

**M25 junction 28 improvement scheme**

**TR010029**

**9.15 Statement of Common Ground with  
Natural England**

Rule 8(1)(e)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

Volume 9

May 2021

# Infrastructure Planning

## Planning Act 2008

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

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

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#### 9.15 STATEMENT OF COMMON GROUND WITH NATURAL ENGLAND

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<b>Regulation Number:</b>	Rule 8(1)(e)
<b>Planning Inspectorate Scheme Reference:</b>	TR010029
<b>Application Document Reference:</b>	TR010029/EXAM/9.15
<b>Author:</b>	M25 junction 28 scheme project Team, Highways England

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
1	20 May 2021	Deadline 7
0	21 January 2021	Deadline 1

## **STATEMENT OF COMMON GROUND**

**This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Natural England.**

**Signed**

██████████

**Project Manager  
on behalf of Highways England**

**Date: 19/05/2021**

**Signed**

██████████

**on behalf of Natural England**

**Date: 14.05.2021**

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# 1. Introduction

## 1.1 Purpose of this document

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

## 1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Highways England as the Applicant and (2) Natural England.
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations of the Highways Agency, including in respect of the Application, to be conferred upon or assumed by Highways England.
- 1.2.3 Natural England is the government’s adviser for the natural environment in England, helping to protect England’s nature and landscapes for people to enjoy and for the services they provide.

## 1.3 Terminology

- 1.3.1 In the tables in the Issues chapter of this SoCG, “Not Agreed” indicates a final position, and “Under discussion” where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. “Agreed” indicates where the issue has been resolved.

- 1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to Natural England and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Natural England.

## 2. Record of engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and Natural England in relation to the Application is outlined in Table 2.1.

2.1.2 Copies of key meeting minutes and other correspondence received from NE can be found in Appendix A. Where included in Appendix A, this is indicated in Table 2.1.

**Table 2.1: Record of engagement**

Date	Form of correspondence	Key topics discussed and key outcomes
03.11.17	Email	Email from Highways England to inform Natural England about the NSIP scheme and request a preliminary meeting and to discuss results of HRA screening.
07.12.17	Email	Response email from Natural England, request to complete Natural England discretionary advice service (DAS) application for pre-application stage.
19.02.19	Email	Response email from Natural England to statutory consultation and review of the Preliminary Environmental Information Report.
31.05.19	Email	Email to Natural England with DAS application and request of services in relation to scheme.
20.11.19	Meeting (office)	Meeting at Natural England office. Introduction to scheme and survey and assessment work to date, highlighting key potential impacts and mitigation. See Appendix A.1.
20.11.19	Email	Email to Natural England, HRA screening document issued for comment. See Appendix A.2.
21.11.19	Email	Email to Natural England, draft meeting minutes (20.11.19) issued. Meeting minutes in Appendix A.1.
04.12.19	Email	Email from Natural England regarding support for reviewing draft licence applications as part of DAS agreement for NSIPs.
09.12.19	Email	Email from Natural England, response to HRA screening with two comments. See Appendix A.2.
10.12.19	Email	Email from Highways England to Natural England, response to comments on HRA screening document. See Appendix A.2.
18.12.19	Email	Email from Natural England, final response to close out comments on HRA screening document. See Appendix A.2.
28.02.20	Email	Email from Highways England to Natural England regarding valuation of veteran trees. See Appendix A.3.

Date	Form of correspondence	Key topics discussed and key outcomes
04.03.20	Email	Response from Natural England regarding agreement on valuation of veteran trees. See Appendix A.3.
08.04.20	Email	Email from Highways England to Natural England, issuing draft biodiversity chapter of Environmental Statement (ES) and appendices. See Appendix A.4.
21.04.20	Email	Email from Highways England issuing draft DCO documents including dDCO, Register of Environmental Actions and Commitments (REAC), Outline CEMP and Outline LEMP, preliminary environmental design and plans. See Appendix A.5.
30.04.20	Email	Response from Natural England on draft biodiversity chapter, appendices and preliminary environmental design plans. See Appendix A.4.
13.05.20	Telephone call	To discuss compensation for woodland loss and veteran trees following comments from Natural England.
19.05.20	Email	Response from Natural England on the draft DCO documents/plans. See Appendix A.5.
05.06.20	Email	Email to Natural England with update on PINs application and response to comments received on the draft biodiversity chapter. Invitation to discuss comments further during a meeting. See Appendix A.6.
13.08.20	Meeting (virtual)	Meeting with Highways England, Natural England and LPA to discuss the preliminary environmental design: context, layout and influences. Meeting invitation included an agenda with detailed information and a plan to discuss during the meeting.  No further comments raised regarding the design during the meeting. See Appendix A.7.
24.08.20	Email	Meeting minutes (27.07.20) issued to Natural England and LPA. See Appendix A.7.
02.10.20	Email	Email to NE to issue draft great crested newt licence for review and comment.
09.04.21	Email	Email to NE to issue updated draft great crested newt licence for review and comment along with responses to Further Information Request from Natural England
05.05.21	Email	Email from NE to issue Letter of No Impediment with regards to the draft great crested newt licence
13.05.21	Meeting (virtual)	Meeting with NE to discuss the Scheme changes 5-7, materiality and conclusions of the Environmental Statement.



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

### 3. Issues

3.1.1 Table 3.1 has been discussed with Natural England and this SoCG is version 1 at 14 May 2021.

**Table 3.1: Table of issues and matters to be agreed – Version as at 14 May 2021**

SoCG reference number	Document reference	Relevant issue	Position as regards to agreement Highways England and Natural England and reasons for any difference in views	Matters to be addressed/agreed
<b>1.0 Habitats Regulations Assessment (HRA)</b>				
1.1	HRA No Significant Effects Report ( <u>APP-093</u> ),	<p>Highways England have produced an HRA No Significant Effects Report.</p> <p>Highways England considered potential impacts to European Sites taking into account potential effects relating to air quality along the affected road network and potential effects relating to water quality downstream.</p> <p>Highways England concluded there are no likely significant effects on any European Sites as a result of the Scheme.</p> <p>Highways England submitted the HRA to Natural England for review and the comments were addressed. No outstanding issues (see Appendix A.2).</p>	Agreed	None
<b>2.0 Environmental Statement – biodiversity (Chapter 7)</b>				
2.1	Environmental Statement, Chapter 7 (Biodiversity), Section 7.1 to 7.6. ( <u>APP-029</u> )	<p>Assessment and survey methodology:</p> <p>Highways England assessment of effects on important biodiversity resources has been prepared in accordance with good practice guidance for ecological impact assessment of road schemes including the Design Manual for Roads and Bridges (DMRB) Volume 10, Section 4, relating to Environmental Design and Management, DMRB Volume 11, Section 3, Part 4 relating to Ecology and Nature Conservation, IAN 130/10</p>	Agreed	None

SoCG reference number	Document reference	Relevant issue	Position as regards to agreement Highways England and Natural England and reasons for any difference in views	Matters to be addressed/agreed
		<p>Ecology and Nature Conservation: Criteria for Impact Assessment, and the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment.</p> <p>Desk based and field surveys follow standard guidelines for habitats and species. Assumptions and limitations to surveys are set out clearly. Survey limitations have not affected the conclusions of the assessment and mitigation proposals take these limitations into account adequately.</p> <p>Natural England are aware that, due to access restrictions in 2019, additional surveys to check for roosting bats in trees were carried out in 2020 to supplement the survey results included in the assessment.</p>		
2.2	Environmental Statement, Chapter 7 (Biodiversity), Table 7.14. (APP-029)	<p>Valuation of biodiversity resources:</p> <p>The nature conservation value of the biodiversity resources has been appropriately assigned taking into account the baseline information and following the Highways England guidance in IAN 130/10.</p> <p>The value of the veteran tree resource was agreed between Highways England and Natural England as this deviates from the guidance in IAN 130/10 (see Appendix A.3).</p>	Agreed	None
2.3	Environmental Statement, Figure 2, Preliminary Environmental Design (APP-039) Environmental Statement, Chapter 7	<p>Mitigation and compensation – Preliminary Environmental Design:</p> <p>The outline design of the Scheme is set out on the Preliminary Environmental Design drawing. This shows layout and design of habitats which will be created or reinstated. Further detail of specific measures for species are set out in Section 7.9.</p> <p>There will be unavoidable temporary and permanent loss of habitat as a result of construction of the Scheme and associated developments. The design of habitat reinstatement and creation within the land temporarily affected has been led by the need to</p>	Agreed	None

SoCG reference number	Document reference	Relevant issue	Position as regards to agreement Highways England and Natural England and reasons for any difference in views	Matters to be addressed/agreed
	(Biodiversity), Section 7.9. (APP-029)	<p>mitigate and compensate for the potential impacts of the Scheme on important biodiversity resources including Ingrebourne Valley Site of Metropolitan Importance for Nature Conservation (SMI), Ingrebourne River, Weald Brook and priority species, and to integrate with the mitigation required for landscape and visual impacts. The design takes into account the context/location of the Scheme and design constraints, whilst delivering appropriate mitigation for Ingrebourne Valley SMI, river habitats and species.</p> <p>Following comments from Natural England prior to submission, the biodiversity chapter was updated to include information detailing the context of the design (paragraphs 7.9.7 to 7.9.9). In addition to this, Natural England queried whether additional woodland planting could take place. The response to this query, context of the design, design development and decision on design were shared and discussed in a meeting between Highways England, Natural England and the LPA on 13.08.2020 (see Appendix A.7).</p>		
2.4	Environmental Statement, Chapter 7 (Biodiversity), Section 7.9, paragraphs 7.9.21 to 7.9.28. (APP-029)	<p>Mitigation and compensation – veteran trees: The proposals for planting and the retention and provision of dead wood resources as part of the design provide long-term continuity of deadwood resources for invertebrates.</p> <p>Following comments from Natural England, the ratio of standard size tree planting specifically for the loss of two veteran trees was increased to eight trees for every tree lost (total of 16 trees to be planted).</p>	Agreed	None
2.5	Environmental Statement, Chapter 7 (Biodiversity), Section 7.9,	<p>Mitigation and compensation – priority and protected species: Measures to avoid and reduce effects on priority and protected species, as described in Section 7.9 (paragraphs 7.9.33 to 7.9.67) are appropriate to the potential impacts of the Scheme.</p>	Agreed	None

SoCG reference number	Document reference	Relevant issue	Position as regards to agreement Highways England and Natural England and reasons for any difference in views	Matters to be addressed/agreed
	paragraphs 7.9.33 to 7.9.67. (APP-029)	NB: a draft great crested newt licence has been submitted to Natural England for review, see issue 3.1 below.		
2.6	Environmental Statement, Chapter 7 (Biodiversity), Section 7.10 and 7.14. (APP-029)	<b>Assessment of effects:</b> The potential ecological impacts of the Scheme have been assessed following appropriate methodologies. Impacts to designated sites, habitats and species within the study areas have been characterised and significant residual effects have been identified and stated clearly in the assessment. The mitigation and compensation proposals have taken into consideration the requirements of the NN NPS, by enhancing existing habitats, creating new habitats and minimising habitat fragmentation.	Agreed	None
<b>3.0 Protected species licences</b>				
3.1	Letter of No Impediment issued 05.05.21	Based on the survey information and assessment, a licence will be required for construction works which affect the following species: great crested newt. A draft great crested newt licence has been prepared and submitted to Natural England for review. This draft was revised in relation to a Further Information Request from Natural England and changes to the proposed Scheme, including proposed Change 7. A Letter of No Impediment was issued by Natural England on 05.05.21.	Agreed	None.
<b>4.0 Outline Landscape and Ecology Management and Monitoring Plan (LEMP)</b>				

SoCG reference number	Document reference	Relevant issue	Position as regards to agreement Highways England and Natural England and reasons for any difference in views	Matters to be addressed/agreed
4.1	Outline LEMP (APP-072)	The Outline LEMP sets out the aims and objectives for creation and long-term management of new landscape and ecology features within land permanently acquired the Scheme, and targets for the desired long-term condition of features. The management aims and objectives are suitable and appropriate to the mitigation and compensation required for important biodiversity resources set out in the biodiversity assessment.	Agreed	None
<b>5.0 Register of Environmental Actions and Commitments (REAC)</b>				
5.1	REAC (APP-097)	All the measures to avoid, mitigate and compensate for impacts to biodiversity resources described in the biodiversity assessment (Chapter 7) have been transferred to the REAC.	Agreed	None
<b>6.0 draft Development Consent Order (dDCO)</b>				
6.1	dDCO (APP-015)	The dDCO sets includes requirements which secure delivery of the measures set out in the biodiversity assessment as follows: <ul style="list-style-type: none"> <li>- Requirement 4 which secures the measures set out in the REAC</li> <li>- Requirement 5 which secures the production of a final LEMP</li> <li>- Requirement 7 which secures measures to protect legally protected species</li> </ul>	Agreed	None
<b>7.0 Proposed Changes 5-7</b>				
7.1	Changes 5-7 Report (REP6-022)	Proposed Changes 5-7 do not result in any changes to the effects of the Scheme on biodiversity resources as set out in the Environmental Statement (APP-029).	Agreed	None

# Appendices

# Appendix A. Key correspondence

## A.1 Meeting Minutes (20.11.2019)



### Meeting Notes

<b>Project:</b>	M25 J28		
<b>Subject:</b>	Meeting with Natural England to introduce the Scheme		
<b>Meeting place:</b>	Natural England office, [REDACTED]	<b>Meeting no:</b>	1
<b>Date and time:</b>	20/11/2019 at 11:00 am	<b>Minutes by:</b>	[REDACTED] (Atkins)
<b>Present:</b>	[REDACTED]	<b>Representing:</b>	Atkins Atkins Natural England

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
1.	Scheme introduction: [REDACTED] provided an introduction to the scheme, including overview of design, key ecological features, overall mitigation and compensation strategy and the project programme (DCO submission date etc)	n/a	n/a
2.	Bat surveys: [REDACTED] explained about limitations to bat surveys which were planned to be carried out in 2019 due to site access restrictions relating to safety.	n/a	n/a
3.	Veteran trees – two veteran trees to be lost to the scheme, loss of a further two has been avoided with re-design. [REDACTED] said that the statement relating to the unavoidable loss and retention of other veteran trees will be made available to Natural England.	November/ December 2019	Atkins
4.	It was agreed that the following information would be sent to Natural England:	See below	

**Next meeting:** TBC

**Distribution:**

**Date issued:**

**File Ref:**

**NOTE TO RECIPIENTS:**

These meeting notes record Atkins understanding of the meeting and intended actions arising therefrom. Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.

Contains sensitive information

M25 J28 ecology meeting with NE 20 Nov 2019 DRAFT\_1

1





Member of the SNC-Lavalin Group

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
5.	- HRA screening report to be provided for Natural England to respond to.	This week	Atkins
6.	- Copies of survey reports to allow Natural England to review the methodologies and scope as Atkins have not previously been able to liaise with Natural England on this	When updated reports available November/ December 2019	Atkins
7.	- Draft great crested newt licence application for assessment  ■■■ to investigate process for getting draft licence reviewed within Natural England and report back to Atkins.	Likely in new year (January 2020)  Next week	Atkins  ■■■
8.	- Following recent and on-going survey work, Atkins will update Natural England on whether other draft species licences will be produced and require assessment (badger and bats)	November / December 2019	Atkins
9.	- Contact details for LPA ecologist and Environment Agency	This week	Atkins
10.	■■■ asked if biodiversity accounting would be completed for the scheme, and said Natural England encourage use of accounting for schemes.  ■■■ explained that biodiversity accounting (such as with the Defra 2.0 metric) is not being carried out at this stage as this is an NSIP scheme with no requirement to present this information.  ■■■ shared that in discussion with the LPA ecologist, it was acknowledged that if biodiversity accounting was used, due to the overall loss of habitat to the road creation, there may be a deficit in score. It was agreed with the LPA ecologist that the aims for habitat improvements and management should be for the best ecological design for the site, rather than design being led by habitats which result in the highest scores. LPA ecologist supported this approach to ensure the scheme delivers quality not quantity of habitats.  <i>Post meeting note: the Environmental Statement will provide calculations of habitat loss and gains as hectares in a tabular format.</i>	None at present	n/a
11.	From the overview of the scheme given by Atkins during the meeting, ■■■ did not identify any significant 'red flags' to the scheme, but it was recognised there was still more work to do and detailed information to be provided to Natural England.	n/a	n/a

Contains sensitive information

M25 J28 ecology meeting with NE 20 Nov 2019 DRAFT\_1

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## A.2 Email (18.12.2019) - HRA

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**From:** [REDACTED]@naturalengland.org.uk>  
**Sent:** 18 December 2019 10:41  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: M25 J28 - HRA

Hi all,

Thank you for accepting the comments I provided on the HRA.

I can confirm that at the distances you have stipulated there should be no LSE to Epping Forest as a result of changes to air quality. The approach you've outlined is suitable, as you've said, I would recommend including the rationale within the scoping document. I double checked our stance on this with other junction improvement schemes and Natural England take the position that junction changes don't generate new motor movements, and should improve congestion and idling, which results in the net benefit effect I referred to in my previous email.

If the N2k sites were much closer to the changes, then it might be necessary to see more data or modelling, but in this case you are correct in scoping out due to the large distance between the development and Epping Forest.

Many thanks,  
[REDACTED] / Lead Adviser  
Thames Team  
Natural England

4<sup>th</sup> Floor  
Eastleigh House  
Upper Market Street  
Eastleigh  
Hampshire  
SO50 9YN

---

**From:** [REDACTED]@atkinsglobal.com]  
**Sent:** 10 December 2019 17:02  
**To:** [REDACTED]@naturalengland.org.uk>  
**Cc:** [REDACTED]@atkinsglobal.com>; [REDACTED]  
[REDACTED]@atkinsglobal.com>  
**Subject:** RE: M25 J28 - HRA

Hi [REDACTED]

Thank you for your email regarding the HRA.

We accept your comment regarding the Thames Estuary and Marshes SPA and the additional information included in Table B.1. We can remove it and state it is more than 200m from the Affected Road Network (ARN).

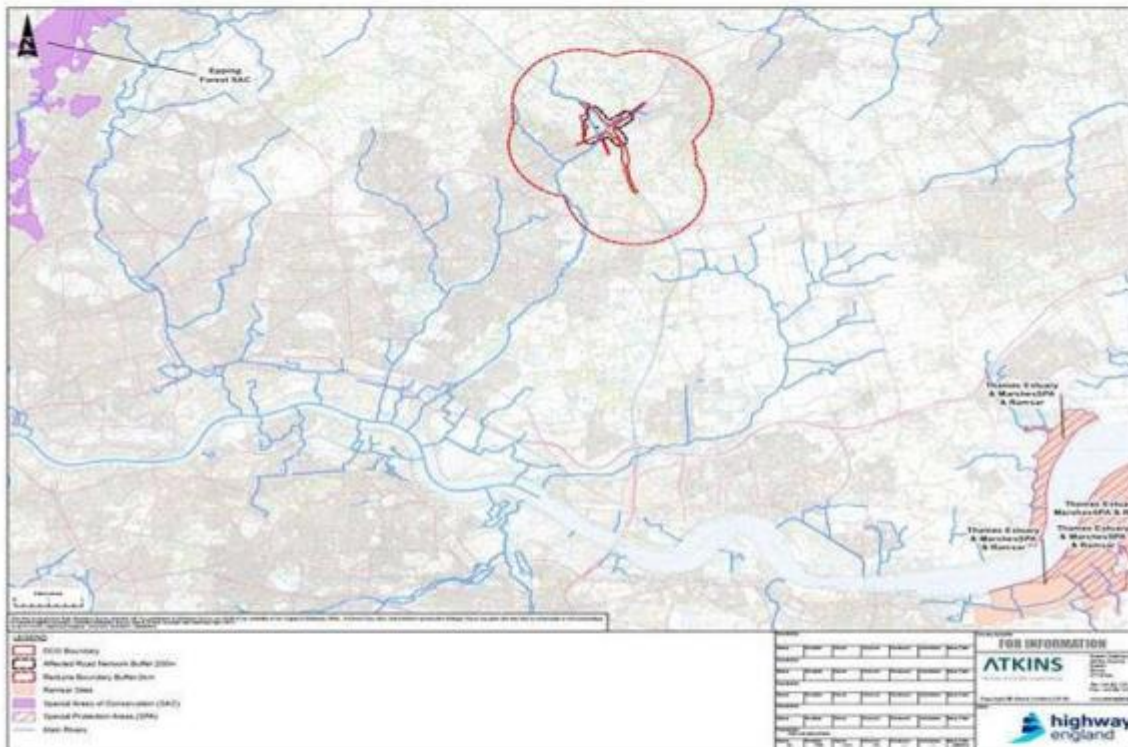
With regards to Epping Forest, DMRB HRA guidance is fairly rigid on the 200m air quality scoping cut off from the ARN. In the extracted figure from our HRA below, the black line shows the ARN plus 200m. The ARN is the extent of the road network where traffic flow will be altered above a certain threshold so may be greater or smaller than the

red line. In this case, the ARN is actually fairly small because it is a very busy junction and the improvements are seen locally. We included Epping Forest on the figure because it was in the figure frame. However, it is well beyond any of our scoping zones. At that distance, there is no potential impact to screen. We could add something into section 3.1 of our HRA to state that Epping Forest is 12km from the redline and ARN and therefore has not been considered at the screening stage.

Is this an acceptable approach?

Many thanks

[Redacted]



[Redacted]  
Principal Ecologist, Infrastructure  
UK & Europe  
Engineering, Design and Project Management

[Redacted]  
[Redacted]



---

**From:** [redacted] <[redacted]@naturalengland.org.uk>  
**Sent:** 09 December 2019 12:07  
**To:** [redacted] <[redacted]@atkinsglobal.com>  
**Cc:** [redacted] <[redacted]@atkinsglobal.com>  
**Subject:** RE: M25 J28 - HRA

Dear [redacted],

Thanks for sending through the HRA Screening Report to review. Apologies once again that it took longer than anticipated.

What's in there at the moment is all good. The only comment I had to make regarding the Thames Estuary and Marshes SPA is in Table B.1.

Under the emissions section it may just be worth clarifying that the site is not vulnerable to changes in air quality as it is over 200m from the ARN. Obviously this is stated, but the inclusion of extra information such as distance from the development, and details about the modelling used are potentially superfluous. It just confuses the point slightly if the main reason that it can be screened out is due to a complete lack of impact pathway.

With that said, I think we would recommend the inclusion of Epping Forest SAC. This is somewhat closer to the development than the Thames Marshes and has received a lot of concern and attention due to air quality impacts. The inclusion of Epping Forest would give you an opportunity to provide more detail on the overall impacts of the scheme for congestion and air quality impacts. This may then be used at a later stage when we consider impacts to SSSIs as well.

Presumably the scheme will have a net benefit impact to congestion(?) and impacts could be screened out this way. However we would like to see the evidence for this. Given the scheme affects extremely busy roads, which are dealing with huge volumes of traffic, it is conceivable that road traffic impacts could be seen extremely far away from the scheme. We just want to make sure that we're doing our due diligence here, and see the arguments and data to show that there would be no impact to Epping Forest.

Does this sound reasonable to you? Happy to discuss.

Many thanks,

[redacted] *Lead Adviser*

*Thames Team  
Natural England*

4<sup>th</sup> Floor  
Eastleigh House  
Upper Market Street  
Eastleigh



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[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing

Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

---

**From:** [REDACTED]@atkinsglobal.com]  
**Sent:** 20 November 2019 18:07  
**To:** [REDACTED]@naturalengland.org.uk>  
**Cc:** [REDACTED]@atkinsglobal.com>  
**Subject:** M25 J28 - HRA

Hi [REDACTED]

Thank you for taking the time to meet with us today to allow us to introduce you to the M25 J28 scheme.

As promised, attached is the HRA screening for the scheme. Following guidance for road schemes, there is a final section in Appendix D relating to the 'finding of no significant effects'. In that we list what agencies were consulted and the response received. This will be updated with your response, when available. If you are able to provide a response by email, we can add this to the document.

As mentioned in the meeting today, since this document was authored, Highways England have updated their advice on HRA (previously HD44/09) and it is now LA115. This doesn't change the content or assessment within the document.

If you have any queries about this document or content, please get in touch.

Thanks

[REDACTED]  
Principal Ecologist, Infrastructure  
UK & Europe  
Engineering, Design and Project Management

[REDACTED]

## A.3 Email (04.03.2020) – valuation of veteran trees

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**From:** [REDACTED]@naturalengland.org.uk>  
**Sent:** 04 March 2020 12:02  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: M25 J28 - veteran tree valuation

Dear [REDACTED]

Thanks for getting in touch.

I am pleased to note that the ES has examined the veteran trees in detail and gone beyond the classification of 'local value' as per the IAN 130/10 advice. In terms of the new valuation Natural England are happy to agree this.

As we previously discussed, veteran trees are considered an irreplaceable habitat which cannot be directly compensated for. Any trees that can possibly be retained should be, and for those trees that must be lost to enable the scheme to proceed, very substantial compensation would be required. Further, given that the veteran trees provide habitat for invertebrates (including red data book species) which cannot be replicated with new planting, the mitigation/compensation package will need to include the retention of veteran tree features on the site, through the careful felling of any trees to be removed, and retention of important features within the wider site.

I am sure you are aware, but, for trees whose features are noted as being suitable for roosting bats, these will be need to be adequately surveyed to establish whether they are being used by bats, and if so what the status of the roosts are, and which bat species are using them. Any roosts to be removed will require a license from Natural England, along with appropriate compensation. It should be noted that any licensed destruction of bat roosts will need to be undertaken at the appropriate time of year, and this should be considered when establishing the programme for the proposed works.

I hope this is helpful,  
Kind regards,

[REDACTED] / Lead Adviser  
Thames Solent Team  
Natural England

4<sup>th</sup> Floor  
Eastleigh House  
Upper Market Street  
Eastleigh  
Hampshire  
SO50 9YN

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

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These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

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**From:** [redacted]@atkinsglobal.com]  
**Sent:** 28 February 2020 16:17  
**To:** [redacted]@naturalengland.org.uk>  
**Cc:** [redacted]@atkinsglobal.com>  
**Subject:** M25 J28 - veteran tree valuation

Dear [redacted]

On other Highways England schemes (such as M25 Junction 10) we have shared our valuation of certain features with Natural England in line with Highways England's IAN 130/10 guidance, which advises that we should consult with the Statutory Environmental Body when assigning our values for certain features if these differ from the guidance provided in IAN 130/10.

The IAN130/10 advice note from Highways England states that local value should be given to 'Areas of habitat; or populations/communities of species considered to appreciably enrich the habitat resource within the local context (such as veteran trees), including features of value for migration, dispersal or genetic exchange'.


Not all veteran trees are the same, and when valuing the veteran tree resource at the site, we have taken into account a number of factors. This includes recent policy updates, the arboriculture category of the trees (as determined by an arboriculture specialist), the biodiversity value of the trees (in terms of opportunities for specialised invertebrates, bryophytes, lichens and bats and other wildlife), and the context of the veteran tree resource in the wider landscape. There are 15 veteran trees within, on or adjacent to the DCO boundary. These have been assessed by an arboriculture specialist and an invertebrate specialist.

The valuation and justification for veteran trees from our Environmental Statement is extracted below, please can you confirm that Natural England agree and provide any relevant comments.

Biodiversity resource	Value	Justification
Veteran trees	County or Unitary Authority	The NPPF (2019) considers veteran trees to be 'irreplaceable habitat.' However, the ecological value of these habitats in the context of the wider countryside needs to be considered. The veteran trees identified within, on or adjacent to the DCO boundary have features suitable for specialised invertebrates of decaying wood including the stag beetle (SPI) and other beetles such as <i>Hylis olexai</i> (Red Data Book 3) and <i>Procrænus tibialis</i> (Red Data Book 3). The specific value of the veteran trees to saproxylic invertebrates is the presence of both sapwood and heartwood decay and also water-filled rot holes. Some of these trees also have features suitable for roosting bats.

Many thanks

[redacted]

  
Principal Ecologist, Infrastructure  
UK & Europe  
Engineering, Design and Project Management



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## A.4 Email (30.04.2020) – draft environmental statement

[REDACTED]

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**From:** [REDACTED]@naturalengland.org.uk  
**Sent:** 30 April 2020 14:13  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: M25 J28 Draft ES chapter  
**Attachments:** M25 J28 Environmental Statement NE Comments.pdf

Dear [REDACTED]

Thanks again for sending through the documents for review. To date I have reviewed; Appendix 7.3 Phase 1 survey, Appendix 7.9 GCN Report, Appendix 7.12 Bat Survey, Chapter 7 of the ES and the Veteran Tree Technical Note. I am yet to review the second set of documents which were sent through and include the LEMP and CEMP. I hope that's okay, Evelina asked for comments back by the 18<sup>th</sup>.

For the most part we have very few comments to make, which, given the volume of documents reviewed, will hopefully come as good news. As always, I will defer to [REDACTED]'s expertise when it comes to the GCN report and Bat Survey. However what I saw seemed thorough and I didn't have any comments to make regarding the Phase 1 survey or the Veteran Tree Technical Note (which was a very useful document).

I have attached a copy of the ES draft with annotated comments. Please let me know if these are formatted correctly and you can read them – I know they have caused issues for people in the past. Broadly speaking very happy, but I do think it would be good to have a discussion regarding a few of the points raised, especially in relation to replacement ratios for some of the habitats, and veteran trees.

I hope you're keeping well in this trying time!

Talk soon,  
[REDACTED] *Lead Adviser*  
*Thames Solent Team*  
*Natural England*

4<sup>th</sup> Floor  
Eastleigh House  
Upper Market Street  
Eastleigh  
Hampshire  
SO50 9YN

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**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing

Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

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**From:** [redacted]@atkingglobal.com]  
**Sent:** 08 April 2020 09:22  
**To:** [redacted]@naturalengland.org.uk>  
**Cc:** [redacted]@atkingglobal.com>  
**Subject:** M25 J28 Draft ES chapter

Hi [redacted]

Before the M25 J28 environmental statement is submitted, we wanted to share the draft biodiversity chapter with you for comment.

The documents can be downloaded from the link below and include:

- ES biodiversity chapter
- Selection of appendices (Phase 1, great crested newt, bat, badger)
- Preliminary Environmental Design drawing. This is a draft for information and includes the details of the scheme and planting proposals.

**Link to documents:** [redacted]

We trust the chapter is self explanatory, but please get in touch if there is anything you would like to discuss, or any further information about the Scheme or appendices you want to see. We would be keen to get your feedback on the valuation of the biodiversity resources listed in the chapter.

I have sent you a note regarding veteran trees in a separate email.

We are starting to prepare the draft great crested newt licence for the Scheme. I will send some specific queries to you and [redacted] shortly that we would like [redacted]'s advice on prior to completing the draft licence for assessment.

Many thanks

[redacted]

[redacted]

Principal Ecologist, Infrastructure  
UK & Europe  
Engineering, Design and Project Management





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## A.5 Email (19.05.2020) – draft environmental statement

**From:** [redacted]@naturalengland.org.uk>  
**Sent:** 19 May 2020 11:50  
**To:** [redacted]  
**Cc:** [redacted]  
**Subject:** svc\_M25J28\_RIP\_PW  
RE: M25 junction 28 - Draft DCO document - Natural England

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear all,

Thank you for sending through the further documents to review. Apologies for the slightly late response, we are currently struggling with workload pressures relating to Covid-19.

**CEMP:**  
No comments to make. Looks comprehensive.

**REAC:**  
A few table entries were slightly out of date or didn't match up with most recent ES drafts and obviously don't yet include any changes which might result from our feedback on the ES draft. Only that extremely minor comment to make.

**Appendix 7.16 / LEMP:**

2.1.9 – Paragraph suggests that management activities will only be undertaken for 5 years.

4.6.1 – Bullet about mitigation ponds - Is this for general mitigation or GCN-specific ponds? Need to check with [redacted] (NE Species Team) for GCN pond standards.

5.1 – Woodland creation.

Whilst we recognise the need for the woodland to provide landscape screening and mitigation, we would be interested to see the inclusion of open areas within the woodland, such as sunny rides/glades to improve structural diversity and biodiversity of the woodland.

I assume that it is mainly for illustrative purposes, but the designs show extremely straight lines between the meadow grassland and woodland areas (in the western part of the scheme). If possible, it would be good to soften these edges to provide a better quality ecotone between the two habitats.

Appendix B – This is the first opportunity I've had to clearly see the mitigation areas that will be provided. The figures shared at ES were slightly harder to decipher, and looked as though mitigation was being provided east of the river. I think it is regrettable that we weren't able to meet earlier to workshop and fully discuss the plans for mitigation for the scheme. I shared early concerns with [redacted] regarding the figures lost/re-provided as a result of the scheme, and the main thing that jumps out about the current mitigation designs is how fragmented the proposals for mitigation are. We would have liked to have been involved in the discussions much earlier to help explore possibilities for mitigation/better understand constraints, and would have strongly advised for ensuring mitigation land was created in a more 'joined-up' way. As it currently stands a large amount of the mitigation is delivered either side of the new road, and of course we recognise the reasons for this and the other drivers in the area, but it does seem that there will be a large impact of fragmentation on these habitats. I just wanted to raise this with you early, because it is likely we would share similar concerns when formally consulted, but recognise it is likely too late in the design phase to make significant changes. I do not believe the concerns are sufficient for us to be raising a formal objection or anything like that.

We don't have any further comments to make at this stage. I hope these comments are helpful.

Please don't hesitate to get in touch and discuss if you wish.

1

Kind regards,  
[redacted] Lead Adviser  
Thames Solent Team  
Natural England

4<sup>th</sup> Floor  
Eastleigh House  
Upper Market Street  
Eastleigh  
Hampshire  
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During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

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**From:** [redacted]@atkingglobal.com]  
**Sent:** 21 April 2020 14:20  
**To:** [redacted]@naturalengland.org.uk>  
**Cc:** [redacted]@atkingglobal.com>; [redacted]@atkingglobal.com>; [redacted]@highwaysengland.co.uk>; [redacted]@atkingglobal.com>; [redacted]@atkingglobal.com>; [redacted]@atkingglobal.com>  
**Subject:** FW: M25 junction 28 - Draft DCO document - Natural England  
**Importance:** High

Hi [redacted]

In advance of the DCO application we would like to share some draft DCO documents with our stakeholders. We would like to share the following:

- Draft Development Consent Order (DCO) and explanatory memorandum
- Register of environmental actions and commitments (REAC)
- Outline LEMP
- Outline CEMP
- Preliminary design drawings (Chapter 1-4 Figure)
- Land plans
- Work plans
- Biodiversity sites and features plan

[https://\[redacted\]](https://[redacted])

As you will appreciate, these documents are draft and are likely to change (including taking into account feedback that we received). We would be grateful if you could let us have comment back by 18 May. If you would require further clarification please do get in touch with [redacted] or myself.

Kind regards,





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## A.6 Email (27.07.2020) – draft environmental statement

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 July 2020 11:34  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** M25 J28 - update  
**Attachments:** M25 J28 Natural England comment log\_23072020\_1.docx

Dear [REDACTED]

I hope this email finds you well. The M25 J28 DOC application has been submitted and accepted by PINS. All the documents are now online: <https://infrastructure.planninginspectorate.gov.uk/projects/south-east/m25-junction-28-improvements/?ipcsection=docs>.

I understand Natural England will be consulted on this application and asked to provide a Relevant Representation. I expect that request will come through soon.

I have collated Natural England comments received to date into the attached spreadsheet, along with our responses to the comments. I have added hyperlinks to the responses which link to documents on the PINS website above. Following receipt of your comments on the ES and veteran trees, we have made some edits to the text within the ES and REAC. These are set out in the attached spreadsheet.

We noted your comment received on 19/05/20 (in response to the review of the draft Outline LEMP) with regards to the overall environmental design for the scheme. There are two sets of drawings for the scheme, the Preliminary Environmental Design (Figure 2.2, application document [APP-039](#)) which shows all habitat creation and reinstatement following construction, and the Outline LEMP drawing (Appendix B, application document [APP-072](#)) which shows only the habitats that will be managed long term under the Outline LEMP. These locations are focussed on areas where long term management is required to meet the commitments made in the ES. These locations relate to the biodiversity resources affected by the Scheme including the rivers, the Site of Importance for Nature Conservation and species. There is a need to work with land within and outside of the new loop road so that mitigation is provided along the river corridor, and in land connected to the wider landscape north west of the site. The proposed design has had to balance the requirements for many important biodiversity resources within the space available around the scheme. The Preliminary Environmental Design will be subject to detailed design prior to construction and we would welcome the opportunity to discuss the design with you and the constraints faced. Are you available for a web-based (teams) meeting one day week commencing 10<sup>th</sup> August? Ahead of the meeting we will provide you with some further information regarding the design which can be discussed on the call. We would also like to invite the LPA ecologist to join the meeting.

If you could let me know your availability w/c 10<sup>th</sup> August I will set up a date and time for a meeting.

Thanks

[REDACTED]


[REDACTED]  
Principal Ecologist, Infrastructure  
UK & Europe  
Engineering, Design and Project Management

[REDACTED]



## A.7 Meeting minutes (13.08.2020) – preliminary environmental design



### Meeting Notes

<b>Project:</b>	M25 junction 28		
<b>Subject:</b>	Preliminary environmental design		
<b>Meeting place:</b>	Online	<b>Meeting no:</b>	
<b>Date and time:</b>	13 August 2020 at 14:00	<b>Minutes by:</b>	Atkins
<b>Present:</b>			<b>Representing:</b> Natural England Natural England LB Havering (Place Services) Atkins Atkins Atkins

Below provides the minutes of the meeting.

ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
1.	<p>Introductions</p> <p>This meeting was set up to discuss what has influenced the extent and layout of the preliminary environmental design for the M25 junction 28 scheme.</p>	No action required	n/a
2.	<p> summarised the pre-meeting information provided, outlining the location of the scheme, key biodiversity and landscape impacts influencing the design and design constraints.</p> <p>The extent and layout of the environmental design has been primarily influenced by the potential impacts of the Scheme on important biodiversity resources and landscape receptors and mitigation and compensation measures required to reduce the effect of these impacts.</p> <p> summarised the key design elements shown on the preliminary environmental design, what land is being</p>	No action required	n/a

<b>Next meeting:</b>	N/A
<b>Distribution:</b>	All attendees, project team
<b>Date issued:</b>	24 August 2020

**NOTE TO RECIPIENTS:**

These meeting notes record SNC-Lavalin understanding of the meeting and intended actions arising therefrom. Your agreement that the notes form a true record of the discussion will be assumed unless adverse comments are received in writing within five days of receipt.



**ATKINS**

Member of the SNC-Lavalin Group



ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	<p>permanently acquired and managed long term, and why elements of the design are located where they are.</p> <p>Note: information provided prior to the meeting, and summarised by [redacted]s attached as Appendix A and Appendix B.</p>		
3.	<p>[redacted] invited an open discussion and comments on the preliminary environmental design and any information raised in this meeting.</p> <p>[redacted] asked what length of time the management commitment is for areas of permanently acquired land. [redacted] noted that the Outline LEMP covers as commitment for 25 years.</p> <p>[redacted] wanted to ask about attendees view of the balance between woodland and grassland creation in the design. This was in relation to previous comments raised by Natural England (NE) regarding the proposed extent of woodland planting. NE ([redacted]) indicated an in principal agreement with the approach to broad balance of habitat creation based on the impacts of the Scheme.</p> <p>[redacted] asked whether there are figures about the figures show the woodland lost vs woodland planting. [redacted] indicated that NE would have a preference for more 'blocky' planting rather than linear strips, and that a linear woodland does not provide the same value of habitat. [redacted] responded that this is preliminary design, the linear nature of the woodland provided west of the loop road is constrained by the gas main easement. However, the comment regarding blocky woodland could be considered in the development of the detailed landscape design if there are opportunities. [redacted] also pointed out that linear woodland features are typical of the impacted area along the M25 and A12, and are a feature of the broader landscape.</p> <p>[redacted] asked the information regarding involvement of the Environment Agency (EA) in the design development of works to the rivers was available. [redacted] noted that the Water Framework Directive (APP- 091) and the SoCG with the EA (APP-099) outline the key matters which were discussed during the development of the preliminary environmental design.</p> <p>No further comments on the design were provided by [redacted] or [redacted]</p>	No action required	n/a
4.	<p>Protected species licences.</p> <p>[redacted] asked for progress on protected species licences. [redacted] responded that the draft great crested newt licence was being prepared, and would be submitted to Natural England for review as part of the DAS agreement. No other draft licences are currently assessed as being required.</p>	No action required	n/a
5.	<p>Bat surveys – trees</p> <p>[redacted] updated those on the call regarding bat roost surveys. Moderate and high potential trees were checked for roosting bats, or evidence of roosting bats in Oct/Nov</p>	No action required	n/a



ITEM	DESCRIPTION AND ACTION	DEADLINE	RESPONSIBLE
	<p>2019, June 2020 and August 2020. A single pipistrelle bat was recorded in a tree in Nov 2019. No bats or evidence of bats has been recorded in any other survey visits. Surveyor reported evidence of grey squirrel was encountered frequently in trees.</p> <p>█ was pleased to hear the additional surveys of moderate and high potential trees have been completed.</p>		
6.	<p>Any other business:</p> <p>█ was pleased that the previous comments from Natural England were taken into consideration and the Environmental Statement has been updated accordingly.</p> <p>█ asked about the Statement of Common Ground. All agreed that this should be created to capture key discussions. █ advised that this should include previous comments relating to the HRA and air quality.</p> <p>█ noted that the ecology items will form part of a SoCG with █ having.</p>	SoCG to be developed in autumn.	Atkins / NE. Atkins / LB Havering

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