areas is available in Biodiversity chapter, Chapter 7 of the ES (application document TR010029/APP/6.1) and the further tree survey work was undertaken and is reported in an Arboricultural Impact Assessment that forms part of the ES (application document TR010029/APP/6.3).</p> <p>The mitigation required is set out in the Outline CEMP (application document TR010029/APP/7.2) and the REAC (application document TR010029/APP/7.3).</p>
Flooding/drainage	Respondent M raised concerns related to annual winter flooding in this location (a drawing was attached to the letter).	The Scheme has been designed with careful consideration of impacts on flooding and the measures necessary to address any effects on flooding have been agreed with the EA..	The FRA submitted in support of the application sets out the assessment of flooding (application document TR010029/APP/6.6).



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 47)	The outcome
General	Respondent A had a positive view as to approach to congestion, capacity, noise and air quality. Agrees with need for works	Noted	N/A
	Respondent B supports the need for the Scheme, trusts that suitable measures will be taken to protect the environment.	Noted	A REAC (application document TR010029/APP/7.3) sets out the mitigation measures that will be implemented.
	Respondent F responded that Scheme does not represent value for money. Instead consider: <ul style="list-style-type: none"> <li>- a dedicated third lane on A12 eastbound slip road to M25 northbound, avoiding traffic lights</li> <li>- dedicated lane for M25 south to A12 west traffic</li> </ul> Also add yellow boxes to the roundabout to avoid traffic blocking the junction	The Applicants scheme sets out to address the congestion on the junction 28 roundabout itself, as well as the delays experienced on the approaches, including the A12 eastbound and M25 northbound approached to the roundabout. The Applicant determined the best way to achieve this was to remove a right turn movement between the M25 and the A12 east away from the roundabout. This is because the right turn movements pass through three sets of traffic signals on the roundabout and hence have greatest impact in	Noted



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 47)	The outcome
		<p>relieving congestion on the roundabout, and its approaches. The respondent suggests removing left turn movements, which only go through one set of traffic signals on the roundabout. While this might to some extent reduce queueing on that approach, it would do little to improve congestion on the roundabout, and hence was deemed to offer low value for money against the scheme objectives.</p> <p>The Applicant has also been considering yellow boxes on the roundabout to be a good option and will be taking these forward for further consideration in the detailed design stage.</p>	
	<p>Respondent I raised severe concerns over impact from construction on residents of Woodstock Avenue &amp; Kenilworth Avenue. Request junction at Maylands Golf Course to allow U-turn.</p>	<p>The Applicant has engaged with representatives of residents, Essex CC and TfL in regard to discuss this issue (see section 8.2.2 below).</p>	<p>The Applicant is required to consult the relevant planning authority on the Traffic Management Plan under a requirement in the draft DCO application (application document TR010029/APP/3.1)</p> <p>The Applicant is required to consult the relevant planning authority on the Outline CEMP (application document</p>

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 47)	The outcome
			TR010029/APP/7.2) as a requirement in the draft DCO.
Lane widening	Respondent N requested lane widening in locations.	The Applicant has considered the request but lane widening works at the location indicated were not considered to be necessary or required as part of the Scheme.	The Applicant is undertaking road widening, where it is considered necessary, as part of the Scheme as referred to in Chapter 2 (description of the Scheme) of the ES (application document TR010029/APP/6.1).
NMU	Respondent E Improve pedestrian crossings; particularly the slip road to the A12 westbound and the slip road to the M25 southbound. Possibly the current pedestrian usage here is low, so new demand based traffic light would not impact traffic flow too much.	There would be no worsening of the NMU facilities as a result of the Scheme. However, the Applicant is working with Local Authorities to pursue wider improvements in the area from Brentwood to Romford, including an investigation into potential improvements at the junction 28 Brook Street Roundabout. These types of improvements would be funded and delivered separately from the Scheme.	These types of improvements, if a case can be made for their delivery, would be funded separately from the Scheme.
Public Health & Wellbeing	Respondent H raised concern about increases in noise and lowering of property value.	An assessment of noise and vibration impacts and the need for noise mitigation has been carried out.	Chapter 6 of the ES (application document TR010029/APP/6.1) reports the results of the Applicant's assessment of Noise and Vibration effects arising from the Scheme and measures to mitigate and minimise these effects.



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 47)	The outcome
Traffic flow environment construction impacts	Respondent C raised concern in all areas listed, very concerned about congestion, capacity, economic growth, landscape, nature conservation, impacts during construction.	The Applicant has considered all the issues raised and has carried out assessments, where appropriate.	An ES (application document TR010029/APP/6.1) submitted in support of the application contains the assessment of environmental issues whilst the Case for the Scheme (application document TR010029/APP/7.1) details the economic case.
	Cubic Transportation Ltd is associated with Respondent C and listed the same concerns.	The Applicant has considered all the areas during construction and has carried out assessments where appropriate.	An ES (application document TR010029/APP/6.1) submitted in support of the application contains the assessment of environmental issues whilst the Case of the Scheme (application document TR010029/APP/7.1) details the economic case.
	Respondent D stated proposal must address other flows of traffic, primarily A12 westbound onto M25.	Other improvements to the junction are outside of the scope of the Scheme. An explanation of the Scheme Objectives and the options considered by the applicant in developing the Scheme is provided in <b>chapter 2</b> of this report.	These types of improvements, if a case can be made for their delivery, would be funded separately from the Scheme.
	Respondent J raised concern about re-routing of heavy goods vehicles during construction process.	Any re-routing of heavy goods vehicles during construction, will, where possible to be kept to a minimum.	The Scheme will be subject to a traffic management plan as prescribed by requirement 10 in the draft DCO (application document TR010029/APP/3.1).



Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 47)	The outcome
	Respondent G said that works on A128 and A127 would be more productive and less disruptive.	Noted	These types of improvements, if a case can be made for their delivery, would be funded separately from the Scheme.
	Respondent K requested clearer lane markings on the junction 28 roundabout.	Lane markings improvements will be implemented as part of the Scheme.	Lane markings within the parameters on the Scheme will be proposed at the detailed design phase.
	Respondent L said Scheme does not deal with congestion of through traffic on A12 beneath the junction. This congestion backs up from Brook Street roundabout. There would not be enough distance between existing and new feeders for traffic to disperse. A12 from junction 28 should be widened to 3 lanes instead.	<p>The Respondent refers to congestion occurring on the A12 for through traffic due to traffic backing up from the junction 28 roundabout onto the A12 and blocking through traffic on the A12. The Applicant notes that this queueing occurs for two reasons, i) the congestion on the junction 28 roundabout blocking the circulatory carriageway of the roundabout, and ii) traffic travelling to Brentwood on Brook Street queueing up, and backing up on to the junction 28 roundabout and blocking traffic approaching from the A12.</p> <p>The Scheme removes a large movement from the roundabout, thereby improving congestion on the roundabout for many</p>	Any schemes will need to be undertaken separately from the one proposed in the current application which is designed to address congestion on the junction 28 roundabout.

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 47)	The outcome
		<p>movements, including the A12 eastbound off slip road. So in doing so this will alleviate part of the cause of the queueing on the A12 westbound off slip. The Applicant notes that Brook Street is the responsibility of Essex Highways, and has engaged with the Council to update them on the issues raised regards Brook Street and check that the Scheme does not conflict with their plans for Brook Street.</p> <p>The respondent suggests the need to improve the A12 to three lanes. The Applicant is undertaking separate investigations looking into the need for improving the A12 north of M25 junction 28; these are not within the scope of the Scheme which focuses only on improving junction 28.</p>	



# Consultation Report Annex C.11.14

Essex County Council response

## C.11.14 Essex County Council response (28.91.19)



M25 J28 Improvement Team  
Highways England  
Bridge House  
1 Walnut Tree Close  
Guildford  
GU1 4LZ

28 January 2019

**Sent by email:** [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)

For the attention of: [REDACTED]

**RE: Planning Act 2008, Section 42  
M25 Junction 28 Improvements  
Response to Statutory Consultation**

Thank you for your letter dated 30 November 2018 and for the opportunity to respond on behalf of Essex County Council (ECC) defined as S43 Local Authority and statutory consultee, to respond to the statutory consultation that opened on October 10<sup>th</sup> for the proposed new Lower Thames Crossing (LTC) by Highways England (HE).

ECC welcomes this consultation, the continuing development of this project and fully supports this project recognising the positive benefits it will bring to the region.

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

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

ECC has a long history of close working with authorities within Greater Essex, within



London Thames Gateway; South East Local Enterprise Partnership (SELEP) and the Opportunity South Essex Partnership (OSE). It will be necessary for HE to have regard to the wider regional priorities, as set out by ECC, SELEP and OSE.

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

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

ECC wishes to continue to engage with this ongoing process, and help shape the application for the Development Consent Order (DCO) application for the M25 Junction 28 Improvements.

ECC has identified a range of issues and comments regarding the Consultation documentation, which require further clarification, additional information and actions to be incorporated within the final DCO. ECC's comments are outlined below.

#### **Strategic Approach to HE engagement with ECC on Projects across Essex**

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

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

**ECC Comments by Service Area:**

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

- Highways and Transportation
- Minerals and Waste Planning
- Lead Local Flood Authority – Flood and Water Management
- Public Health and Well-being
- Strategic Planning, Economic Growth, Regeneration and Skills
- Historic Environment and Archaeology
- Landscape and Natural Environment

Highways and Transportation

The proposal which is the subject of this consultation has considered the latest traffic forecasts for the M25 which includes new developments such as the Lower Thames Crossing to ensure future traffic levels can be accommodated which is a change from the previous consultation and is welcomed by Essex County Council and other districts and in particular Basildon Borough Council. However, we want to re-iterate as outlined in our response to the Lower Thames Crossing consultation that we feel that the traffic modelling associated with this scheme potentially underestimates the level of future traffic levels as it does not take enough consideration of future growth plans. Although we appreciate that the main aims of the scheme are to improve the capacity of the roundabout circulation by removing flows from M25 south to A12 north, there appears to be a strong likelihood that traffic queues and delays from Brook Street will worsen substantially. Because this is disproportionately worse under the scheme than without it we would want to flag up the need to examine a solution for this problem as part of the detailed design of the signal configuration ideally to arrive at a better situation than forecast either for the Do Minimum scenario but also clearly when the scheme opens.

It is recommended that further consideration should be given to the timescales for project delivery and the cumulative impacts and timing with other major transport infrastructure projects and general growth in the vicinity, be it the Lower Thames Crossing, A13 road widening, A127/A130 Fairglan Interchange improvements, and the A127 route management strategy.

Although we appreciate that the main aims of the scheme are to improve the capacity of the roundabout circulation by removing flows from M25 south to A12 north, there appears to be a strong likelihood that traffic queues and delays from Brook Street will worsen substantially. Because this is disproportionately worse under the scheme than without it we would want to flag up the need to examine a solution for this problem as part of the detailed design of the signal configuration ideally to arrive at a better situation than forecast either for the Do Minimum scenario but also clearly when the scheme opens.



Brentwood Borough Council is finalising its Local plan and we would recommend that the next stage of the design considers traffic movements and pressures which may arise a J28 as a result.

Further areas that requiring addressing as the scheme develops:

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

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

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

#### Minerals and Waste Planning

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

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

The Essex and Southend on Sea Waste Local Plan - Adopted October 2017 concerns the administrative area of Essex and Southend on Sea only. These documents are publically available.

#### Lead Local Flood Authority – Flood and Water Management

ECC is the Lead Local Flood Authority (LLFA) in the two tier administrative area of Essex, and is the host authority in respect of the “Brentwood” element of the project. As such as the project develops and into the DCO process the design within in this area should adhere to ECC’s ECC Sustainable Drainage Systems (SuDS) Design Guide.

#### Public Health and Well-being

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

- A more detailed overarching health element is required as either an extended, integrated EIA or a stand -alone health impact assessment.
- We would request that Environmental Health colleagues in impacted authorities and Public Health England are consulted so to ensure that the potential environmental impacts upon human health are raised with a specific reference to include Mental Health as part of this analysis.
- The wider determinants of health, with reference to any potential socio-economic benefits, should be explored in more depth i.e. employment opportunities.
- Issues of severance from this proposal on connectivity with walking and cycling needs to be examined in further depth

#### Strategic Planning, Economic Growth, Regeneration and Skills

The junction plays a vital role in connecting the M25 with the A12 in Essex, as well as providing local access to several local transport routes.

It is acknowledged that up to 7,500 vehicles per hour currently travel through the roundabout at peak times. The junction is often operating at, or close to capacity, resulting in traffic queues and delays resulting in unreliable journey times.

Going forward, the County Council is keen to work in partnership with Highways England and relevant authorities, whose growth in their emerging Local Plans will impact on the operation of junction 28. At present, the current mitigation scheme only provides a mitigation for the south to east strategic traffic movement.



Brentwood Borough Council is finalising its Local plan and we would recommend that the next stage of the design takes into account traffic movements and pressures which may arise as a result. Account needs to be taken on the Brentwood Enterprise Park proposed in Brentwood's Draft Local Plan, which is located at M25 Junction 29 to the south of the scheme study area. It should be noted that this strategic allocation is within both the permanent and temporary land requirements for the Lower Thames Crossing Scheme.

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

#### Historic Environment and Archaeology

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

Consideration should be given to secondary impacts upon heritage assets, such as the potential requirement for secondary/double glazing which may arise as a result of increased noise pollution, or the erection of new or taller boundary treatments to screen views.

ECC considers that it is important that the impact of increased heavy goods vehicles associated with construction is assessed, and access/transport arrangements altered if there is potential for direct harm.

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

ECC therefore recommends more extensive trial trenching than perhaps the geophysics results suggest may be needed. This will obviously depend on the survey results and design of the scheme.

#### Landscape and Natural Environment

The PEIR for this NSIP has been reviewed by competent experts in accordance with the EIA Regulations and Highways England guidance.

We have reviewed the PEIR documents available. We welcome the robust approach to survey and initial assessment of potential impacts of this NSIP on all the relevant designated sites and protected and Priority habitats & species. Although further consideration still needs to be given to indirect impacts eg air quality, appropriate

mitigation and compensation measures have been developed to minimise adverse impacts on ecological features as agreed with DfT. In delivering new schemes, the Government expects applicants to avoid and mitigate environmental impacts in line with the principles set out in the NPPF and the Government's planning guidance (NN NPS).

There will be opportunities to enhance parts of the site, in particular by creating Priority Habitats such as hedgerows, to improve connectivity across the landscape to mitigate for disconnections caused by the new road. The Ecology chapter of the Environmental Information Report should thoroughly explore all reasonable options to enhance the development for biodiversity including Protected and Priority Species to support the HE Biodiversity Action Plan and in response to local conservation priorities.

We note that the NN NPS requires that "Where a development may negatively affect any priority habitat or species on a site for which they are a protected feature, any Imperative Reasons of Overriding Public Interest (IROPI) case would need to be established solely on one or more of the grounds relating to human health, public safety or beneficial consequences of primary importance to the environment."

Paragraph 5.25 of the NN NPS states that:

"development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought."

If the Project proposals will negatively affect a Priority habitat or species, then the case for IROPI should be set out in detail within the Environmental Statement (ES). However whilst the NPS NN only requires mitigation for significant impacts on Priority habitats & species, the LPA and the SoS for Transport also have a duty to conserve these s41 habitats and species. This extends to all impacts, not just significant ones, in order to demonstrate compliance with their legal duty set out in Natural Environment and Rural Communities Act, 2006. We therefore expect to find adequate compensation measures identified within any IROPI case within the ES for implementation in full.

The NPS NN also requires the NSIP to clearly set out any likely significant effects on designated sites including locally designated sites of ecological or geological conservation importance. Furthermore, the applicant should show the extent to which the project has taken advantage of opportunities to conserve and enhance biodiversity. There are four Local Wildlife Sites (LoWS) - The Oaks LoWS, Lower Vicarage Wood LoWS, Jackson's Wood and Tyler's Shaw) LoWS - within the scheme boundary and Foxburrow Wood LoWS is adjacent to the scheme and also could be impacted.

We note that the PEIR identifies the opportunities to protect and enhance biodiversity and geological conservation interests and to offset or compensate for any residual negative losses. These opportunities need to be tailored to those interests affected by the Project and those of relevance within the locality, ensuring compensation and/or offsetting is retained.



We would welcome the opportunity for a Project biodiversity topic group to work closely with the landscape and other topic groups to ensure that environmental impacts during construction will be minimised and that compensatory measures are developed in an integrated manner to deliver multiple benefits.

Highways England's Biodiversity Plan has been designed to deliver no net loss of biodiversity on the strategic road network by 2020 and to achieve net gain by 2040. In order to support this target, the PEIR identifies the need for the Project to place biodiversity at the heart of the design process and explore opportunities for delivering a net gain for biodiversity. This NSIP should therefore aim for net gain for biodiversity, which will require offsite compensation to meet the standard identified at scoping stage. However, all likely impacts are being assessed and the mitigation hierarchy applied.

The surveys and assessment of impacts on Protected and Priority Species appears to be robust and in line with best practice and embedded mitigation, and so is welcomed. Appropriate procedures will need to be incorporated into the Construction Environmental Management Plan (CEMP) and Landscape & Ecology Management Plan (LEMP) for the Development. We look forward to the opportunity to comment on these documents when are produced.

Until there is sufficient ecological information on protected & priority species, it is not recommended that the principles of ecological issues can yet be included in the Statement of Common Ground (SoCG) with ECC if it is asked to prepare such a document.

It is recommended that the term notable is avoided when referring to Priority Habitats and Species as this has a specific definition relating to IUCN rarity rating eg presence of species in a set number of 1km squares nationally which is not relevant to habitats. However it is welcomed that this information will allow the SoS for Transport to demonstrate they have discharged their biodiversity duty under the NERC Act 2006.

Stands of invasive non-native plant species have been identified in discrete locations within the proposed Development Boundary. Appropriate procedures will need to be incorporated into the Construction Environmental Management Plan (CEMP) and Landscape & Ecology Management Plan (LEMP) for the Development.

Whilst we note the reference to an outline Environmental Management Plan (EMP), the Council expects provision of both a Construction Environment Management Plan (CEMP) and Landscape and Ecological Management Plan (LEMP) to be Requirements of the DCO. It is therefore recommended that these documents are drafted before submission. If there will be a residual loss of habitat, sufficient compensation needs to be provided and confirmation of offsite habitat compensation measures.

The above issues require additional consideration to avoid them being included in the LIR and to allow the Secretary of State to demonstrate they have met their s40 biodiversity duty. This Council would be keen to see clarification in the Environmental Statement produced relating to Priority s41 Species, which are likely to be present and affected by the development.

Opportunities to deliver enhancements need to be explored in consultation with appropriate stakeholders as a mechanism to deliver net gain for biodiversity. This is in

line with The NN NPS Paragraph 5.33 and reasonable opportunities to deliver environmental benefits as part of schemes are required under Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009. Opportunities for transport to contribute to the creation of coherent and resilient ecological networks are championed by Highways England's Biodiversity Plan. Indeed the NN NPS also states that "When considering proposals the SoS should consider whether the applicant has maximised such opportunities in and around developments. The SoS may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered." A monitoring strategy is also supported with clear objectives outlined for those significant environmental effects that remain following mitigation.

There will be opportunities to enhance parts of the site, in particular by creating Priority Habitats such as hedgerows, to improve connectivity across the landscape particularly to mitigate for disconnections caused by the new road. The Ecology chapter of the ES should thoroughly explore all reasonable options to enhance the development for biodiversity including Protected and Priority species to support the HE Biodiversity Action Plan.

This Council notes that following its request at EIA scoping (Sept 2018) to seek data from Essex Field Club (EFC) this information will be obtained for the ES. This will inform any additional survey requirements to ensure the results can be considered adequate. Records from new or updated surveys undertaken should be shared with both EWT and EFC records centres.

This Council is pleased to see that the PEIR contains information in relation to how it meets the requirements of NN NPS on decision making (and mitigation) eg The Secretary of State should have regard to the Government's biodiversity strategy, which includes aims to ensure a halting, and if possible a reversal, of declines in Priority Habitats and Species, with wild species and habitats as part of healthy, functioning ecosystems.

This Council agrees with PINS scoping opinion comment that the applicant has scoped out bat surveys despite paragraph 8.89 of the Scoping Report, which states that these habitats may be of value to foraging and commuting bats. Five species were identified in the desk study in the PEIR and it is noted that Bats will now be included in the assessment for potential loss of foraging habitat (Section 4) and NE have been consulted on this issue but as of the date of this report, a response is awaited. This Council recommends bat surveys particularly for Nathusius' Pipistrelle during the Autumn migration and use of the National Nathusius' Pipistrelle Project results may be useful to the development.

This Council has not yet had the opportunity to review a draft Construction Environment Management Plan (CEMP) and recommends that this is agreed as soon as possible ahead of DCO submission to inform this as a Requirement, and include all the details in the BS42020:2013 model condition D.4.1.

We note that an Outline Ecological Management Plan has been prepared and is linked to the Code of Construction Practice (CoCP). We would urge that the ecology and landscape matters are cross referenced with final lighting strategy and recommend a combined long-term Landscape and Ecological Management Plan (LEMP) as a



Requirement of the DCO. Mitigation and Compensation should be prepared and that management of any offsite compensatory habitat will be contained in the LEMP which is referenced in 6.3.1 of the Outline EMP.

**Section Specific Comments:**

The following table provides more specific comments by section:

Section	Comment
2.5.1	We welcome the reduction in likelihood of needing to realign the watercourses where two multi-span bridges will pass over the existing watercourses (Weald Brook and River Ingrebourne) with the abutments no less than 8 m from the edges of the watercourse, thereby reducing impacts on the existing river banks and floodplain.
2.6.1	We welcome the preliminary environmental design and mitigation measures that are being considered for incorporation into the Scheme.
4.5.2	We would strongly support the inclusion of 'enhancement' i.e. provision of measures over and above those needed to mitigate the adverse impacts, and/or maximising the opportunities for beneficial impacts from the proposals. At EIA scoping stage, we welcomed the approach of "No Net Loss and Net Gain for biodiversity". This should be based on the ' <i>Biodiversity Net Gain - Good practice principles for development</i> ' which can be found here: <a href="https://www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf">https://www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf</a> . We therefore expect the scheme to provide overall biodiversity enhancements and recommend use of the Defra Metric in order to demonstrate loss and gain.
7.2.3	We note that a 2 km area was chosen for the desk study on statutory designated sites (other than SACs designated for bats), Special Protection Areas (SPAs), Wetlands of International Importance (Ramsar sites) and Sites of Special Scientific Interest (SSSIs). The use of the maps on MAGIC website is recommended to check on Zones of Influence for statutory designated sites this NSIP as these may identify the need for assessment of impacts on sites further afield than 2km.  It is also recommended that the term notable is avoided when referring to Priority Habitats and Species as this has a specific definition relating to IUCN rarity rating eg presence of species in a set number of 1km squares nationally which is not relevant to habitats. However it is welcomed that this information will allow the SoS for Transport to demonstrate they have discharged their biodiversity duty under the NERC Act 2006.
7.4.2, 7.6.3, Table 7.3, 7.6.20	Please note that, as advised at EIA scoping stage, Local Wildlife Sites are generally abbreviated to LoWS in Essex.

Section	Comment
7.4.11, 7.4.16, 7.6.53, 7.5.54, 7.6.55, 7.6.75, 7.7.11, 7.7.16	It is recommended the use of notable is avoided when referring to Priority species as this has a separate and a specific definition (see general comments above)
7.4.44	Although the ground level tree assessment for bats was undertaken in March, why was it undertaken initially in August which is a sub optimal time as foliage obscures Potential Roost Features (PRFs)?
7.4.47	<p>Reference should be made for inspection of PRFs using an endoscope to the surveyor holding a level 2 survey licence. As the timing of climbing inspections is not stated, further information may be needed to confirm use of bats at different times of their year eg hibernation, maternity, nursery or mating.</p> <p>Rather than wait to construction phase and use soft felling techniques (appropriate for health &amp; safety tree works), it is recommended that emergence surveys of the 47 trees identified with low to high potential PRFs need to be carried out at different times of year in line with Bat Tree Habitat Key recommendations. This will inform the likelihood of bat roosts being disturbed and causing delays where a licence needs to be obtained before felling.</p> <p>We look forward to Natural England's consultation response on the approach to be taken for surveying and assessing PRFs for bats in trees, as it should follow best practice. The initial ground level tree assessment for bats was undertaken in August which is a sub optimal time as foliage obscures PRFs. The survey and assessment needs to provide certainty to the Sec of State of likely impacts from the Project and effective mitigation measures will need to be secured either under a European Protected Species (EPS) mitigation licence or as a Requirement of any consent issued. We are therefore concerned that the assessment of the resource will not be sufficient to identify where populations of bats are likely to be adversely affected, and to ensure that these have the necessary secondary surveys to provide evidence of use by bats to inform any EPS Mitigation Licence application. This could be an issue for the ES, which needs to support the DCO, as it needs to include sufficient ecological information to allow the Inspector to fully consider if the NPS requirements will be met.</p> <p>As Essex Bat Group have been running a woodland project at nearby Weald Country Park (8 species recorded including Barbastelle – an Annex II species), they may be able to provide additional information regarding likelihood of bats being affected by the Scheme. We suggest that the records of Brandt's bat should be verified by Essex Bat Group before these are included in the ES.</p> <p>The issue with bat roost surveys of trees requires careful consideration to ensure it provides certainty of impacts on bats in line with Natural England's licensing policy 4 and avoid it being included in the Local Impact Report (LIR)</p>



Section	Comment
	<p>as well as to allow the Secretary of State to demonstrate they have met their legal duty to European Protected Species. In addition:</p> <ol style="list-style-type: none"> <li>1. It is recommended that bat activity data is added to the assessment of any Important Hedgerows in line with other NSIPs e.g. Any passes of Barbastelle (Annex II species) or more than 100 passes of other species of bat. Analysis of any crossing points survey results from static bat detectors will need to consider this species in particular.</li> <li>2. Although the PEIR includes details for timings of bat surveys, there is no reference to the Bat Tree Habitat Key <a href="http://battreehabitatkey.co.uk/">http://battreehabitatkey.co.uk/</a> (H. Andrews, 2016). We recommend the recent publication: <i>BTHK, 2018. Bat Roosts in Trees – A Guide to identification and Assessment for Tree-Care and Ecology Professionals. Exeter, Pelagic Publishing</i> – is also considered. As there is no certainty on this matter, we are therefore concerned that PRFs could be missed and so further assessment is considered necessary, particularly to identify any hibernation roosts in trees of all sizes.</li> <li>3. There will be a need to cross reference all lighting design requirements with landscape/ecology sections of the Environmental Statement and embed these in the LEMP.</li> </ol>
7.4.53	<p>As the survey season for Dormouse in East Anglia starts and finishes later than in the West country, it is noted that the final visit planned would be November.</p>
Table 7.6	<p>The use of the phrase “The Scheme <i>resides</i>” in part of the SINC” should be amended to <i>located</i> which would be a more appropriate term. We recommend that assessment of impacts on Local Sites also includes Local Geological Sites (LoGS). There is no reference to these in Chapter 10 of the PEIR (Geology) but GeoEssex <a href="http://geoessex.org.uk/index.html">http://geoessex.org.uk/index.html</a> can provide this information to HE.</p>
Table 7.3	<p><b>It is welcomed that the following could be considered to be of UK or National Value:</b>          Areas of key/priority habitats identified in the UK BAP; including those published in accordance with Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006) and those considered to be of principal importance for the conservation of biodiversity (HPIs) and          Areas of Ancient Woodland e.g. woodland listed within the Ancient Woodland Inventory.</p> <p>However it is noted that Priority Species are not referenced in this table.</p>
Table 7.6	<p>Phrase “The Scheme <i>resides</i>” in part of the SINC” – should be SMI - and <i>located</i> would be more appropriate term.</p>
7.6.5	<p>We support further survey for veteran trees to be undertaken as part of the arboricultural survey to be carried out during the Preliminary Design Stage.</p>

Section	Comment
	The UK Government Standing Advice for <i>Ancient woodland, ancient trees and veteran trees: protecting them from development</i> , states that these features are irreplaceable. The existing condition and proposed compensation measures should therefore <u>not</u> be considered as part of the assessment of the merits of the development proposal and compensation should only be used as a last resort. We would seek detailed engagement on the potential locations and methodologies for any translocation of ancient woodland soils and new woodland planting before considering this issue for the Local Impact Report (LIR) and SoCG.
7.6.52	We note that suitable habitat exists within the scheme boundary for both Stag beetle and Alder flea-weevil which are Priority Species.
7.6.62 -66	We note that GCN were found in Ponds 2 (medium 22), 3 (small 2) ,4 (small 6) and 5 (medium 21). With a meta population confirmed within 100-400m of the scheme, mitigation will be necessary within the CEMP to avoid impacts during construction.
7.6.68-69	We note that breeding common lizard (Priority species as well as protected from killing & injury) were found during surveys within the scheme boundary. Records of Grass snake, Slow worm and Adder were also provided in the desk study. Mitigation will be necessary within the CEMP.
7.6.75, Table 7.10	This text should be checked as only five species of birds are Priority species (Dunnock, Kingfisher, Reed Bunting, Song Thrush and Starling) not six.
7.6.80 - 7.6.87	Essex Bat Group woodland project at nearby Weald CP – 8 species recorded including Barbastelle (Annex II species) Recommend emergence surveys of 47 trees with low to high potential PRFs (ie not negligible!) at different times of year in line with BTHK recommendations. We would question records of Brandt's bat without verification by EBG/LBG.
7.6.96	As badgers and active setts were recorded during surveys, mitigation will be needed in CEMP and possibly a licence if any setts need to be closed.
7.6.104	We welcome the inclusion of Priority species in surveys and note that records of Harvest Mouse and Hedgehog. Mitigation measures will need to be included in the CEMP.
7.6.105 – 109.1	NNIS will require actions in the CEMP.
7.7.10 Potential impacts on designated sites & features	Currently no potential impacts on ancient trees have been identified. However, further survey is required to confirm the presence or absence of veteran trees, and any potential impacts on them. We request that this reference is amended to Veteran trees as these may not be ancient.
7.7.20 - 31	<ul style="list-style-type: none"> <li>7.7.20 -23 There is potential for several Priority Species including stag beetle and alder flea-weevil to be present within the Scheme boundary. The Scheme will potentially lead to the loss of habitat which</li> </ul>



Section	Comment
Potential impacts on species	<p>supports invertebrates either as shelter, a food source or as material for egg laying. This impact is considered to be direct, negative and permanent although in some areas temporary. Impacts to woodland would be minimised through mitigation. However, the construction of the Scheme will likely involve some works which could impact stag beetle and other wood associated species, should they be present. Mitigation will be needed in CEMP and compensation in LEMP.</p> <ul style="list-style-type: none"> <li>7.7.29 As GCN habitat within the Scheme on the western side of the Weald Brook is suitable for supporting great crested newts, we note that there is the potential for a direct, negative, non-reversible impact to occur on individual newts due to injury and harm from construction activities. There will also be an indirect, permanent impact as a result of the loss of terrestrial habitat. It is considered that the effect of the Scheme on great crested newts will be of moderate significance. Mitigation will need to be included in the CEMP including a EPS mitigation licence with compensatory requirements secured.</li> <li>7.7.30-31 We note that there is the potential for reptile species to be harmed during clearance of vegetation and during construction works due to the movement of vehicles, installation of compounds and access routes and the construction activities themselves. This potential impact would be negative, direct, non-reversible and permanent. In addition, there will be the permanent loss of foraging and shelter habitat as a result of the construction of the Scheme which would be a negative and indirect impact. Mitigation will need to be included in the CEMP</li> </ul>
Table G.1	All references to Habitats Regulations need updating to 2017.

If you require further information or clarification on any points raised in this response please contact Gary MacDonnell below.

Kind regards,



Director Highways and Transportation  
 Essex County Council

Enquiries:   
 Telephone: 

Email: 

M25 J28 Essex CC Issues Tables.docx

October 2019



October 2019

Essex County Council Issues Table

Issue	HE Comment	Status
<b>Statement of Community Consultation</b>		
Statement of Community Consultation –  Agreement on the scope of the SoCC	SoCC was sent in draft to ECC in October 2018 and format was agreed upon	Agreed
<b>Cumulative Effects</b>		
List of sites –  Agreement on list of sites for consideration of cumulative effects	A list of cumulative effects was circulated to ECC in March 2019 and the sites were agreed upon.	Agreed
<b>Traffic and Transport</b>		
Traffic delay on Brook Street –  Likely that the proposal would worsen delays from Brook Street. This will need to be solved in detailed design, ideally better than the Do Minimum scenario.	The scope of the project is concerned with the provision of a dedicated link to connect the M25 anti-clockwise and A12 eastbound carriageways. The project has been liaising with Essex County Council to try and resolve issues along Brook Street. The provision of an additional set of traffic signals on the J28 roundabout at Brook Street is not feasible due to limited vehicle storage capacity on the roundabout at this location. One potential option being considered is to introduce extended all red / intergreen phase at the A12 East off-slip and Circulatory signals to provide some gaps in traffic aimed to help the A1023 traffic join the circulatory carriageway. Highways England will continue to liaise with Essex CC to assist them in identifying a longer term solution to this problem.	In progress
Interaction with other schemes –  Attention to timing of this project in conjunction with other local infrastructure projects to avoid cumulative impacts (Lower Thames Crossing & Fairglen Junction)	The proposed traffic management arrangements for the construction of junction 28 will aim, where possible, to minimise disruption.  Highways England are aware of the potential cumulative effects of concurrent improvement projects and overlapping construction programme and will make every effort to coordinate these to minimise the impact and disruption. Highways England will consult with all relevant authorities prior to construction commencing.	In progress
Construction traffic –	The proposed traffic management arrangements for the construction of junction 28 will aim, where possible to minimise	In progress

Need to address CTMP, delivery & disposal of material, employee access to site.	disruption, including deliveries and access to the site.	
Wider impacts –  Requires further data regarding impact on surrounding areas, including increase in traffic, interrelated transport movements, implications on public byway to the south.	Data will be available as part of our DCO submission and we will continue to liaise with Essex CC on this. This will include assessments based on the junction 28 strategic model developed in Stage 3, which allows us to examine the impacts of the scheme on the wider area.	In progress
Traffic flow –  Consider and integrate proposals and subsequent traffic flow with the emerging Brentwood Local Plan including Dunton Hills Garden Village allocation.	The Stage 3 traffic model includes all the committed development (land use and transport developments) in the local area likely to have an impact on traffic conditions in and around junction 28. The development and assessment of the scheme have been taken based on these traffic conditions and the impact on the wider area has been assessed.	Agreed
General Scheme –  Supports the need for improvement works at J28, which will assist and enable future development	Noted and agreed	Agreed
Mitigation –  Special attention to the impact (esp. during construction) to the area within the "loop"	The proposed traffic management arrangements for the construction of junction 28 will aim, where possible, to minimise disruption. Full mitigation proposals would be included within the REAC which forms part of the ES.	In progress
<b>Biodiversity</b>		
Habitat enhancement –  There may be opportunities to enhance parts of the site through Priority Habitats and landscape connectivity. Negative impacts on Priority Habitats & Species must be justified as an IROPI in the Env Statement	We are looking into opportunities to enhance the site through creating / enhancing priority habitats and improving connectivity. Full details would be provided within the Environmental Mitigation Plan included within the ES.	In progress
Biodiversity topic group –  Would welcome the opportunity for a project biodiversity topic group to work together on environmental impacts	A specific discussion regarding biodiversity and ecology has taken place. HE agree that continued engagement over the final Environmental Mitigation Plan is beneficial.	In progress
Biodiversity net gain –  Project should aim for net gain biodiversity which will involve off-site compensation and monitoring	HE's Road Investment Strategy states that the company currently aims to reduce the rate of loss of biodiversity by 2020, and that by 2040 it must deliver a net gain in biodiversity. Net gain will be sought where possible and a design to	Agreed



	minimise / compensate for loss of aquatic habitat is being investigated.	
CEMP –  CEMP and LEMP must consider residual loss of habitat and compensation	Noted and agreed	Agreed
Bats –  Bat surveys recommended particularly for Nathusius Pipistrelle during autumn migrations.	Bat surveys have been undertaken and included autumn surveys.	Agreed
Lighting strategy –  Urges that ecology and landscaping should be cross referenced with lighting strategy in Ecological Management Plan.	Noted	Agreed
Study Areas –  Desk study area for SACs, SPAs, SSSIs, Ramsars, may need to be extended beyond 2km to study further impacts.	Will be investigated, particularly along the aquatic corridors it may be necessary to extend beyond 2km.	In progress
Tree surveys –  Emergence surveys of trees with low to high potential PRFs will need to be carried out at different times to correspond to Bat Tree Habitat Recommendations. Initial assessment was undertaken at suboptimal time, may affect validity in consideration. Advise to consult with Essex Bat Group. Bat activity data should be added to assessment of Important Hedgerows. Bat Tree Habitat Key should be referenced.	Additional survey work has taken place in 2019 which has identified the location of veteran trees. The removal of veteran trees has been avoid where at all possible through design amendments.  2 veteran trees will require removal where the new A12 off slip is proposed. This will be covered in detail within the ES.	Agreed
Tree surveys –  Further survey to veteran trees under arboricultural survey is supported. Detailed engagement sought for new woodland or translocation of woodland soil	A survey of veteran trees has been undertaken. Full details of any tree removal will be set out within the ES.	Agreed
Landscaping –  Landscaping within the loop should create biodiversity and interest for those using the route forming a "special view for those about to enter Essex". Could include elevated embankments, framing of Ingrebourne river, relationship with new SuDS ponds, reduction of	Noted. The Landscaping Chapter of the ES and Environment Mitigation Plan will detail the proposed habitat creation.	In progress

intrusive buildings, restoration and management of hedgerows, appropriate flood plain planting, visual markers and forest assets		
<b>Historic Environment</b>		
Heritage assets –  Consideration should be given to secondary impacts upon heritage assets e.g. need for double glazing	Assessment includes impacts to the setting of heritage assets, including visual and auditory impacts	In progress
Trial trenching –  More extensive trial trenching may be needed dependent on survey results and scheme design	A programme of archaeological works will be developed to identify and characterise known and as-yet unknown archaeological remains, as well as to recommend measures to minimise, mitigate or off-set impacts.	In progress
<b>Public Health and Wellbeing</b>		
Health Impact Assessment –  Detailed overarching health element is required in EIA or HIA.	Noted - impacts on human health are being considered within the People and Communities Chapter of the ES	Agreed
Mental Health - Environmental Health and Public Health England should be consulted also in regard to mental health	Noted - PHE have commented on this aspect	Agreed
Severance - Severance of walking and cycling connectivity should be addressed in depth.	Aspects of / provision for the Non-Motorised User facilities are subject to securing funds outside this scheme budget. We are pursuing the alternative funding stream options and as such as present, is not confirmed	In progress

Specialist Officers required:

- Highways Officer;
- Ecology Officer;
- Environmental Health Officer;
- Tree Officer;
- Conservation Officer




19-09-09 DRAFT Essex County Council single response  
M25 J28.docx

November 2019

Supplementary Consultation ECC Response 1

Brian Gash  
Senior Project Manager  
Highways England  
Bridge House  
1 Walnut Tree Close  
Guilford  
GU1 4LZ



Our ref: MW/G&D/J28  
Your ref: HE551519/2019/EC  
C  
Date: 27 November 2019

Dear Mr Gash

**M25 Junction 28 Improvement Scheme.  
Supplementary Consultation to Highways England's Proposed Junction 28  
Improvement Scheme (04 November 2019 t 02 December 2019)**

Thank you for the opportunity to respond on behalf of Essex County Council (ECC) to the above as requested in your e-mailed letter to us on the 31 October 2019, together with the Supplementary Consultation Brochure This explains that since the last statutory consultation new potential impacts have been identified, together with changes to the schemes red lined boundary, and this requires the views and feedback of these changes to be considered prior to the eventual Development Consent Order (DCO) submission to the Planning Inspectorate.

Please note that our comments relate to the changes as set out in the consultation only.

As stated in our response to the Statutory Consultation earlier in the year we are pleased to note that the proposal has considered the latest traffic forecasts for the M25 which includes new developments such as the Lower Thames Crossing to ensure future traffic levels can be accommodated. This is welcomed by Essex County Council.

However, we want to re-iterate as outlined in our response to the Lower Thames Crossing consultation that we feel that the traffic modelling associated with this scheme potentially underestimates the level of future traffic levels as it does not take enough consideration of future growth plans.

It is recommended that further consideration should be given to the timescales for project delivery and the cumulative impacts and timing with other major transport infrastructure projects and general growth in the vicinity, be it the Lower Thames Crossing, A13 road widening, A127/A130 Fairglen Interchange improvements, and the A127 route management strategy. All of these projects have moved on significantly since the statutory consultation.

We flagged in our response to the statutory consultation that whilst we appreciate that the main aims of the scheme are to improve the capacity of the roundabout circulation by removing flows from M25 south to A12 north, there appears to be a strong likelihood that traffic queues and delays from Brook Street will worsen substantially. Because this is disproportionately worse under the scheme than without it we would want to flag up the need to examine a solution for this problem as part of the detailed design of the signal configuration ideally to arrive at a better situation than forecast either for the Do Minimum scenario but also clearly when the scheme opens. We note that the project team have been very open to discussing these concerns, however we are becoming more concerned that the proposal will result in a shift of congestion further into Brentwood without very strong mitigation measures. We would encourage the project team to take a proactive lead in tabling solutions to this issue and co-ordinate discussions between the project team with both Brentwood Borough and Essex County Councils.

Brentwood Borough Council is finalising its Local Plan and we would recommend that the next stage of the design considers traffic movements and pressures which may arise at and surrounding J28 as a result.

Further areas that requiring addressing as the scheme develops:

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

The strategic routes referred to above provide connectivity within Essex and connect Essex to London and the wider UK and are vital for connecting the economies of Essex and London. ECC needs to be satisfied that any impacts on the strategic routes



connectivity, capacity and resilience are addressed and potential benefits for the Essex economy are optimised. ECC requires further data and analysis on the wider strategic routes to:

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

### **Cycling Connections:**

- This area of Brentwood Borough and the M25 is also an AQMA and we would be interested to learn how the scheme addresses this issue
- We are also mindful of the need for local cycling connections in the vicinity and would welcome further discussion on this in terms of linkages between Brentwood and Havering

We attach the AQMA boundary below, currently the levels of No2 are below the threshold but with the significant lengthening of the queue we would appreciate the predictions not just in the area of the AQMA but also any data you have on impact further along Brook Street, especially of relevance if the queueing is to increase in scale:



There has been series of beneficial meetings held over the previous months with colleagues from Havering Council and attended by Essex Pace Services who provide them with expert advice on issues such as but not limited to archaeology, ecology etc. The Council supports the views as held by Havering Council on such issues and recommends that all methods of mitigation to lessen the impact of the development on the environment and matters not specifically referred to in this letter are included in the eventual DCO submission.

If you require further information or clarification on any points raised in this response please contact Mark Woodger, Principal Planning Officer (Major Development and New Communities) by email [mark.woodger@essex.gov.uk](mailto:mark.woodger@essex.gov.uk).

Yours sincerely

Graham Thomas  
Head of Planning

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M25 J28 Response Nov 2019 - Final.docx

November 2019

Supplementary Consultation ECC Response 2



**21<sup>st</sup> November 2019**

Highways and Transportation comments on M25 J28 Non Statutory Consultation

As stated in our response to the Statutory Consultation earlier in the year we are pleased to note that the proposal has considered the latest traffic forecasts for the M25 which includes new developments such as the Lower Thames Crossing to ensure future traffic levels can be accommodated. This is welcomed by Essex County Council.

However, we want to re-iterate as outlined in our response to the Lower Thames Crossing consultation that we feel that the traffic modelling associated with this scheme potentially underestimates the level of future traffic levels as it does not take enough consideration of future growth plans.

It is recommended that further consideration should be given to the timescales for project delivery and the cumulative impacts and timing with other major transport infrastructure projects and general growth in the vicinity, be it the Lower Thames Crossing, A13 road widening, A127/A130 Fairglens Interchange improvements, and the A127 route management strategy. All of these projects have moved on significantly since the statutory consultation.

We flagged in our response to the statutory consultation that whilst we appreciate that the main aims of the scheme are to improve the capacity of the roundabout circulation by removing flows from M25 south to A12 north, there appears to be a strong likelihood that traffic queues and delays from Brook Street will worsen substantially. Because this is disproportionately worse under the scheme than without it we would want to flag up the need to examine a solution for this problem as part of the detailed design of the signal configuration ideally to arrive at a better situation than forecast either for the Do Minimum scenario but also clearly when the scheme opens. We note that the project team have been very open to discussing these concerns, however we are becoming more concerned that the proposal will result in a shift of congestion further into Brentwood without very strong mitigation measures. We would encourage the project team to take a proactive lead in tabling solutions to this issue and co-ordinate discussions between the project team with both Brentwood Borough and Essex County Councils.

Brentwood Borough Council is finalising its Local Plan and we would recommend that the next stage of the design considers traffic movements and pressures which may arise at and surrounding J28 as a result.

Further areas that requiring addressing as the scheme develops:

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

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

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

### **Cycling Connections:**

- This area of Brentwood Borough and the M25 is also an AQMA and we would be interested to learn how the scheme addresses this issue
- We are also mindful of the need for local cycling connections in the vicinity and would welcome further discussion on this in terms of linkages between Brentwood and Havering

We attach the AQMA boundary, currently the levels of No2 are below the threshold but with the significant lengthening of the queue we would appreciate the predictions not just in the area of the AQMA but also any data you have on impact further along Brook Street, especially of relevance if the queueing is to increase in scale:



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## Consultation Report Table 9.8.2

Supplementary Consultation Responses summary, section 42  
consultees

**Table 9.8.2: Summary of responses from section 42 consultees – supplementary consultation**

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
Adjacent woodland	<p>FC - Alder wood would become closer to live traffic than currently would appreciate discussion about appropriate long-term management as this has not been included in supplementary consultation.</p>	<p>Noted.</p> <p>Alder Wood will be retained by the current landowner on completion of the Scheme.</p> <p>However, given the closer proximity of live traffic to the trees in Alder Wood, any retained specimens would be assessed by an arboriculturist as part of any supervisory work undertaken during the construction of the scheme.</p> <p>These assessments would inform on a priority basis any tree works deemed necessary to reduce the risk of harm to adjacent road users.</p> <p>On completion of the Scheme the management of the woodland would revert back to the current landowner, including the duty of care owed to adjacent road users. Prior to this handover any tree risk management</p>	<p>Scheme impacts to woodland are outlined within Biodiversity, Chapter 7 of the ES (application document TR010029/APP/6.1) and mitigation measures are outlined in the REAC (application document TR010029/APP/7.3). Long term management is outlined in the Outline LEMP (Appendix 7.16, application document TR010029/APP/6.3).</p>

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
		operations would be undertaken as part of the Scheme.	
Active travel improvement	<b>Brentwood BC</b> would welcome the pedestrian and cycle network improvement to be developed alongside the rest of the Scheme	There would be no worsening of the NMU facilities as a result of the Scheme. However, the Applicant is working with Local Authorities to pursue wider improvements in the area from Brentwood to Romford, including an investigation into potential improvements at the junction 28 Brook Street Roundabout. These types of improvements would be funded and delivered separately from the Scheme.	The impact of the Scheme on NMUs are provided in the People and Communities Chapter 13 of the ES (application document TR010029/APP/6.1).
Air Quality	<b>Essex CC</b> - site is an AQMA - it is queried how the Scheme addresses this.	There has been ongoing engagement between the Applicant, Essex CC and LB Havering with regards to this topic.	This is addressed within the Air Quality assessment provided in Chapter 5 of the ES (application document TR010029/APP/6.1).
Ancient Woodland	<b>FC</b> - any ancient woodland must be identified, and impacts are fully considered, and impacts avoided.	Work was undertaken to identify ancient woodland, with consideration given to the impacts.	The Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) outlines the mitigation required to reduce the impacts of the Scheme.



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
			The REAC (application document TR010029/APP/7.3) sets out all the mitigation measures proposed as part of the Scheme.
Brentwood Local Plan	<b>Essex CC</b> recommend that the next stage of design considers the traffic movements and pressures which may arise around junction 28 as a result of the new Brentwood Local Plan	The traffic modelling and the assessment of the Scheme has been completed, and this included information on and all known transport and land-use developments in the local area. The planned developments were identified in consultation with all local transport and planning authorities.	The TA (application document TR010029/APP/7.2) outlines the approach and study area for the traffic modelling in respect of the Scheme.
Construction compounds	<b>EA</b> – the Outline CEMP should address how the watercourses are to be protected during construction including from surface water run-off.	The Applicant has shared the WFD with the EA prior to the formal submission and further details can be found in the WFD assessment submitted in support of this application (application document TR010029/APP/6.7).	The Outline CEMP (application document TR010029/APP/7.2 and 7.3) has been prepared to address concerns raised by the EA.
	<b>EA</b> - Post construction, all hard surfacing should be removed, and biodiversity improved to the compound areas.	Noted	Following temporary possession, the Applicant will restore the land to the reasonable satisfaction of the landowner in accordance with the draft DCO (TR010029/APP/3.1).

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	<p><b>LB Havering</b> welcome further discussion regarding volume of vehicles and movements to and from site.</p> <p>Further information is required on the measures put in place to minimise impact of works on local environment and communities. Discussion regarding mitigation requested while Outline CEMP is being prepared.</p>	Noted	<p>The anticipated number of vehicular movements during construction is outlined within the materials and waste assessment in Chapter 12 of the ES (application document TR010029/APP/6.1).</p> <p>The assessment outlines that where possible, material is to be re-used on site.</p>
	Concern that the construction works may overlap with London Thames Crossing (LTC) construction works. <b>LB Havering</b> encourages the team to engage with LTC to establish the cumulative impacts of construction works	The team has been in close liaison with the LTC team to understand the relationship between the two projects, including the construction programme.	Engagement with LTC is ongoing as both schemes develop.
	<b>LB Havering</b> noted that the northern compound has the potential to impact "unknown deposits".	An archaeological watching brief has been carried out as	Chapter 10 of the ES covers geology and soils and contains the relevant information regarding unknown deposits. Geology and Soils (Chapter 10) Cultural Heritage



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	Appropriate assessment of the cultural heritage should be undertaken to support the DCO.	part of ground investigation works.	(Chapter 11) and Materials and Waste (Chapter 12) assessments are included the ES (application document TR010029.APP/6.1).
Construction management	<b>Essex CC</b> - route and programming of delivery and disposal of material and equipment to the site to be addressed to assess impact on wider Essex road network	Where material does need to be delivered to or taken away from the site, primary transport routes would be utilised in order to minimise impact on local road network.	The Materials and Waste assessment (Chapter 12) of the ES (application document TR010029.APP/6.1) details the amount of material to be delivered and deposited has been minimised where possible.
	<b>Essex CC</b> - Programme of construction work and traffic management to assess interaction with other construction in the wider area.	Where material does need to be delivered to or taken away from the site, primary transport routes would be utilised in order to minimise impact on local road network.	The Materials and Waste assessment (Chapter 12) of the ES (application document TR010029.APP/6.1) details the amount of material to be delivered and deposited has been minimised where possible.  The cumulative effects assessment (Chapter 15) within the ES (application document TR010029/APP/6.1).
Cycling connections	<b>Essex CC</b> would welcome discussions on linkages for cyclists between Brentwood and Havering	Noted	This falls outside of the Scheme. The Applicant is currently undertaking a feasibility study to look at the opportunities for a wider NMU strategy. This has involved consultation with Essex, Brentwood, LB Havering and TfL.



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
Drainage ponds/Access track	<p><b>EA</b> - Drainage pond to the north appears to be on the area of historic landfill and unauthorised waste. We understand GI's are not yet complete and we would caution against this location until the potential risks arising from ground investigations are known. We want to avoid the risk of mobilisation of contaminants from this area and ensure the risks can be managed through appropriate mitigation. Although there are no sensitive groundwater receptors, the watercourses present sensitive surface water receptors.</p>	<p>Noted – initial ground investigation works have been undertaken and informed the design.</p>	<p>This is referred to in Geology and Soils Chapter of the ES (application document TR010029/APP/6.1).</p>
	<p><b>EA</b> - Any further deterioration of the water quality will not be accepted. There should be an aim to improve the water quality. The design of the ponds also needs to</p>	<p>The Applicant engaged with EA on this matter and shared the WFD with the EA prior to the formal submission of the application.</p>	<p>Further details can be found in the WFD assessment submitted in support of this application (application document TR010029/APP/6.7).</p>

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	<p>be future proofed to the expected loading from increased usage taking into account climate change. Ponds and other SuDS measures also need to be maintained.</p>		
	<p><b>LB Havering</b> welcome the inclusion of drainage ponds. Highways England should engage with the EA and the relevant landowner should ensure maintenance</p>	<p>The Applicant has engaged with the EA on this topic.</p>	<p>The EA has been engaged on the design of the drainage ponds. This is detailed in the Road Drainage and the Water Environment is Chapter 8 in the ES (application document TR010029/APP/6.1).</p>
	<p><b>LB Havering</b> request clarification that Highways England would maintain the access tracks.</p>	<p>There are a number of access tracks throughout the application site and their purpose varies. The maintenance obligations will vary but in principal the relevant landowner will be responsible for maintenance with rights of access granted to Highways England.</p>	<p>The Land plans (application document TR010029/APP/2.2) submitted in support of this application show that the Applicant proposes to permanently acquire the land for the access tracks.</p>
<p>Duty to cooperate</p>	<p>Continued joint working between <b>Brentwood BC</b> and Highways England is required in order to</p>	<p>Noted</p>	<p>Noted and agreed</p>



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	<p>understand the implications of growth in the wider area on the strategic highways network.</p>		
Further analysis	<p><b>Essex CC</b> required further data/analysis to:</p> <ul style="list-style-type: none"> <li>• identify impact to Essex and surrounding area;</li> <li>• establish projected increase in traffic;</li> <li>• establish implications/sensitivity on transport movements across strategic network;</li> <li>• understand project delivery timescales and cumulative impacts;</li> <li>• understand sustainable transport provision for both construction and operation;</li> <li>• understand impact on Brook Street traffic;</li> <li>• understand implications on public footpath</li> </ul>	Noted	<p>An EIA has been undertaken for the Scheme which is reported in the ES (application document TR010029/APP/6.1) and a TA has also been undertaken (application TR010029/APP/7.4).</p>



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
Gas pipe diversion	<b>LB Havering</b> expect the team to engage with owners of Oak Farm burial ground regarding alignment of gas pipe diversion	Noted	Details of the engagement with the representatives of Oak Farm are contained Chapter 8 of this report.
	<b>LB Havering</b> expect team to continue engagement with representatives of Putwell Bridge Caravan Park regarding gas pipe diversion	Noted	Details of the engagement with the representatives of Putwell Bridge Caravan Park are contained within Chapter 8 of this report.
	<b>EA</b> consent required if gas main intersects with the Weald Brook or Ingrebourne rivers	Noted	The proposed diversion of the gas mains does not intersect either the Weald Brook or Ingrebourne River.
Green Belt	<b>LB Havering</b> - Highways England should take account of Local Plan Policy 27 Landscaping and Policy 29 Green Infrastructure when developing the proposed mitigation measures.	Noted	These policies are addressed both within the landscape and visual impact assessment provided in Chapter 9 of the ES (application document TR010029/APP/6.1) and within the Case for the Scheme (application document TR010029/APP/7.1) which support this DCO.
Impact on Brook Street	<b>Essex CC</b> - Strong likelihood that the queues and delays on Brook Street will worsen substantially.	The Applicant is pursuing wider improvements in the area from Brentwood to Romford, including an	The Applicant is working with Local Authorities to pursue wider improvements in the area from Brentwood to Romford, including an investigation into potential

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	<p>Need to examine a solution for the problem as part of the detailed design of the signal configuration to ideally be better than the do minimum and when the Scheme opens.</p> <p>Would encourage the team to be proactive in co-ordinating the discussions around the Brook Street issue.</p>	<p>investigation into potential improvements at the junction 28 Brook Street roundabout.</p>	<p>improvements at the junction 28 Brook Street Roundabout. These types of improvements would be funded and delivered separately from the Scheme.</p>
<p>Impacts to vehicular traffic and congestion</p>	<p><b>Brentwood BC</b> support the proposed route however it does not address wider congestion issues such as the congestion on Brook Street. It is acknowledged that Highways England have been working with Essex County Council to consider appropriate solutions to addressing congestion concerns along Brook Street.</p>	<p>The Applicant is pursuing wider improvements in the area from Brentwood to Romford, including an investigation into potential improvements at the junction 28 Brook Street roundabout.</p>	<p>The Applicant is working with Local Authorities to pursue wider improvements in the area from Brentwood to Romford, including an investigation into potential improvements at the junction 28 Brook Street Roundabout. These types of improvements would be funded and delivered separately from the Scheme.</p>



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	<p>It is noted that this Scheme has come forward at this stage in order to secure funding however <b>Brentwood BC</b> remain concerned by the likelihood of multiple and long-term disruption in the area as a result of numerous improvement projects.</p>	<p>The Applicant will seek to minimise disruption during construction.</p>	<p>Requirement 10 of the draft DCO (application document TR010029/APP/3.1) requires a Traffic management plan for the Scheme. Chapter 15 of the Environmental Statement (TR010029/APP/6.1) gives further details of the cumulative effects of this Scheme and other relevant developments.</p>
Ingrebourne River	<p><b>LB Havering</b> require further clarity on the implications of the redesign during the construction period. It is essential that the level of operation of the existing slip road is maintained during construction.</p>	<p>Noted.</p>	<p>The existing A12 off-slip road would be maintained as far as possible throughout construction. Should there be a need for any night-time closures, these would be well publicised in advance of any works taking place. This would be secured through requirement 10 of the DCO and the Outline CEMP (application document TR010029/APP/7.2).</p>
	<p><b>LB Havering</b> welcome the amendments to the water course and creation of wet grassland</p>	<p>Noted</p>	<p>Noted</p>
	<p><b>LB Havering</b> - Important that green infrastructure features in the landscape and ecological mitigation</p>	<p>Noted</p>	<p>An Outline LEMP is appended to Chapter 7 of the ES regarding biodiversity (application document TR010029/APP/6.1). Requirement 5 of the draft DCO (application</p>



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	<p>plan. LB Havering wish to be involved in the development of the landscape design and species choice.</p>		<p>document TR010029/APP/3.1) addresses landscaping.</p>
	<p>Works are supported. Consent will be required from the <b>EA</b>.</p>	<p>Noted</p>	<p>The Consents and Agreements Position Statement (application document TR010029/APP/3.3) details the approach to consents required to construct, operate and maintain the Scheme.</p>
<p>Ingrebourne River/Woodstock and Kenilworth Avenue</p>	<p><b>LB Havering</b> - Vital that vehicles exiting Woodstock Avenue and Kenilworth Avenue are not subject to an unacceptable diversion route in order to travel westbound.</p>	<p>Noted</p>	<p>The Outline CEMP (application document TR010029/APP/6.3) sets out the proposed measures to mitigate the impacts. Requirement 10 of the draft DCO (application document TR010029/APP/3.1) requires a Traffic management plan for the Scheme.</p>
<p>Interaction with NG apparatus</p>	<p><b>National Grid</b> - Where the promoter intends to acquire land, extinguish rights, or interfere with any of NGET's and NGG's apparatus, both will require appropriate protection and further discussion on the impact to its apparatus and rights.</p>	<p>Noted</p>	<p>Discussions have been had with NG regarding its apparatus. Protective provisions are included in Schedule 10 of the draft DCO (application document TR010029/APP/3.1).</p>

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Land Take at Oak Farm	Public Health England note there will be land take from Oak Farm resulting in permanent moderate adverse effects. The consultation document does not identify any mitigation measures. Require the Environmental Statement to identify all potential impacts and mitigations to address these issues	Noted	The People and Communities assessment provided in Chapter 13 of the ES (application document TR010029/APP/6.1) addresses the impacts to Oak Farm.
Loss of woodland	<b>FC</b> - not been made clear how much woodland is proposed to be removed, particularly with the addition of the gas main diversion.	Survey work was undertaken to identify ancient woodland, with consideration been given to the impacts.	The Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) outlines the mitigation required to reduce the impacts of the Scheme.  The REAC (application document TR010029/APP/7.3) sets out all the mitigation measures proposed as part of the Scheme.
	The area for mitigation is noted to include woodland planting. <b>FC</b> would appreciate further detail including hectarage of woodland to be planted	Survey work was undertaken to identify ancient woodland, with consideration been given to the impacts.	The Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) outlines the mitigation required to reduce the impacts of the Scheme.



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	and any associated planting plans.		The REAC (application document TR010029/APP/7.3) sets out all the mitigation measures proposed as part of the Scheme.
	<b>FC</b> - The loss of woodland trees should be included within the compensation package. Opportunities to strengthen and buffer existing woodland and provide connectivity should be explored	The Scheme would result in the loss of 3.6 ha of woodland.  The Preliminary Environmental Design for the Scheme includes 3.8 ha of native woodland planting. A number of factors have influenced the environmental design of the Scheme and focus of habitat creation, including requirements to mitigate and compensate for species and effects on locally designated sites, requirement to mitigate for visual impact, and land use and landowner requirements.	The Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) outlines the mitigation required to reduce the impacts of the Scheme.  The REAC (application document TR010029/APP/7.3) sets out all the mitigation measures proposed as part of the Scheme.  The Outline LEMP is included within the ES (Appendix 7.16 application document TR010029/APP/6.3).
	<b>FC</b> - Root protection zones must be considered	Noted	The Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) outlines the mitigation required to reduce the impacts of the Scheme.



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			The REAC (application document TR010029/APP/7.3) sets out all the mitigation measures proposed as part of the Scheme.
Mitigation Area	<p><b>LB Havering</b> - Impact on Great Crested Newt (GCN) and Bats is unclear. Therefore, need further discussion regarding appropriate mitigation</p>	Noted - discussions are ongoing with LPA's and Natural England	The Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) outlines the mitigation required to reduce the impacts of the Scheme.
	<p><b>LB Havering</b> would encourage the mitigation proposals to be intertwined</p>	Noted	Chapter 7 of ES (application document TR010029/APP/6.1) contains the assessment on Biodiversity and Chapter 9 of the ES (application document TR010029/APP/6.1) contains the assessment on Landscape.
	<p><b>LB Havering</b> - consideration required to facilitate temporary storage of clay whilst still ensuring the long term aims of mitigation for GCN and compensation at the SMI by managing the invasive Golden Rod. To be secured in the REAC.</p>	Noted	This will be covered by the REAC (application document TR010029/APP/7.3).

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
Proposed changes and newly identified impacts	<p><b>Brentwood BC</b> support the mitigation proposals and mitigation proposals for Weald Brook</p>	<p>Noted</p>	<p>N/A</p>
	<p><b>Brentwood BC</b> welcome the lowering of the loop road to reduce impact on openness of the Green Belt however the full impact on the Green Belt should be considered as part of the DCO.</p>	<p>The Applicant has considered the impact of the Scheme on green belt and openness and where possible, minimised its impact. This includes keeping the proposed loop road as low as possible and proposing screen planting around its perimeter to lessen visual impacts.</p>	<p>The Outline LEMP is included within the ES (application document TR010029/APP/6.3) which sets out the areas identified for appropriate mitigation. The Case for the Scheme (application document TR010029/APP/7.1) also provides an assessment of the Scheme against local and national Green Belt policy.</p>
	<p><b>Brentwood BC</b> will continue to engage and provide feedback regarding the environmental, traffic, and construction management impacts of the gas main diversion</p>	<p>Noted</p>	<p>Noted</p>
	<p><b>Brentwood BC</b> encourages Highways England to take all reasonable measures to protect all the veteran</p>	<p>The Applicant has identified all veteran trees within the DCO boundary and the vicinity of the Scheme. However, it has not been possible to retain two veteran</p>	<p>Further information on the reasons for this, and the compensatory measures proposed, are provided in the Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) and supporting appendices including the AIA report</p>



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	trees within the construction area.	trees. All reasonable measures will be taken to protect and retain the remaining veteran trees during the construction of the Scheme. For each veteran tree lost it is proposed to plant eight trees of a suitable native species.	(Appendix 7.7, application document TR010029/APP/6.3).
	<b>Brentwood BC</b> require further clarification is requested on the nature of the proposal for the access track at Wigley Bush Lane.	Noted	We are no longer progressing with this suggested amendment.
New woodland	<b>FC</b> would welcome the opportunity to discuss new woodland creation further and obtain more information on the proposals	Noted – however, no discussion has taken place yet.	Scheme impacts to woodland is outlined within Chapter 7 of the ES (application document TR010029/APP/6.1) relating to biodiversity.
Replacement gantry	<b>LB Havering</b> further information is requested as part of the Outline CEMP as to how the site will be accessed.	Noted	For consideration in the development of the Outline CEMP (application document TR010029/APP/7.2).



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	<p><b>LB Havering</b> request confirmation as to whether the modifications to the existing gantry on the southbound side of the M25 are still required.</p>	<p>Yes. The proposal is to replace existing signage to announce the new junction.</p>	<p>This would form part of the authorised development listed in Schedule 1 of the draft DCO (application document TR010029/APP/3.1).</p>
<p>Response Times</p>	<p>Changes not expected to affect <b>London Fire Brigade</b> however construction works have the potential to affect attendance times. LFB would welcome the opportunity to discuss planned closures as far in advance as possible.</p>	<p>Noted</p>	<p>The preparation of Traffic management plans is secured by requirement 10 of the draft DCO (application document TR010029/APP/3.1).</p>
<p>Scheme construction</p>	<p><b>Essex CC</b> - understanding of employee access, job numbers, modes of travel, sustainable access and road safety during construction to be addressed to minimise disruption to wider road network</p>	<p>Noted and the details available at the time of submission will be reported in the ES.</p>	<p>Details of the construction of the Scheme are available in chapter 2 of the ES (application document TR010029/APP/6.1).</p>
<p>Traffic forecasts</p>	<p>Essex CC are pleased to note that the latest traffic forecasts include LTC</p>	<p>Noted and where possible, consideration will be given</p>	<p>The TA (application document TR010029/APP/7.4) submitted in support of the DCO application sets out the</p>

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	<p>although there is concern that the forecast underestimates future traffic levels as it does not take enough consideration of future growth plans.</p> <p>It is recommended that further consideration should be given to the timescales for project delivery and the cumulative impacts with other major transport infrastructure projects (LTC, A13 widening, Fairglen interchange improvements and A127 route management)</p>	<p>minimise the impact of the Scheme during construction.</p>	<p>assumptions around modelling and takes account of future growth and development, depending on its certainty. The TA also looks at journey times and considers the impact of the Scheme on the wider road network, both during construction and operation.</p> <p>Engagement with other transport infrastructure projects is ongoing as the Scheme develops.</p>
Traffic management	<p>Essex CC Impact of traffic management during construction to assess impact on the wider network to be addressed</p>	<p>The proposed traffic management arrangements for the construction of the Scheme will aim, where possible, to minimise disruption. Construction of the Scheme will be subject to a traffic management plan that is also included as a requirement in the draft DCO</p>	<p>The Applicant is required to consult the relevant planning authority on the Traffic Management Plan under requirement 10 in the draft DCO (application document TR010029/APP/3.1).</p>



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
		(application document TR010029/APP/3.1).	
Use of existing access track	<b>LB Havering</b> - no comment as the location falls in Brentwood District Council	Noted	Noted
Veteran trees	<p><b>FC</b> as noted that the loss of two veteran trees will be unavoidable, we would like to see plans of how Highways England intends to compensate significantly their loss. We are also concerned about how works may impact on the remaining veterans and look forward to seeing what protective measures will be used to ensure they remain healthy. Of particular concern are:</p> <p>How Highways England will prevent compaction of the soils around the trees' root systems; How the ground water level will be maintained, especially to prevent stress</p>	<p>The Applicant has identified all veteran trees within the DCO boundary and the vicinity of the Scheme. However, it has not been possible to retain two veteran trees.</p> <p>All reasonable measures will be taken to protect and retain the remaining veteran trees during the construction of the Scheme. For each veteran tree lost it is proposed to plant eight trees of a suitable native species.</p>	<p>Further information on the reasons for this, and the compensatory measures proposed, are provided in the Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) and supporting appendices including the AIA report (Appendix 7.7, application document TR010029/APP/6.3). All reasonable measures will be taken to protect the remaining veteran trees and for each veteran tree lost, they will be replaced with eight trees each of suitable native species.</p>



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	caused by waterlogging or drought; and details of compensatory planting.		
Weald Brook	<b>LB Havering</b> welcome the amendments to the water course	Noted	Noted
	<b>EA</b> are supportive of channel re-alignment. Channel will need to be modelled to ensure no adverse impact on flood risk upstream and downstream.	Noted	Noted
	<b>EA</b> - Flood storage compensation to be provided on a level for level and volume for volume basis	Noted	Noted
Weald Brook/Veteran trees	<b>LB Havering</b> - Loss of 2 veteran trees is a concern. Should be compensated by veteranising younger trees, ideally within the site boundary or in Dagnam Park.	The Applicant has identified all veteran trees within the DCO boundary and the vicinity of the Scheme. The applicant will consult with the local authority in identifying the appropriate trees to be veteranised during detail design stage.	Further information on the reasons for this, and the compensatory measures proposed, are provided in the Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) and supporting appendices including the AIA report (Appendix 7.7, application document TR010029/APP/6.3). All reasonable measures will be taken to protect the remaining veteran trees and for each

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
		For each veteran tree lost it is proposed to plant eight trees of a suitable native species.	veteran tree lost, they will be replaced with eight trees each of suitable native species. Veteranisation of existing trees will be undertaken to provide continuity of dead-wood resource for invertebrates.
	<p><b>LB Havering</b> require further details requested on 2 veteran trees to be lost. Detail requested on their quality and how the Scheme impacts them to justify removal.</p>	The Applicant has identified all veteran trees within the DCO boundary and the vicinity of the Scheme.	An AIA is included as part of the biodiversity assessment in Chapter 7 of the ES. This outlines the need to remove the two veteran trees and details of the scheme development which lead to this option. This is supported by the Case for the Scheme (application document TR010029/APP/7.1) which supports the DCO.
	<p><b>LB Havering</b> would welcome discussions regarding the protective measures to be implemented to 8 other veteran trees.</p>	Noted	<p>Detail of the protective measures to be implemented to protect the other identified veteran trees within the DCO boundary is included within the Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) and within Chapter 9 (application document TR010029/APP/6.1) which contains the assessment on Landscape.</p> <p>The mitigation measures are secured via the REAC (application document TR010029/APP/7.3).</p>
Working in proximity to assets	<b>National Grid</b> - It is essential that safety clearances are met during	Noted	Safety clearances are proposed to be met and protective provision are included in



Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	the construction works and that access to our apparatus is always maintained. For the revised proposals, we refer to the potential temporary and/or permanent impacts of the river mitigation works, drainage ponds and proposed satellite compound on our assets.		Schedule 10 of the draft DCO (application document TR010029/APP/3.1).



# Consultation Report Annex F6

Supplementary Consultation Tabulated responses

In favour of Scheme		
Summary of consultee response	Additional comments	How the Application has had regard to responses received (section 49)
		Requirement 4 of the DCO (application document TR010029/3.1).
General	“Would it not be more cost effective to properly manage the traffic at Brook Street roundabout/M25 as it stands? Has this actually been evaluated? Please provide details.	A full options analysis was undertaken and further details can be found in Chapter 3 of the ES (application document TR010029/APP/6.1).
General	I found diagrams unhelpful as there were no name places, no directions e.g. to Brentwood, to Romford, no significant buildings noted e.g. hotels - Holiday Inn - schools e.g. St Peters	Noted

### F6 Tabulated summary of responses from section 47 consultees

In favour of Scheme		
Summary of consultee response	Additional comments	How the Application has had regard to responses received (section 49)
Happy with proposed area/scheme - acceptable/reasonable	I consider the scheme to be essential for the area. The proposal addresses traffic flow from both the A12 East and A12 West finalising that the flow of traffic onto the anti-clockwise route of the M25 is greatly improved.	Noted
Weald Brook	No problems/happy with proposals	Noted
Weald Brook	Again, this is important and welcomed.	Noted
Weald Brook	Necessary change - acceptable/sensible	Noted
Weald Brook	Trust land will be returned to its original state afterwards.	Any land returned to a landowner will be done so to their reasonable satisfaction and in line with the DCO (application document TR010029/APP/3.1).
Ingrebourne River and Ingrebourne Valley mitigation works	Good, necessary and rational	Noted
Location of the drainage ponds and access tracks	Acceptable and sensible, assuming they do their job and don't add to flooding potential, no problem.	Noted. The Drainage strategy (application document TR010029/APP/6.8) submitted in support of the application outlines the drainage system proposed for the Scheme. Flood compensation areas are proposed as part of the Scheme, as shown on the Works plans (application document TR010029/APP/2.3).



<b>In favour of Scheme</b>		
<b>Summary of consultee response</b>	<b>Additional comments</b>	<b>How the Application has had regard to responses received (section 49)</b>
Location of replacement gantry	Necessary/rational – agreed	Noted
Location of replacement gantry	Clearly this will be necessary with the introduction of the anti-clockwise loop and the need to keep drivers informed.	Noted. Signs for road users will be part of the Scheme and will be developed as part of the design process.
Potential use of existing access track	Good plan - this would cause less impact to local traffic.	Noted but it has been decided that this part of the Scheme is no longer required.
General	I have looked online, and from what I've found I will support improvements.	Noted
<b>Scheme is inadequate</b>		
<b>Summary of consultee response</b>	<b>Additional comments</b>	<b>How the Application has had regard to responses received (section 49)</b>
Scheme is inadequate	Congestion issues not resolved.	One of the Scheme objectives is to increase capacity and reduce congestion at the junction and the Scheme is considered to achieve this.
Scheme is inadequate	The bend in the road look too tight and will slow the traffic down too much	The Scheme has been designed in accordance with current design standards. Appropriate signage is also proposed to advise drivers of the bend in the road.



In favour of Scheme		
Summary of consultee response	Additional comments	How the Application has had regard to responses received (section 49)
Noise and pollution	The impact on the area is increase in traffic, road noise and pollution for the Area. The noise will double as a result for people living on Colchester road. We will have pay extra to change or windows doors and sound insulation. Who will pick up the bill for this?	An Outline CEMP has been submitted in support of the application and sets out the proposed mitigation commitments in section 6 of the Register of Environmental Actions and Commitments. The ES provides an assessment of the environmental impacts of the Scheme and proposes mitigation. Requirement 5 of the DCO ensures these mitigation measures are secured.
Weald Brook	Course of brook should not be altered and difficult to judge	Sections of the Weald Brook are being altered to mitigate the impact of the Scheme and in line with discussions with the Environment Agency (EA).
Weald Brook	Copies of the flood risk assessment should be provided on the plans so that one can clearly see the extent of the damage likely to be caused in a 100- year flood. The natural course of Weald Brook should not be altered.	The Flood risk assessment (application document TR010029/APP/6.6) outlines the mitigation measures proposed as part of the Scheme, including the flood plain compensation areas. The Applicant submitted the flood modelling data for EA review and confirmed that the Scheme has been designed to attenuate storm water on site up to 1 in 100 (1%) annual probability rainfall event including an allowance for climate change.
High-pressure gas mains diversion	Don't fully understand impact/map provided	Noted. All consultation materials have been available in a variety of formats and adhere to accessibility standards.



In favour of Scheme		
Summary of consultee response	Additional comments	How the Application has had regard to responses received (section 49)
High-pressure gas mains diversion	Where is the current gas main shown on a plan?"	The location of the proposed gas pipe diversion is indicated on the Works plans (application document TR010029/APP/2.3).
High-pressure gas mains diversion	Provide details of any above ground works likely to be visible on completion.	No above ground structures are proposed in connection with the gas diversion.
Proposed construction and satellite compound	The site compound proposed location will cause greater strain on the existing inadequate road requiring HGV's arriving via the M25 to use a small turning facility which can barely cope with peak traffic flows. How will the traffic management be enforced?	A traffic management plan will be produced and is secured by requirement 10 of the draft DCO (application number TR010029/APP/3.1).
Proposed construction and satellite compound	Noise will be a big issue for people living A12. What is the proposal to protect us from this noise?"	Chapter 6 of the ES (application document TR010029/APP/6.1) reports the results of Noise and Vibration effects arising from the Scheme. The measures to mitigate and minimise these effects are set out in the Outline CEMP (application document TR010029/APP/7.2) and the Register of Actions and Commitments (application document TR010029/APP/7.3).
Ingrebourne River and Ingrebourne Valley mitigation works	River should not be realigned – may lead to flooding etc	The course is being altered to mitigate the impact of the Scheme and in line with discussions with the EA. The Water Framework Directive (application document TR010029/APP/6.7) submitted in support



In favour of Scheme		
Summary of consultee response	Additional comments	How the Application has had regard to responses received (section 49)
		of the application sets out these mitigation works proposed within the Ingrebourne River and Weald Brook. The FRA (application document TR010029/APP/6.6) submitted in support of the application sets out the assessment of flood risk. Flood compensation areas are proposed as part of the Scheme as shown on the Works plans (application document TR010029/APP/2.3).
Ingrebourne River and Ingrebourne Valley mitigation works	Concern about potential wider area of flooding in locality after prolonged, heavy rain.”	The FRA (application document TR010029/APP/6.6) submitted in support of the application sets out the assessment of flood risk. Flood compensation areas are proposed as part of the Scheme as shown on the Works plans (application document TR010029/APP/2.3).
Location of the drainage ponds and access tracks	History of flooding issues – unresolved	The Applicant submitted the flood modelling data for EA review and confirmed that the Scheme has been designed to a minimum 1 in 100 year. The FRA (application document TR010029/APP/6,6) submitted in support of the application sets out the assessment of flood and the Scheme will not make the existing situation worse. The drainage system has been developed in line with the current planning policy requirements and it is described in detail within the



In favour of Scheme		
Summary of consultee response	Additional comments	How the Application has had regard to responses received (section 49)
		Drainage strategy report (application document TR010029/APP/6.8).
Location of the drainage ponds and access tracks	Currently, we have extensive flooding on the east side of Brook Street roundabout (between the westbound exit slip road as it joins Brook Street roundabout and the exit slip road with Brook Street.) If the Highways Agency / TFL / Essex County Council cannot currently fix this small problem, what confidence can we have that this scheme will not adversely affect the surrounding areas?"	The drainage system has been developed in line with the current planning policy requirements and it is described in detail within the Drainage strategy report (application document TR010029/APP/6.8). The FRA (application document TR010029/APP/6.6) submitted in support of the application sets out the assessment of flood risk. Flood compensation areas are proposed as part of the Scheme as shown on the Works plans (application document TR010029/APP/2.3) and the Scheme would not make the existing situation worse.
Location of replacement gantry	Should not be relocated if tree felling/destruction of habitat required. If this involves further tree felling and destruction of nature habitats etc then it should not be relocated."	The existing gantry requires relocation to avoid impact on Maylands Golf Course. Any removal of trees connected with the relocation of the new gantry are considered in the provision of appropriate mitigation as set out in the REAC. The proposed location has been selected to provide the least environmental impact.
Potential use of existing access track	If this means more traffic will use Weald Road the response is "Don't do it". The traffic at School Times is horrendous.	Noted but it has been decided that this part of the Scheme is no longer required.



In favour of Scheme		
Summary of consultee response	Additional comments	How the Application has had regard to responses received (section 49)
Potential use of existing access track	Negative effect on surrounding area/roads - farms, businesses etc. Assuming this is access past French's Farm I have concerns that disruption should be minimal for owners, livestock & wildlife. Wild deer are often seen in this field.	Noted but it has been decided that this part of the Scheme is no longer required.
General	All of my concerns are for the natural environment, wildlife and trees. Where veteran trees are facing impact, we can only trust that you will honour the commitment to protect them during construction works, not just pay lip service to this.	<p>The Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1) outlines the ecology assessment of the Scheme and the mitigation measures proposed. Also an Outline LEMP (Appendix 7.16 – application document TR010029/APP/6.3) sets out the long term monitoring and maintenance of the landscape and ecological areas.</p> <p>An Outline CEMP (application document TR010029/APP/7.2) has been developed and will be adopted into a CEMP for all construction operations to protect retained veteran trees. Measures regarding the protection of retained veteran trees and actions to be taken to limit the adverse impacts of construction and compensate for veteran tree loss are also provided as environmental commitments in the REAC (application document TR010029/APP/7.3) and has been developed in discussion with LPAs and Natural England. Implementation of the CEMP is secured by</p>