

Our ref: HE551519-ATK-GEN-XX-LN-ZM-000028

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
Temple Quay
Bristol
BS1 6PN

M25 junction 28 Project Team
Regional Investment Programme
(South East)
Highways England
Bridge House
1 Walnut Tree Close
Guildford
GU1 4LZ

0300 123 5000

M25j28@highwaysengland.co.uk

By email to:

30 June 2021

m25junction28@planninginspectorate.gov.uk

Dear Sirs,

M25 junction 28 improvement scheme

Planning Inspectorate reference: TR010029

Highways England's Deadline 9 submission – 30 June 2021

Further to the Examining Authority's (ExA's) Rule 8 letter dated 10 May 2021, please find enclosed with this letter the following documents, which have been requested from the Applicant at Deadline 9 (30 June 2021):

1. Highways England's comments on the London Borough of Havering's Deadline 8 submissions (REP8-021) (REP8-022) (REP8-023) (REP8-024) (REP8-025) (REP8-026) (REP8-027) (REP8-028A) (**TR010029/EXAM/9.119**);
2. Highways England's comments on CMS Cameron McKenna Nabarro Olswang LLP on behalf of Cadent Gas's Deadline 8 submission (REP8-029) (**TR010029/EXAM/9.120**);
3. Highways England's comments on the Environment Agency's Deadline 8 submission (REP8-030) (**TR010029/EXAM/9.121**);
4. Highways England's comments on Transport for London's Deadline 8 submissions (REP8-037) (REP8-038) (**TR010029/EXAM/9.122**);
5. Highways England's comments on Savills' on behalf of the Gardens of Peace Muslim Cemetery Deadline 8 submission (REP8-032) (**TR010029/EXAM/9.123**);
6. Highways England's comments on Savills' on behalf of the Gardens of Peace Muslim Cemetery statement on progress of the Tri-Party agreement (REP8-031) (**TR010029/EXAM/9.129**);

7. Highways England's comments Hinson Parry's on behalf of Mr and Mrs Jones of Grove Farm Response to the Applicant's Deadline 7 submissions (REP8-034) and Mr and Mrs Jones' comments on the proposed development (REP8-035) **(TR010029/EXAM/9.124)**;
8. The final draft Development Consent Order **(TR010029/APP/3.1(8))** (Clean version) and **(TR010029/EXAM/9.32(7))** (Tracked version);
9. A schedule of changes to the draft Development Consent Order **(TR010029/EXAM/9.28(7))**;
10. An updated Explanatory Memorandum **(TR010029/APP/3.2(1))**;
11. An updated DCO validation report **(TR010029/APP/3.4(1))**;
12. The final Guide to the Application **(TR010029/EXAM/9.1(9))**;
13. The final Compulsory Acquisition Schedule **(TR010029/APP/9.19(7))** (Clean version) and **(TR010029/EXAM/9.31(6))** (Tracked version);
14. The final Book of Reference **(TR010029/APP/4.3(4))** (Clean version) and **(TR010029/EXAM/9.2(3))** (Tracked version);
15. A schedule of changes to the Book of Reference **(TR010029/EXAM/9.37(1))**;
16. The final Statement of Reasons **(TR010029/APP/4.1(1))** (Clean version) and **(TR010029/EXAM/9.130)** (Tracked version);
17. Highways England's response to the Gardens of Peace Muslim Cemetery's comments on ISH3 regarding trees likely affected by the NMU Scheme **(TR010029/EXAM/9.125)**
18. A position statement on the status of agreements between Highways England and:
 - (i) Trustees of the Gardens of Peace and Cadent Gas;
 - (ii) Glebelands Estates Limited and Luddington Golf Limited;
 - (iii) Transport for London (TfL);
 - (iv) Cadent Gas;
 - (v) UKPN/EPN; and
 - (vi) National Grid Electricity Transmission (NGET) and National Grid Gas (NGG) **(TR010029/EXAM/9.126)**;
19. Highways England's Draft Unilateral Undertaking to London Borough of Havering and Brentwood Borough Council **(TR010029/EXAM/9.128)**;
20. An updated Final Statement of Common Ground with the London Borough of Havering **(TR010029/EXAM/9.8(3))**;
21. A Final Statement of Common Ground with Transport for London **(TR010029/EXAM/9.11(2))**;
22. A Final Statement of Commonality **(TR010029/EXAM/9.18(7))**;

23. A final Environmental Statement – Chapter 6 Noise and Vibration following comments from London Borough of Havering (**TR010029/APP/6.1(4)**);
24. A final clean version of the Environmental Statement – Chapter 12 Materials and Waste (**TR010029/APP/6.1(3)**);
25. A final clean version of the Environmental Statement – Chapter 9: Landscape and visual figures – photomontages viewpoint d (**TR010029/APP/6.2(2)**);
26. A final Environmental Statement – Appendix 5.1 Air Quality (**TR010029/APP/6.3(2)**);
27. A final clean version of the Environmental Statement – Appendix 6.2 Construction noise and vibration (**TR010029/APP/6.3(4)**);
28. A final clean version of the Environmental Statement – Appendix 6.3 Noise Sensitive Receptors (**TR010029/APP/6.3(4)**);
29. A final clean version of the Environmental Statement – Appendix 6.4 Noise Nuisance (**TR010029/APP/6.3(3)**);
30. A final Statutory Nuisance Statement (**TR010029/APP/6.5 (2)**);
31. A final clean version of the Landscape and Visual Figures Winter Photomontages Viewpoint D (**TR010029/EXAM/9.23(2)**); and
32. A final clean version of the Outline Archaeology Management Plan (AMP) (**TR010029/EXAM/9.45(2)**).

Archaeological trial trenching

Highways England would like to inform the ExA that the targeted trial trenching programme agreed with Greater London Archaeology Advisory Service (GLAAS) and London of Borough of Havering has been completed and no nationally significant archaeological remains were discovered. An Interim Report summarising the findings was issued to GLAAS and London Borough of Havering which concludes that there were no notable or significant archaeological finds. This matter is recorded in the Statement of Common Ground with London Borough of Havering (item 8.1.4, page 36, TR010029/EXAM/9.8(3)) and all parties agree that the Scheme has complied with the local heritage policy DC70 Archaeology and Ancient Monuments.

Changes 5 to 8

Further to the ExA's procedural decisions given in its letters dated 5 May 2021, 26 May 2021 and 15 June 2021 to accept the requests for Changes 5 to 8 into the examination (PD-020 and PD-023), the documents numbered 34 to 68 below have been updated to incorporate Changes 5, 6, 7 and 8 into the documents submitted as part of the original application.

Highways England has also taken the opportunity at this deadline to correct errata in certain documents. These are errors which are minor in nature and do not change the meaning of documents, analysis or any assessment. The table at Annex 1 of this letter provides a list of the latest Application documents submitted at this deadline and the reasons for the updates.

Changes 5 to 8 are outlined below:

- Change 5 – Reduction to the realignment of the Weald Brook (Work No. 23C)
- Change 6 – Realignment of UK Power Networks (UKPN) diversion (Work No. 30)
- Change 7 – Refinement of Maylands golf course accommodation works (Work No. 32).
- Change 8 - Grove Farm egress – revisions to Work No. 15.

Highways England can confirm that Change 3, which related to Maylands Golf Course accommodation work, is now withdrawn and is superseded by the acceptance of Change 7 into the Examination. The Applicant's documents submitted with this letter have been updated as necessary to reflect this.

The documents submitted are:

33. Location Plan (**TR010029/APP/2.1(1)**);
34. Land Plans (**TR010029/APP/2.2(3)**);
35. Works Plans (**TR010029/APP/2.2(3)**);
36. Streets, Rights of Way and Access Plans (**TR010029/APP/2.4(2)**);
37. Speed Limits and Traffic Regulations Plans (**TR010029/APP/2.6(3)**);
38. Scheme Layout Plans (**TR010029/APP/2.7(2)**);
39. Engineering Drawing and Sections (**TR010029/APP/2.8(2)**);
40. Biodiversity Sites and Features Plans (**TR010029/APP/2.9(2)**);
41. Historic Environment Sites and Features Plans (**TR010029/APP/2.10(2)**);
42. Special Category Land Plans (**TR010029/APP/2.11(2)**);
43. Consents and Agreements Position Statement (**TR010029/APP/3.3(2)**);
44. Environmental Statement – Chapters 1-4 – Introductory Chapters (**TR010029/APP/6.1(3)**);
45. Environmental Statement – Chapter 7 – Biodiversity (**TR010029/APP/6.1(2)**);
46. Environmental Statement – Chapter 9 – Landscape and Visual (**TR010029/APP/6.1(3)**);

47. Environmental Statement – Chapter 13 – People and Communities **(TR010029/APP/6.1(2))**;
48. Environmental Statement – Chapter 15 – Assessment of Cumulative Effects **(TR010029/APP/6.1(3))**;
49. Environmental Statement – Chapter 16 – Summary **(TR010029/APP/6.1(3))**;
50. Environmental Statement – Chapters 1-4 – Introductory Chapters Figures **(TR010029/APP/6.2(3))**;
51. Environmental Statement – Chapter 5 Air Quality Figures **(TR010029/APP/6.2(3))**;
52. Environmental Statement – Chapter 6 Noise and Vibration Figures **(TR010029/APP/6.2(4))**;
53. Environmental Statement – Chapter 7 Biodiversity Figures **(TR010029/APP/6.2(2))**;
54. Environmental Statement – Chapter 8 Road Drainage and the Water Environment Figures **(TR010029/APP/6.2(3))**;
55. Environmental Statement – Chapter 9 Landscape and Visual Figures **(TR010029/APP/6.2(3))**;
56. Environmental Statement – Chapter 10 Geology and Soils Figures **(TR010029/APP/6.2(2))**;
57. Environmental Statement – Chapter 11 Cultural Heritage Figures **(TR010029/APP/6.2(2))**;
58. Environmental Statement – Chapter 13 People and Communities Figures **(TR010029/APP/6.2(2))**;
59. Environmental Statement – Chapter 15 Assessment of Cumulative Effects Figures **(TR010029/APP/6.2(2))**;
60. Environmental Statement - Chapter 9: Landscape and visual figures – Photomontages Viewpoint B **(TR010029/APP/6.2(2))**;
61. Environmental Statement – Appendix 7.16 - Outline Landscape and Ecological Management and Monitoring Plan (LEMP) **(TR010029/APP/6.3(2))**;
62. Environmental Statement – Appendix 9.1 - Landscape and Visual Impact Assessment **(TR010029/APP/6.3(3))**;
63. Environmental Statement – Non-Technical Summary **(TR010029/APP/6.4(2))**;
64. Outline Construction Environmental Management Plan (CEMP) **(TR010029/APP/7.2(4))**;

65. Register of Environmental Actions and Commitments (REAC) **(TR010029/APP/7.3(4))**;
66. Landscape and Visual Figures Winter Photomontages Viewpoint B **(TR010029/EXAM/9.21(1))**; and
67. Outline Arboricultural Method Statement (AMS) **(TR010029/EXAM/9.64(1))**.

Highways England is not intending to update the location plans in the photomontage documents to show the updated DCO boundary which has changed due to Change 7 as the locations of the viewpoints have not changed.

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 Examining Authority.

Yours faithfully,

Thomas Selby

Thomas Selby
Project Manager

Annex 1. Table summarising reasons for document updates and revisions

Document name	Summary of change	Revised Document reference
Location Plan	Updated to reflect Changes 5-8.	TR010029/APP/2.1(1)
Land Plans	Updated to reflect Changes 5-8.	TR010029/APP/2.2(3)
Works Plans	Updated to reflect Changes 5-8 and following further discussion with Network Rail.	TR010029/APP/2.3(3)
Streets and Rights of way plans	Updated to reflect Changes 5-8.	TR010029/APP/2.4(2)
Speed limits and Traffic Regulation Order Plans	Updated to reflect Changes 5-8.	TR010029/APP/2.6(3)
Scheme Layout Plans	Updated to reflect Changes 5-8 and errata to show the correct existing road markings on Sheet 4.	TR010029/APP/2.7(2)
Engineering Drawings and Sections	Updated to reflect Changes 5-8 and errata to show the correct existing road markings on Engineering sections Sheet 1 of 4.	TR010029/APP/2.8(2)
Biodiversity Sites and Features Plans	Updated to reflect Changes 5-8 and errata to show the correct existing road markings on Sheet 1 of 4.	TR010029/APP/2.9(2)
Historic Environment Sites and Features	Updated to reflect Changes 5-8 and errata to show the correct existing road markings on Sheet 1 of 4.	TR010029/APP/2.10(2)
Special Category Land Plans	Updated to reflect Changes 5-8.	TR010029/APP/2.11(2)
Consents and Agreement Position Statement	Updated to reflect Changes 5-8 and errata: <ul style="list-style-type: none"> • Paragraph 1.2.1, bullet 2 updated. • Appendix A, Other consents table updated to reflect the latest 'status of negotiations' with Natural England (Protected species licence) and the Environment Agency (Wastes and Regulation 12 consents). 	TR010029/APP/3.3(2)
ES Chapter 1-4 Introductory Chapters	Updated to reflect Changes 5-8 and other updates to reflect progress during the examination and errata:	TR010029/APP/6.1(3)

Document name	Summary of change	Revised Document reference
	<ul style="list-style-type: none"> • Paragraph 2.4.4, point l and m updated. • Paragraph 2.4.3, point j updated. • Paragraph 2.5.12, bullet 2 updated. 	
ES Chapter 6 Noise and vibration	<p>Updated to reflect comments made by London Borough of Havering:</p> <ul style="list-style-type: none"> • Paragraph 6.6.1 bullets, 5 and 6 updated. • New paragraph 6.7.18 to 6.7.20 added. • Paragraph 6.8.11 updated. • Paragraph 6.8.14 updated. • Paragraph 6.8.15 moved to become 6.8.16. • New paragraph 6.8.28 added. • Paragraph 6.9.1 updated. • Paragraph 6.9.5 updated. • New 4th bullet added to paragraph 6.9.8. • Paragraph 6.9.11 updated. • Paragraph 6.13.1 updated. 	TR010029/APP/6.1(4)
ES Chapter 7 Biodiversity	<p>Updated to reflect Changes 5-8 and errata:</p> <ul style="list-style-type: none"> • Executive summary, paragraph 4 and 6, bullet 2 updated. • Paragraph 7.5.66 updated. • Paragraph 7.8.6 updated. • Paragraph 7.8.11 updated. • Paragraph 7.8.13 updated. • Table 7.16, row 1, 2 and 12 updated. • Paragraph 7.8.17 updated. • Table 7.17, row 8 and 9 updated. • Paragraph 7.8.58 updated. • Paragraph 7.8.60 updated. 	TR010029/APP/6.1(2)

Document name	Summary of change	Revised Document reference
	<ul style="list-style-type: none"> • Table 7.18, row 1, 2, 10, 12 and 14 updated. • Table 7.19, row 1, 2, 5 and 13 updated. • Paragraph 7.9.24 updated. • Table 7.20, row 1, 3, 8 and 9 updated. • Paragraph 7.9.37 updated. • Paragraph 7.9.39 updated. • Paragraph 7.9.44 updated. • Table 7.21, row 4 and 9 updated. • Paragraph 7.14.2 updated. • Paragraph 7.14.6 updated. 	
ES Chapter 9 Landscape and Visual	<p>Updated to reflect Changes 5-8:</p> <ul style="list-style-type: none"> • Table 9.11, receptor 7 updated. • Paragraph 9.9.2 new bullet 7 added. • Paragraph 9.10.26 updated. • Paragraph 9.10.27 updated. • Paragraph 9.10.34 updated. • Table 9.13, receptor 7 updated. • Table 9.14 updated. 	TR010029/APP/6.1(3)
ES Chapter 13 People and communities	<p>Updated to reflect Changes 5-8:</p> <ul style="list-style-type: none"> • Executive summary, paragraph 3 updated. • Table 13.22, row 1 updated. • Table 13.23, row 1 updated. • Paragraphs 13.8.21 to 13.8.26 updated. • Paragraph 13.8.40 updated. • Paragraph 13.9.2, new bullet 5 added. • Paragraphs 13.10.21 to 13.8.22 updated. • Paragraph 13.10.24 updated. • Paragraph 13.14.3 updated. 	TR010029/APP/6.1(3)

Document name	Summary of change	Revised Document reference
ES Chapter 15 Assessment of Cumulative Effects	Updated to reflect Changes 5-8 and errata: <ul style="list-style-type: none"> • Table 15.5, row 1 updated. • Table 15.6, row 1 updated. 	TR010029/APP/6.1(3)
ES Chapter 16 Summary	Updated to reflect Changes 5-8 and errata: <ul style="list-style-type: none"> • Table 16.1, Landscape and visual, visual receptors row updated. • Table 16.1, Materials and waste updated. 	TR010029/APP/6.1(3)
ES Chapters 1-4 Introductory Chapters Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(3)
ES Chapter 5 Air Quality Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(3)
ES Chapter 6 Noise and Vibration Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(4)
ES Chapter 7 Biodiversity Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(2)
ES Chapter 8 Road Drainage and the Water Environment Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(3)
ES Chapter 9 Landscape and Visual Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(3)
ES Chapter 10 Geology and Soils Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(2)
ES Chapter 11 Cultural Heritage Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(2)
ES Chapter 13 People and Communities Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(2)
ES Chapter 15 Assessment of Cumulative Effects Figures	Updated to reflect Changes 5-8.	TR010029/APP/6.2(2)
ES Chapter 9: Landscape and visual figures – photomontages viewpoint B (summer)	Updated to reflect Change 8.	TR010029/APP/6.2(1)
ES Appendix 5.1 Air Quality	Updated to reflect errata in paragraph 5.3.5.	TR010029/APP/6.3(2)

Document name	Summary of change	Revised Document reference
ES Appendix 7.16 Outline Landscape and Ecological Management and Monitoring Plan	<p>Updated to reflect Changes 1-8, comments from London Borough of Havering and errata:</p> <ul style="list-style-type: none"> • Paragraph 2.1.2 updated. • New paragraph 5.1.6 added. • Paragraph 5.1.18, new bullet 3 added and bullet 6 updated. • Paragraph 5.8.3 updated. • Paragraph 5.8.6 updated. • New footnote 6, page 34 added. • Table 5.7, row 3 updated. • Paragraph 5.8.8, bullet 3 updated. • Paragraph 5.9.8, bullet 3 updated. • Table 6.1 updated in woodland and dry grassland sections. • Appendix A, paragraph A.1.1, bullet 3 updated. • Appendix B, drawings updated to reflect Changes 1-8 and errata: <ul style="list-style-type: none"> ○ Cadent Gas diversion now shown on Sheet 1. ○ Proposed unlined ditch removed from all plans and key plan as this is instead showed on Figure 2.2 Preliminary environmental design. 	TR010029/APP/6.3(1)
ES Appendix 9.1 Landscape and visual impact assessment	<p>Updated to reflect Changes 5-8:</p> <ul style="list-style-type: none"> • Table 9.1, Residents of Grove Farm updated. 	TR010029/APP/6.3(3)
ES Non-Technical Summary	<p>Updated to reflect all Changes 1-8:</p> <ul style="list-style-type: none"> • Page 3, Improvements to M25 junction 28, paragraph 4 updated. • Page 7 and 8, Environmental constraints plan updated. 	TR010029/APP/6.4(2)

Document name	Summary of change	Revised Document reference
	<ul style="list-style-type: none"> • Page 9 and 10, Scheme plan updated. • Page 18, Summary of operational assessment updated. • Page 21, Effects during construction, paragraph 2 updated. • Page 21, Summary of construction assessment updated. • Page 22, Effects during construction, paragraph 2 updated. 	
6.5 Statutory Nuisance Statement	Updated to reflect errata in paragraph 3.1.1, bullet 2.	TR010029/APP/6.5 (2)
Outline Construction Environmental Management Plan (CEMP)	<p>Updated to reflect Changes 5-8 and comments from London Borough of Havering:</p> <ul style="list-style-type: none"> • Paragraph 1.1.16, bullet 2 updated. • Paragraph 4.4.3, bullet list updated. • Paragraph 4.4.5, new bullet 3-5 added. • Paragraphs 5.3.2 to 5.4.4 updated. • Table 12.1, Noise and vibration updated. • Appendix A and B figures updated. • Appendix F, Outline Ecological Habitats and Species Plan, Outline Invasive Species Management Plan and Outline Community Engagement Plan added. • Appendix F, Outline Dust, Noise and Nuisance Management Plan updated: <ul style="list-style-type: none"> ○ Paragraph 2.5.2, bullet 18 updated. ○ New paragraph 2.6.1 added. ○ Paragraph 2.6.2 and 2.6.3 updated. ○ New paragraph 2.7.3 added. ○ Paragraph 2.8.1 updated. ○ Paragraph 3.4.2 updated. 	TR010029/APP/7.2(4)

Document name	Summary of change	Revised Document reference
	<ul style="list-style-type: none"> ○ Table 3.2 title updated. 	
Register of Environmental Actions and Commitments (REAC)	<p>Updated to reflect Changes 5-8 and comments from London Borough of Havering and Transport for London:</p> <ul style="list-style-type: none"> • Table 1.1, new commitment GN0.2 added. • Table 1.1, commitment BD0.8 updated. • Table 1.1, commitment LV0.6 updated. • Table 1.2, new commitment LV1.11 added. • Table 1.2, commitment GS1.8 updated. • Table 1.3, commitment AQ2.1 updated. • Table 1.3, commitment NV2.1 updated. • Table 1.3, commitment RD2.2 updated. • Table 1.3, commitment GS2.11 updated. 	TR010029/APP/7.3(4)
Landscape and Visual Figures Winter Photomontages Viewpoint B	Updated to reflect Change 8.	TR010029/EXAM/9.21(1)
Outline Arboricultural Method Statement (AMS)	<p>Updated to reflect Changes 5-8:</p> <ul style="list-style-type: none"> • Paragraph 5.2.6 updated. • Table 5.1 updated. • Paragraph 5.3.4 updated. • Table 5.2 updated. • Paragraph 5.3.10 updated. • Table 5.4 updated. • Paragraph 6.1.1 updated. • Paragraph 6.1.2 updated. • Appendix B, new rows added to reflect updates from Changes 5-8. • Appendix C, drawings updated to reflect changes 5-8, extent of tree group removal now shown in a red shading. 	TR010029/EXAM/9.64(1)