

Our ref: HE551519-ATK-GEN-XX-LN-ZM-000009
Your ref: TR010029

The Planning Inspectorate
National Infrastructure Planning
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M25 junction 28 Project Team
Regional Investment Programme
(South East)
Highways England
Bridge House
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By email to:
m25junction28@planninginspectorate.gov.uk

17 March 2021

Dear Sirs,

M25 junction 28 improvement scheme

Planning Inspectorate reference: TR010029

Highways England (the Applicant) Deadline 4 submission – 17 March 2021

Further to the Examining Authority's (ExA's) Rule 8 letter dated 13 January 2021, please find enclosed with this letter the following documents, which have been requested from the Applicant by the ExA at Deadline 4 (17 March 2021):

1. Written Submission of the Applicant's case put orally at the Compulsory Acquisition Hearing 1 (CAH1) held on 1 March 2021 **(TR010029/EXAM/9.53)**.
2. Written Submission of the Applicant's case put orally at the Open Floor Hearing (OFH) held on 1 March 2021 **(TR010029/EXAM/9.54)**.
3. Written Submission of the Applicant's case put orally at Issue Specific Hearing 1 (ISH1) on Environmental matters held on 3 and 4 March 2021 **(TR010029/EXAM/9.55)**.
4. Written Submission of the Applicant's case put orally at Issue Specific Hearing 2 (ISH2) on the draft DCO held on 5 March 2021 **(TR010029/EXAM/9.56)**.
5. The Applicant's comments on London Borough of Havering's Deadline 3b submission (REP3B-006) **(TR010029/EXAM/9.49)**.
6. The Applicant's comments on Transport for London's Deadline 3b submission (REP3B-008) **(TR010029/EXAM/9.50)**.
7. The Applicant's comments on Savills on behalf of Gardens of Peace Muslim Cemetery's Deadline 3b submission (REP3B-007) **(TR010029/EXAM/9.51)**

8. The Applicant's comments on Addleshaw Goddard LLP on behalf of Network Rail Infrastructure Limited's further representation (AS-034) and Response to the Examining Authority's Written Questions (AS-035) **(TR010029/EXAM/9.67)**
9. The Applicant's response to action points from Compulsory Acquisition Hearing 1 (CAH1) held on 1 March 2021 **(TR010029/EXAM/9.57)** are provided in this document. To support the Applicant's response to action points from the CAH1, the following documents are also submitted:
 - An updated Compulsory Acquisition Schedule that sets out the progress of negotiations for compulsory acquisition in response to CAH action point 1. **(TR010029/APP/9.19(2))** (Clean version) and **(TR010029/EXAM/9.31(1))** (Tracked version). This is also a requirement in the Rule 8 letter at Deadline 4.
 - An addendum to the Book of Reference, a Schedule of Changes and update to sheet 1 of the Land Plans to clarify various land ownership matters in response to CAH action points 3, 9 and 10 respectively **(TR010029/EXAM/9.58)**.
 - A plan that overlays plot 1/8 and the burial plots in response to CAH action point 5 **(TR010029/EXAM/9.59)**.
10. The Applicant's response to action points from Issue Specific Hearing 1 (ISH1) held on 3 and 4 March 2021 **(TR010029/EXAM/9.60)** are provided in this document. To support the Applicant's response to action points from the ISH1, the following documents are submitted:
 - An Outline Traffic Management Plan in response to ISH1 action point 3 **(TR010029/EXAM/9.52)**.
 - Drawings of the area around Grove Farm dwellings at a larger scale in response to ISH1 action point 5 **(TR010029/EXAM/9.61)**.
 - The road to good design guide accompanied by an explanation of how its principles have been adhered to in the development of the Scheme in response to ISH1 action point 8 **(TR010029/EXAM/9.62)**.
 - A revised carbon budget assessment with calculations of the Scheme's contributions to the third and fourth Carbon Budgets in response to ISH1 action point 9 **(TR010029/EXAM/9.63)**.
 - A set of revised engineering drawings including section D-D and an extended version of section E-E to cover Grove Farm in response to ISH1 action point 15 **(TR010029/EXAM/9.65)**.
11. The Applicant's response to action points from the Issue Specific Hearing 2 (ISH2) held on 5 March 2021 **(TR010029/EXAM/9.66)**.

12. An updated draft Development Consent Order (**TR010029/APP/3.1(3)**) (clean version) and (**TR010029/EXAM/9.32(2)**) (tracked version).
13. A schedule of changes to the draft Development Consent Order (**TR010029/EXAM/9.28(2)**).
14. An updated Statement of Common Ground with the London Borough of Havering (**TR010029/EXAM/9.8(1)**).
15. An updated Statement of Commonality (**TR010029/EXAM/9.18(3)**).
16. An updated Guide to the Application (**TR010029/EXAM/9.1(4)**)
17. The Applicant's response to Savills' submission of further information to the Gardens of Peace Muslim Cemetery's Written Representation (AS-033) (**TR010029/EXAM/9.68**)

DEFRA and the Forestry Commission

Regarding the interaction of the Scheme with Crown Land, on 25 February 2021 and again on 1 March 2021, Forestry England confirmed on behalf of the Forestry Commission and DEFRA that neither of these parties consider that they have rights over plots 4/5, 4/6 and 4/7.

The Applicant is seeking a formal letter from the Forestry Commission for submission to the ExA as evidence. In the meantime, the parties will be removed from the Book of Reference. This is shown in the Book of Reference Addendum (**TR010029/EXAM/9.58**) submitted at Deadline 4. The Applicant does not consider a Statement of Common Ground is required as a result of these discussions and therefore it is now proposed that document reference REP1-013 is no longer needed to be updated as part of the examination.

Submission of suggested locations / sites for the ASI

The Applicant has reviewed the suggested locations to visit in the accompanied site inspection (ASI) received from Interested Parties at Deadline 3a. All of the locations suggested by Interested Parties were incorporated into the draft ASI itinerary submitted at Deadline 3a (REP3A-014) by the Applicant.

The Applicant notes that in the Rule 8 letter, there are some discrepancies in relation to the dates for the ASI. It is the Applicant's understanding that the ASI is on 19 May 2021, but Annex A appears to have some discrepancies. The Applicant would like to clarify if the ExA would like the Applicant to submit a final version of the ASI and if so at what deadline.

I should be grateful if you would acknowledge safe receipt of this letter and arrange for a copy of it and its enclosures to be placed before the ExA.

Yours faithfully,



Thomas Selby
Project Manager

