



National Infrastructure Planning
Sent to: M25junction28@planninginspectorate.gov.uk

Date: 18 October 2021
Our Reference: 20/00583/M25
NSIP reference: TR010029

Dear Sirs

**Planning Act 2008 (as amended)
Application by Highways England for an Order Granting Development Consent for
the M25 junction 28 improvements
Further questions**

I refer to the letter from the Department for Transport dated 14 October 2021 concerning the current Development Consent Order application for the above.

The letter contains the following request:

“The Secretary of State notes the position regarding Brentwood Borough Council’s Local Plan was at an early stage during the Examination. Brentwood Borough Council and the Applicant are asked to provide an update on the position of the Local Plan and whether the emerging plan has been advanced to a stage where policies contain therein are important and relevant to the consideration of the proposed development.”

On behalf of Brentwood Borough Council, I respond as follows:

The Brentwood Replacement Local Plan 2005 remains the Development Plan and its policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the National Planning Policy Framework (NPPF). Due weight should be given to them, according to their degree of consistency with the NPPF - the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given.

The emerging Local Development Plan went through Pre-Submission (Publication Draft) Stage (Regulation 19) consultation early in 2019, with a further focused consultation later that year following revisions to the detailed wording of some of the proposed housing allocations. The plan was submitted to the Planning Inspectorate in February 2020. The examination hearing sessions opened in December 2020, concentrating on strategic matters, with hearings on more detailed matters held from February to July 2021. The Council proposes to make modifications to the plan and a six-week public consultation is

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currently being held, ending on 11 November 2021. The Inspectors will consider any representations made as a result of the consultation. Provided the Inspectors find the plan to be sound, it is anticipated that it could be adopted by the Council in early 2022.

As the emerging plan advances and objections become resolved, more weight can be applied to the policies within it. At this stage there are outstanding objections to be resolved, although issues have been discussed through hearing sessions and main modifications for soundness have been published. The plan provides a good indication of the direction of travel in terms of aspirations for growth in the borough and where development is likely to come forward through proposed housing and employment allocations. While the examination is a further step in progress towards adoption, because the plan has yet to be adopted it is still considered to have limited weight in the decision-making process.

Part of the modifications consultation is a proposed new policy that requires an immediate review of the Local Plan, to include the optimisation of existing and further sustainable transport measures where appropriate along with improvements to several strategic highway junctions, including M25 junction 28 (Policy MG06). This is in relation to ongoing discussion with National Highways (and Essex County Council) regarding the implications of growth on both the local and strategic highway networks. It is important that the current M25 junction 28 improvement works go ahead in order to provide some additional capacity at the junction and accommodate planned growth in Brentwood Borough and beyond. The Council's position remains that these improvement works are necessary but do not solve the entire issue at the junction. Further work is needed through partnership working to identify how additional improvements can be accommodated.

This letter was emailed today to M25junction28@planninginspectorate.gov.uk and has therefore been made before Procedural Deadline of 29 October 2021.

Yours faithfully

Mike Ovenden
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For Brentwood Borough Council

Enc. Schedule of Potential Main Modifications Policy MG06