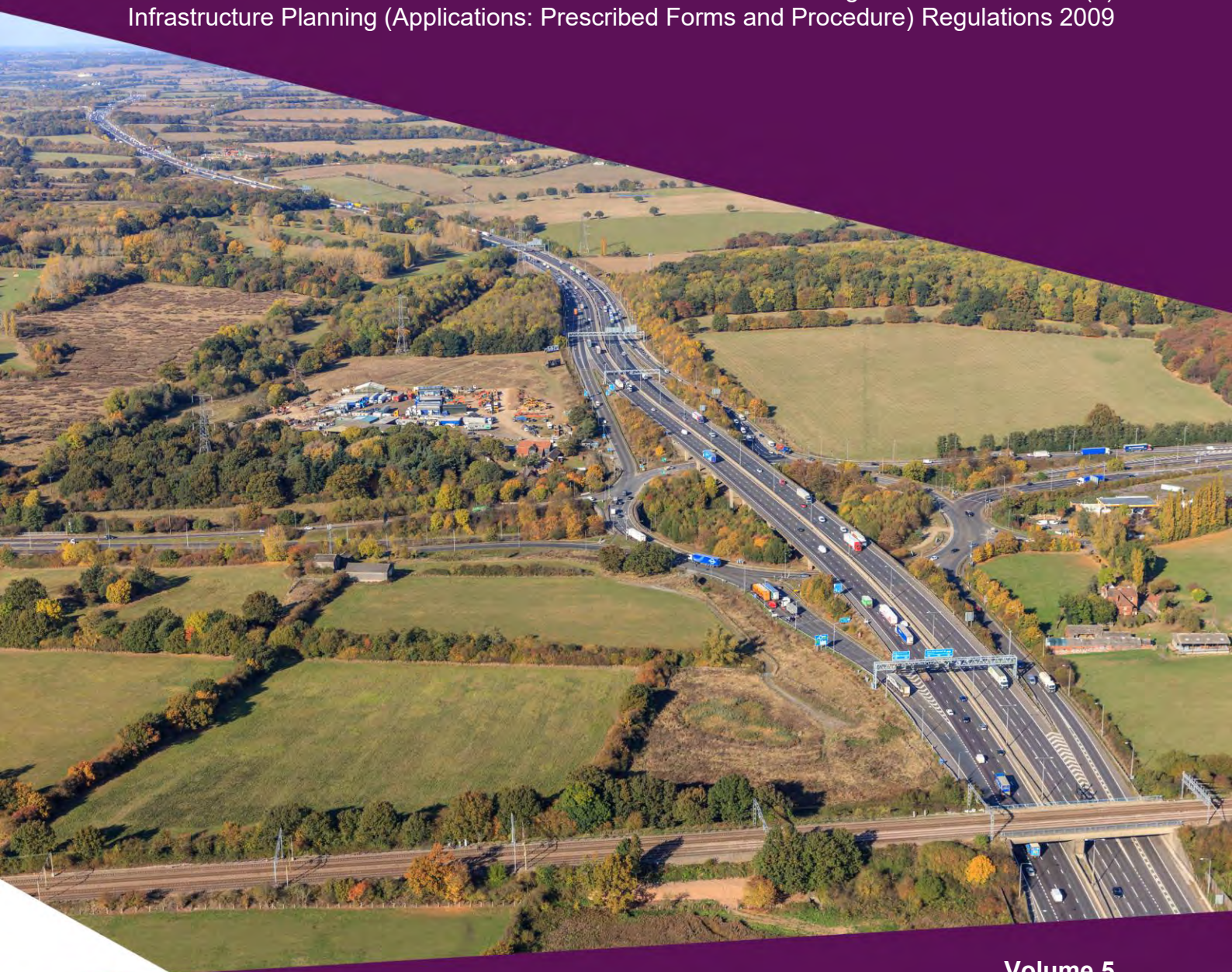


M25 junction 28 improvement scheme TR010029 5.1 Consultation report

Regulation 5(2)(q)
Planning Act 2008 section 37(3)
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

M25 junction 28 scheme Development Consent Order 2020

5.1 CONSULTATION REPORT

Regulation Number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010029
Application Document Reference	TR010029/APP/5.1
Author:	M25 junction 28 improvement scheme project team, Highways England

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Executive summary

- 1.1.1 Highways England (the “Applicant”) proposes to make improvements to junction 28 on the M25. The M25 junction 28 improvement scheme (the “Scheme”) is part of the government’s Road Investment Strategy (“RIS”), which will ensure key corridors of the strategic road network (“SRN”) can be upgraded and delivered in a way which minimises disruption and keeps road users moving. This Scheme constitutes a Nationally Significant Infrastructure Project (“NSIP”) under sections 14(1)(h) and 22(1)(b) (alteration of a highway) of the PA 2008 and is located to the west of Brentwood in Essex and east of Harold Wood in outer London.
- 1.1.2 The objectives of the Scheme are:
- to increase capacity and reduce congestion and delays by providing an improved link from M25 to A12.
 - to reduce the incident rate and resulting disruption by increasing the capacity of the roundabout.
 - to improve safety on the roundabout by reducing traffic levels and redesigning the existing layout.
 - to cater for future traffic demands to enable development and economic growth.
 - to minimise the impact on local air quality and noise by smoothing traffic flow.
 - to protect access for non-motorised users (pedestrians and cyclists) and improve conditions wherever possible.
- 1.1.3 Alongside these objectives, the Scheme also aims to:
- where possible, improve air quality with regards to vehicle emission generally, and specifically at the existing declared Air Quality Management Areas (AQMA).
 - minimise the environmental impact as measured in accordance with Design Manual for Roads and Bridges (DMRB).

Programme of engagement and consultation

- 1.1.4 A multi-staged approach has been taken to consultation during the development of the current proposals for junction 28. This process has included a programme of options, statutory, supplementary and targeted consultation, as well as other ongoing engagement with a range of consultees and stakeholders. The purpose of this programme was to help inform the selection of the preferred option, followed thereafter by the development of the Scheme. This report sets out the engagement activities that have taken place and explains how the feedback received has influenced the Scheme that is the subject of the DCO application. Each phase of the consultation programme is summarised below.

Options consultation

- 1.1.5 The options consultation took place following the selection of three shortlisted options from a long list of potential options. The three short listed options were known as Option 5B (single lane loop road, including widening of the M25 viaduct), Option 5C (single lane loop road) and Option 5F (two-lane loop road). Between 14 November 2016 and 6 January 2017, a series of consultation

activities were undertaken with the aim of seeking views on the need for the Scheme and the three short listed options, including the publication of a consultation questionnaire and consultation brochure. This options consultation was not a statutory consultation under the PA 2008.

- 1.1.6 A total of 267 responses were received to this consultation, with 92% of respondents agreeing that there was a need to improve M25 junction 28. Overall there was a preference for Option 5F, which was consistent with the findings of the technical assessments, the results of which are summed up in the Scheme Assessment Report. A preferred route announcement (PRA) for the Scheme was made on 22 August 2017.
- 1.1.7 Following the PRA, work began to develop the Scheme that is the subject of the Development Consent Order (DCO) application. A key part of this development was undertaking engagement with key stakeholders, such as landowners, local authorities and statutory environmental bodies. This engagement led to changes to the Scheme, including the introduction of an urban merge (to minimise disruption during construction) and the inclusion of clear span bridges and meanders on the Ingrebourne River (to minimise the impact on the water environment).

Statutory consultation

- 1.1.8 Once the Scheme had been developed and environmental work progressed, the Scheme was presented for statutory consultation to seek views and feedback. As the Scheme is a NSIP, the requirements of the PA 2008 and associated legislation and guidance have been met as detailed in this report.
- 1.1.9 From 3 December 2018 to 28 January 2019, the Applicant undertook a statutory consultation pursuant to section 42, 47 and 48 of the PA 2008. A 28-day extension to the consultation (to the 28 February 2019) was also given to allow newly identified consultees the opportunity to provide feedback on proposal.
- 1.1.10 As well as seeking consultees' views, preferences and ideas on the Scheme's design, feedback was also sought on the Preliminary Environmental Information Report (PEIR).
- 1.1.11 A total of 281 responses were received from section 42, section 47 and section 48 consultees with 88% of respondents saying there was 'a need to improve junction 28'.
- 1.1.12 The Applicant considered the responses received at statutory consultation and took account of the feedback received. This led to further ongoing engagement and a number of design refinements, including the proposed realignment of Weald Brook and a section of the Ingrebourne River, the identified need to divert an existing high-pressure gas pipeline and the amendment of the location proposed for a replacement gantry. Following statutory consultation, the Applicant also undertook further environmental assessments, including additional survey work, and identified further measures to mitigate the effects of the Scheme. These included a biodiversity assessment that highlighted the environmental impact on the Ingrebourne Valley SMI, the visual impact of the new loop road and potential impacts on Maylands Golf Course.

Supplementary consultation

- 1.1.13 The Applicant undertook a supplementary consultation from 4 November to 2 December 2019. This focussed on proposed changes to the scheme design following statutory consultation and also to report newly identified environmental impacts.
- 1.1.14 During the supplementary consultation 21 responses were received.
- 1.1.15 The Applicant considered the responses received and undertook further engagement and assessment work around the identification of the preferred route alignment for the proposed diversion of the existing underground gas pipeline, and the potential impact to the second tee of the golf course. As a result further changes were made to the Scheme, including refinement of the DCO boundary.
- 1.1.16 Whilst this consultation was not a statutory consultation, new section 42 consultees had been identified at this stage and so the opportunity was taken to invite them to comment on the matters that were raised at statutory consultation, in addition to those being raised as part of the (non-statutory) supplementary consultation.

Targeted consultation

- 1.1.17 A targeted consultation was undertaken from 31 January 2020 to 27 February 2020. The consultation related to a proposed extension of the red line boundary to allow the reconfiguration of the second hole of Maylands Golf Course. Luddington Golf Limited (who run Maylands Golf Club), London Borough of Havering and Glebelands Estates Limited were consulted on this proposal. These consultees were identified as being directly affected by the proposed extension of the red line boundary. This targeted consultation was not a statutory consultation under the PA 2008.
- 1.1.18 Responses were received from Luddington Golf Limited (on behalf of Maylands Golf Club) and London Borough of Havering.
- 1.1.19 The Applicant considered the responses received and concluded that the red boundary extension proposed should be incorporated into the Scheme to allow relocation and reconfiguration of the Golf Course to take place. The Applicant proposes to work closely with Luddington Golf Limited to ensure the optimal solution for relocation and reconfiguration of the second hole of Maylands Golf Course is delivered having regard to all relevant considerations, including the concerns the Club has raised.

Consultation requirements

- 1.1.20 The PA 2008, Part 5 Chapter 2 lays out a number of consultation requirements for the promoters of NSIPs, including the duty to consult with the local community, prescribed consultees, landowners and local authorities.
- 1.1.21 Sections 42, 47, 48 and 49 of the PA 2008 requires the Applicant to have regard to responses received as a result of statutory consultation. Section 37(3)(c) requires that an application for a DCO must be accompanied by a consultation report.

- 1.1.22 Section 50 of the PA 2008 requires the Applicant to have regard to any guidance issued by the Secretary of State (“SoS”) about pre-application procedure. This guidance is provided within former DCLG’s ‘Planning Act 2008: guidance on the Pre-application process’ (March 2015) and the Applicant has had regard to this in carrying out consultation during the pre-application period. The Applicant has also had regard to the Planning Inspectorate’s Advice Note Fourteen (Compiling the Consultation Report) and the Applicant’s own guidance, ‘How Highways England plans major schemes’.

Statement of Community Consultation (SoCC)

- 1.1.23 As required under section 47 of the PA 2008, the Applicant drafted a SoCC setting out how statutory consultation would be carried out with the local community, residents, businesses and visitors in the Scheme’s vicinity.
- 1.1.24 London Borough of Havering (LB Havering), Brentwood Borough Council (Brentwood BC), Essex County Council (Essex CC) and the Greater London Authority (GLA) were consulted on the content of the draft SoCC in October 2018. Following consideration of the comments received, the SoCC was amended and published on Highways England’s website on 3 December 2018. An advert advising the community that the SoCC was available to view was then published in the local press in compliance with section 47(6) of the PA 2008 on 5 (Brentwood Gazette) and 7 (Romford Recorder) December 2018.

Consultation with consultees on proposed application (section 42)

- 1.1.25 Section 42 of the PA 2008 requires the Applicant to consult with:
- prescribed consultees (section 42(1)(a)),
 - the relevant local authorities (section 42(1)(b))
 - the Greater London Authority (section 42(1)(c)) where applicable; and
 - those with an interest in the land (Persons with an Interest in Land or PiLs) and those who would, or might be entitled to make a relevant claim (sections 42(1)(d) and 44).
- 1.1.26 The Applicant undertook statutory consultation with section 42 consultees for a period of eight weeks from 3 December 2018 to 28 January 2019, with an extension to 28 February 2019 being provided for some specific consultees. Overall, a total of 20 detailed responses were received from section 42(1)(a) and (1)(b) consultees to the statutory consultation. Section 42(1)(d) consultee responses (PiLs) were considered alongside responses from members of the local community as explained below.

Consultation with local community on proposed application (section 47)

- 1.1.27 Section 47 of the PA 2008 requires the Applicant to prepare a statement (SoCC) setting out how the applicant proposes to consult those ‘living in the vicinity of the land’ on the proposed application and undertake consultation in accordance with the SoCC. For the purposes of consultation this included the area identified in **Figure 7.2.1**.
- 1.1.28 The Applicant undertook a statutory consultation with the local community on the Scheme for eight weeks from 3 December 2018 to 28 January 2019. The consultation was carried out in accordance with the published SoCC. An

extensive communication programme was undertaken to raise awareness of the consultation.

1.1.29 A variety of channels were used including:

- Advertising in the Brentwood Gazette, Romford Recorder, Essex Chronicle, London Gazette and The Times newspapers
- Writing to local and national organisations, and community groups
- A mail-out to just under 60,000 residents and businesses located in the vicinity of the Scheme
- Social media campaign
- The issue of a press release at the start of the consultation
- Support from the local authorities (LB Havering, Brentwood BC and Essex CC) in publicising the consultation through their own communication channels

1.1.30 During the eight-week statutory consultation period, twelve consultation events were held (8 of these were held at local community centres/conference centres/town halls and 4 in a mobile vehicle).. These took place from 5 December 2018 to 18 January 2019. The exhibitions provided an opportunity for local people to talk to the project team, pick up a response form and respond to the consultation.

1.1.31 The full suite of consultation materials was available to view in three display locations and a further eight deposit points were provided for people to collect brochures and response forms.

1.1.32 The Applicant received 261 responses from section 47 consultees (246 through the response form and 15 free flow responses through a letter or email). These response forms would also have included responses from PiLs (section 42(1)(d)) as the form did not differentiate between different types of consultees.

1.1.33 Based on the responses received, 88% of respondents thought there was a need to improve junction 28 with the main reason being 'congestion and delays at junction 28'. The main concerns raised were in respect of traffic impacts, construction impacts, non-motorised users, the Green Belt designation and possible environmental impacts such as water, geology and soils, biodiversity and air quality.

Publicity notices (section 48)

1.1.34 Section 48 requires the Applicant to publicise the proposed application in the prescribed manner in national and regional newspapers as set out in Regulation 4 of the Infrastructure (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations). A notice advertising the Applicant's intention to apply for DCO in respect of the Scheme was published in four newspapers - The Guardian, The London Gazette, Romford Recorder and the Brentwood Gazette – between 3 and 12 December. These details can be found in **Table 7.7.1**. In compliance with Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), a copy of the section 48 notice was also provided to the relevant consultation bodies for the purposes of those regulations (see **Annex C**).

Having regard to the consultation responses

- 1.1.35 A key component of the consultation requirements for NSIPs is to have regard to the consultation responses. The Applicant used a multi-disciplinary approach to consider the consultation responses and any resulting changes to the Scheme in accordance with section 49 of the PA 2008. A database of all section 42, 47 and section 48 responses was compiled, and workshops were held where each issue arising from the responses was considered by the Applicant with representatives from each relevant specialist discipline.
- 1.1.36 **Table 5.12.1** (summary of responses from section 42 consultees) and **Annex E6** (Tabulated summary of responses from section 47 and 48 consultees) set out the responses received and demonstrate the regard the Applicant has had to the matters raised by consultees.
- 1.1.37 The responses to statutory consultation also formed an important basis for ongoing discussions with key stakeholders, including the host local authorities, the Environment Agency and affected utility companies. Responses received during statutory consultation, along with design development, ongoing engagement with stakeholders and further environmental assessments led to a number of changes being made to the Scheme, including redesign of the A12 eastbound exit (off slip) road, the development of mitigation proposals and the inclusion of proposals to divert an existing underground high pressure gas pipeline.

Environmental Impact Assessment (EIA)

- 1.1.38 The Scheme constitutes EIA development, as defined by the EIA Regulations. An EIA has been carried out in respect of the Scheme and the results of that assessment are presented in the Environmental Statement (ES) accompanying the DCO application (application document TR010029/APP/6.1). The EIA regulations prescribe certain steps to be undertaken as part of the pre-application consultation phase whilst Planning Inspectorate Advice Note Seven: EIA, Process, Preliminary Environmental Information and Environment Statements provides advice on screening and scoping under the EIA Regulations. **Paragraphs 1.7.1 to 1.7.8** of this report explains the steps taken by the Applicant in compliance with the EIA Regulations.
- 1.1.39 The EIA scoping process commenced in September 2017 and a request for a scoping opinion in the form of a letter to the Inspectorate, was submitted on 10 November 2017 (see **Annex A**). A scoping opinion from the Inspectorate was provided on 20 December 2017.
- 1.1.40 Engagement with environmental consultees during the period preceding statutory consultation assisted with the production of the PEIR, which was published in December 2018 as part of the statutory consultation.
- 1.1.41 The SoCC included information on the PEIR and informed the community that this report would be made available as part of the consultation materials produced for the statutory consultation.
- 1.1.42 As mentioned above, engagement continued with statutory environmental bodies after the statutory consultation to seek to address the matters raised. For example, this has included sharing documents with the Environment Agency

such as the flood model supporting the Flood risk assessment report and the draft Water Framework Directive compliance assessment report.

- 1.1.43 These discussions resulted in changes to the Scheme, such as mitigation works within the Ingrebourne River. These changes along with additional environmental information on trees were the subject of the supplementary consultation referred to above. Consultation with the relevant local planning authorities and Natural England was also undertaken in the context of developing the Applicant's proposals for ecological compensation. Further information on these matters are provided in the Biodiversity chapter (Chapter 7) of the ES (application document TR010029/APP/6.1).

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Annexes referred to in this report

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A	Scoping request to the Inspectorate
B	Options consultation
B1	Stakeholder list
B2	Consultation questionnaire
B3	Consultation brochure
B4	Public exhibition boards
B5	Stakeholder letters
B6	Media advert
B7	Posters
B8	Regional Investment Programme (RIP) M25 junction 28 improvement scheme Stage 2 report on public consultation
C	Statutory consultation (section 42)
C1	Section 46 letter to the Inspectorate
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C3	Land interest questionnaires (LIQs) and covering letters accompanying them
C4	Consultation brochure
C5	Consultation response form
C6	Section 47 notices
C7	Section 48 notices
C8	Development Consent Order (DCO) leaflet
C9	Section 42 letter
C10	Letters for extension to the consultation
C11	Copies of section 42 responses to consultation
D	Statement of Community Consultation (SoCC)
D1	Draft SoCC

Annex	Description
D2	Updated draft SoCC
D3	Covering letters with draft SoCC
D4	Responses from local authorities
D5	Reminder letters to local authorities
D6	Published SoCC
D7	Advert publicising the consultation
E	Statutory consultation (section 47)
E1	List of all other stakeholders
E2	Roller banners
E3	Photographic image of junction 28
E4	Letter sent to people living or working in the consultation target area
E5	Press release
E6	Full copy of the tabulated summary of responses received from section 47 consultees
F	Supplementary consultation
F1	Consultation brochure and response form
F2	Overview of key scheme changes plan
F3	Red line boundary plan
F4	Newspaper notice
F5	Supplementary consultation letters
G	Targeted consultation
G1	Consultation letter
G2	Responses to targeted consultation

Glossary

Term	Meaning
The Applicant	Highways England (formerly known as the Highways Agency)
Book of Reference	Described in regulation 7 of the APFP Regulations and contains the names and addresses of those with an interest in the land affected by the Scheme and those who may be able to make a claim. The names of those whose easements or private rights may be extinguished, the owner of any Crown interest in land for the Scheme and details of any land the acquisition of which is subject to special parliamentary procedure unless the Secretary of State is satisfied otherwise, which is special category land, or which is replacement land.
Outline Construction Environmental Management Plan	A plan by the contractor describing how the environmental impacts of construction activities of the Scheme will be minimised and mitigated.
Consultation target area	Section 47 of the PA 2008 requires a developer to consult with the local community, which is defined as 'people living within the vicinity of the land'. For this Scheme, this was defined as people living and working within an approximate one-mile radius.
Development Consent Order	A consent for the construction, operation and maintenance of Nationally Significant Infrastructure Projects (NSIP) given by the relevant Secretary of State on the recommendation of the Planning Inspectorate under the PA 2008.
Environment Agency	A non-departmental public body with responsibilities relating to the protection and enhancement of the environment in England.
Environmental Impact Assessment	A process of evaluating the likely environmental impacts of a proposed development, including inter-related socio-economic, cultural and human health impacts, both beneficial and adverse.
Environmental Statement	Report setting out the findings of the EIA, including at least the information reasonably required to assess the likely significant environmental effects of the Scheme.
Examining Authority	The person(s) appointed by the Secretary of State (SoS) to assess the DCO application and make a recommendation to the SoS.

Term	Meaning
Historic England	Publicly funded body that champions and protects England's historic places; also known as the Historic Buildings and Monuments Commission for England.
Local authorities	County, metropolitan, or district councils, who have statutory responsibilities within their administrative areas.
Nationally Significant Infrastructure Project	A project of a type and scale defined under the PA 2008 and by Order of the Secretary of State relating to energy, transport, water, wastewater and waste generally. These projects require a single development consent, which includes consents under different regimes, such as planning permission, listed building consent and scheduled monument consent.
Natural England	Executive non-departmental public body responsible for the natural environment.
Noise important areas	Areas where the 1% of the population that are affected by the highest noise levels from major roads are located according to the results of Defra's strategic noise maps.
Non-prescribed consultees	Additional consultees not identified within the PA 2008.
Persons with an interest in Land	Persons with an interest in land which is subject to the land acquisition or works powers within the DCO (within Category 1, 2 or 3 of section 44 of the PA 2008 – generally owners, occupiers or people with an interest in or right in the land).
Preferred Route Announcement	Designation of a proposed option as a 'preferred route' by the Department for Transport provides a form of planning protection from development of land in the vicinity of the M25 junction 28 improvement scheme.
Prescribed consultees	The persons listed in Schedule 1 to the APFP Regulations who must be consulted in relation to the Scheme under section 42(1)(a) of the PA 2008.
Statement of Community Consultation	Prepared in accordance with section 47 of the PA 2008, to inform, explain and communicate how the consultation will be undertaken.
Strategic road network	The network of approximately 4,300 miles of motorways and major 'trunk' A roads across England, managed by Highways England.

Term	Meaning
Statutory undertakers	Persons with regulatory powers and duties, such as gas, electricity, water and transport providers or transmitters.
Water Framework Directive	Legislation published by the European Union, known as the 'Water Framework Directive' (2000/60/EC), establishing a framework for European Community action in the field of water policy.

List of abbreviations

Abbreviation	Meaning
APFP Regulations	The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009
AQMA	Air Quality Management Areas
BOR	Book of Reference
Brentwood BC	Brentwood Borough Council
Outline CEMP	Outline Construction Environmental Management Plan
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
Essex CC	Essex County Council
EA	Environment Agency
EIA	Environment Impact Assessment
EIA Regulations	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
ES	Environmental Statement
ExA	Examining Authority
GLA	Greater London Authority
GLAAS	Greater London Archaeology Advisory Service
The Inspectorate	Planning Inspectorate
ITA	Integrated Transport Authorities
LB Bexley	London Borough of Bexley
LB Havering	London Borough of Havering
LIQ	Land Interest Questionnaire
NMU(s)	Non-motorised user(s)
NSIP	Nationally Significant Infrastructure Project

Abbreviation	Meaning
PA 2008	The Planning Act 2008 (as amended)
PEIR	Preliminary Environmental Information Report
PiLs	Persons with an interest in Land
PRA	Preferred Route Announcement
This report	M25 junction 28 improvement scheme consultation report
REAC	Register of Environmental Actions and Commitments
RIS	Road Investment Strategy published by DfT in 2014
SEB	Statutory environmental bodies
SoCC	Statement of Community Consultation
SMI	Site of Metropolitan Importance
SO	Scoping Opinion
SRN	Strategic Road Network
TA	Transport Assessment
TfL	Transport for London
WFD	Water Framework Directive

Sections of the Planning Act 2008 referred to in this report

Section 14	Nationally significant infrastructure projects: general
Section 22	Highways
Section 37	Applications for orders granting development consent
Section 42	Duty to consult
Section 43	Specifies local authorities for the purposes of section 42(1)(b)
Section 44	Categories for purposes of section 42(1)(d)
Section 46	Duty to notify Secretary of State of proposed application
Section 47	Duty to consult local community
Section 48	Duty to publicise
Section 49	Duty to take account of responses to consultation and publicity
Section 50	Guidance about pre-application procedure
Section 152	Compensation in case where no right to claim in nuisance

Summary of consultation stages referred to in this report

Options consultation	Guidance on DCO applications states that applicants, especially for large projects with long development periods, such as the Scheme, should consider undertaking non-statutory consultation at an early stage where options are still being considered. This is in order to help the Applicant inform proposals and establish a preferred option to take to statutory consultation.
Statutory consultation	As the Scheme is an NSIP, certain prescribed consultation steps are required. This includes a duty to inform and engage statutory consultees, landowners, local authorities, members of the local community and other statutory consultees under sections 42, 47 and 48 of the PA 2008. Section 49 of the PA 2008 requires the Applicant to take into account the responses received during these consultations and have regard to them when developing the final design.
Supplementary consultation	As the Scheme has been in development for several years, a supplementary round of consultation was undertaken to consult on specific design changes and newly identified impacts which had arisen since statutory consultation. Whilst this consultation was not a statutory consultation, new section 42 consultees had been identified at this stage and so the opportunity was taken to invite them to comment on the matters that were raised at statutory consultation, in addition to those being raised as part of the (non-statutory) supplementary consultation.
Targeted consultation	A targeted consultation was undertaken with three consultees as a result of proposed changes to the Scheme proposed red line boundary. This targeted consultation was not a statutory consultation under the PA 2008.

1 Introduction

1.1 Purpose of this report

1.1.1 This consultation report forms part of Highways England's application to the Secretary of State ("SoS") for a Development Consent Order ("DCO") for the M25 junction 28 improvement scheme (the "Scheme"). It has been produced in accordance with sections 37(3)(c) and 37(7) of the Planning Act 2008 ("PA 2008") which requires all applications for a DCO to be accompanied by a consultation report. This report details the methodology and outcomes of the consultations undertaken between 2016 and submission of the DCO application and how responses to the consultation and the opinions expressed have been taken into account in the final design of the Scheme.

1.1.2 This report sets out how:

- Highways England (the Applicant) has carried out pre-application consultation on the Scheme.
- The consultation undertaken complied with the statutory requirements that apply under PA 2008 and associated legislation and guidance.
- The Application has taken the responses received into account in developing the Scheme.

1.1.3 This report has been developed by applying the following guidance:

- The Planning Inspectorate's Advice Note Fourteen: Compiling the consultation report¹ – as set out in <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2013/04/Advice-note-14v2.pdf>
- PA 2008: Guidance on the pre-application process² (published by former DCLG) See **Table 11.2.1**.

1.2 Structure of this report

1.2.1 **Chapter 1** introduces the Applicant, explains why the Scheme is needed and its key features, along with a summary of the statutory requirements regarding who needs to be consulted, and an overview of the programme of engagement and consultation. Lastly it outlines why the Scheme has been identified as an EIA project.

1.2.2 **Chapter 2** clarifies the Scheme location and provides some context around the current issues and constraints, as well as explaining the Scheme's objectives and summarising the development of the Scheme.

1.2.3 **Chapter 3** gives a summary of the Scheme history and details the consultation activities undertaken in 2016 as part of the options consultation including details relating to: who was consulted, the materials produced, the channels that were used and how the consultation was publicised. This chapter also includes a summary of the feedback received and the actions taken by the Applicant in having regard to that feedback. It also explains the PRA decision that was made, and the option taken forward. It then details ongoing engagement with stakeholders, and any further

¹ Advice Note fourteen: Compiling the consultation report (version 2), The Planning Inspectorate, republished July 2018

² Planning Act 2008: Guidance on the pre-application process, former Department for Communities and Local Government, updated March 2015

changes to the Scheme, as well as outlining the Scheme proposal taken forward to statutory consultation in 2018.

- 1.2.4 **Chapter 4** details the engagement that took place between options consultation and statutory consultation, explaining when it took place and with whom, and outlines the changes to the proposals that arose as a result of this engagement.
- 1.2.5 **Chapter 5** details the consultation with statutory consultees (section 42), when it took place, the consultees and how they were identified, the consultation materials produced and the channels used, as well as explaining why there was an extension to the consultation. It summarises the feedback received, how the Applicant has had regard to that feedback, and identifies whether this has resulted in a change to the Scheme.
- 1.2.6 **Chapter 6** outlines the development of the Statement of Community Consultation (SoCC) with the four 'host' authorities. It also details where the SoCC was published and how it was complied with.
- 1.2.7 **Chapter 7** details the consultation with the local community (section 47), when it took place, the details of consultees and how they were identified, the consultation materials produced, and the channels of communication used. It outlines the feedback received, how the Applicant has had regard to that feedback and identifies where this has resulted in a change to the Scheme.
- 1.2.8 **Chapter 8** details the engagement taken place following the statutory consultation and up to supplementary consultation, highlighting the changes made to the Scheme as a result of the engagement with key stakeholders during this period.
- 1.2.9 **Chapter 9** provides details of the supplementary consultation undertaken in November and December 2019. It lists the consultation materials produced, explains how the consultation was publicised, outlines the feedback received, how the Applicant has had regard to that feedback and identifies if this has resulted in a change to the Scheme. It also details ongoing engagement since supplementary consultation and changes made to the scheme as a result of the engagement.
- 1.2.10 **Chapter 10** provides details of the targeted consultation undertaken in January – February 2020. It explains why the consultation took place, the consultation materials produced and who was consulted, outlines the feedback received and how the Applicant has had regards to that feedback.
- 1.2.11 **Chapter 11** provides a conclusion to the overall pre-application consultation undertaken and explains how the Applicant has complied with all relevant statutory requirements.

1.3 About the Applicant

- 1.3.1 The Applicant is a publicly funded, government owned company that plans, designs, builds, operates and maintains England's motorways and major A-roads. As well as managing one of the most advanced road networks in the world, the Applicant provides information and assistance for the millions of people who use the SRN.

1.4 The Scheme

- 1.4.1 The Scheme comprises the following key works elements:

Highways Works

- the creation of a new two lane loop road with hard shoulder, for traffic travelling from the M25 northbound carriageway onto the A12 eastbound carriageway, including the provision of three new bridges (Alder Wood bridge, Duck Wood bridge and Grove bridge) and an underpass (Grove Farm underpass) to carry the new loop road over existing infrastructure (Work No. 6);
- realignment of the existing A12 eastbound exit (off-slip) road (Work No. 2) to accommodate the new loop road including the provision of a new bridge (Maylands bridge) and the extension of the existing Grove culvert;
- improvements to the existing A12 eastbound and westbound carriageways and A12 eastbound entry (on-slip) road (Work Nos. 1, 3 and 4);
- realignment of the existing M25 northbound on-slip (Work No. 8);
- improvements to the existing Junction 28 roundabout, the existing M25 northbound carriageway and the M25 northbound off-slip (Work Nos. 5, 7 and 12);
- new gantries over the M25 carriageway (Work Nos. 9, 10 and 11);
- alterations of existing private access and egresses and the provision of new private means of access to accommodate the new loop road (Work Nos. 13, 14, 15 and 16);

Earth and drainage work

- earthworks including the deposit of surplus construction materials on two identified sites (Work Nos. 17 and 18);
- three new attenuation ponds and associated drainage and access roads (Works Nos. 19A, 19B, 20A, 20B, 21A and 21B) and a new drainage outfall pipe (Work No. 22);

Realignment of watercourses

- realignment of the Weald Brook and the Ingrebourne River (Work Nos. 23A, 23B, 23C and 23D);

Environmental mitigation

- two new flood compensation areas (Work Nos. 24A and 24B) and the provision of new ecological compensation and mitigation areas (Work Nos. 25 and 26) and two new environmental ponds (Work Nos. 27 and 28);

Utilities

- diversion of an already underground high pressure gas pipeline and diversion underground of an existing overhead electric line (Work Nos. 29 and 30); and

Accommodation works

- accommodation works to provide replacement facilities for Maylands Golf Course (Work No. 32). The Scheme layout entails the creation of the new two-lane loop road and new bridges over the connecting slip roads and watercourses.

- 1.4.2 The above should be read in conjunction with Works plans (application document TR010029/APP/2.3) and Schedule 1 of the Development Consent Order (application document TR010029/APP/3.1). Further details on the Scheme are provided in Chapter 2 of the ES (application document TR010029/APP/6.1):

1.5 Statutory consultation

- 1.5.1 This Scheme is categorised as a Nationally Significant Infrastructure Project (NSIP) under sections 14(1)(h) and 22 of the PA 2008. Under section 22, a highways NSIP must fall within one of the three categories specified. The Scheme is an ‘alteration’ within the meaning of section 22(1)(c) and the area of development is greater than the prescribed threshold.
- 1.5.2 As the Scheme is an NSIP, a certain level of consultation is required as prescribed by Part 5, Chapter 2 (Pre-application procedure) of the PA 2008 and in the former Department for Communities and Local Government (DCLG) “Planning Act 2008: Guidance on the Pre-Application Process” (updated in March 2015).
- 1.5.3 This includes a duty to inform and engage statutory consultees, landowners, local authorities, members of the public, and other non-statutory consultees. Section 49 requires the Applicant have regard to the consultation responses when developing the Scheme.
- 1.5.4 Section 42 of the PA 2008 requires the Applicant to consult with:
- prescribed consultees (section 42(1)(a))
 - relevant local authorities (section 42(1)(b))
 - the Greater London Authority (GLA) (section 42(1)(c))
 - landowners, those with an interest in the land and those who would or might be entitled to make a relevant claim (section 42(1)(d))
- 1.5.5 This consultation is outlined in **Chapter 5** of this report.
- 1.5.6 Section 47 of the PA 2008 requires the Applicant to prepare a statement (SoCC) setting out they will consult with the local community, which is defined as ‘people living within the vicinity of the land’. For the Scheme this was defined as people living and working within an approximately one-mile radius of the Scheme³, referred to throughout the remainder of this report as “the consultation target area”. Section 47 also requires the consultation to be undertaken in accordance with the prepared SoCC. Further details of the SoCC, and how consultation was held in accordance with it, can be found in **Chapter 6** of this report.
- 1.5.7 Section 48 of the PA 2008 requires the Applicant to publicise the proposed application in the prescribed manner in national and regional newspapers as set out in Regulation 4 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations). Further details about the steps taken by the Applicant to publicise the proposed application can be found in **Chapter 7** of this report.
- 1.5.8 Guidance on the Pre Application Process (March 2015), published by the former DCLG has been complied with in delivering the consultations outlined in this report, in line with the requirements of section 50 of the PA 2008. The Applicant has also

³ The one-mile radius was assumed as it broadly covered the area covered by the red line boundary plus a 500 metre buffer around this (green line boundary).

approached consultation in accordance with guidance published by the Inspectorate, Advice Note Fourteen (Compiling the Consultation Report), and the Applicant's own guidance, *How Highways England Plans Major Schemes*. Further information about the delivery of pre-application consultation for the Scheme can be found in **Chapters 3, 5, 7, 9 and 10** of this report.

1.6 Programme of engagement and consultation

1.6.1 Simple and efficient communication with all stakeholders was essential throughout the development of the Scheme. A series of consultations were undertaken to inform the development of the Scheme. The dates and contexts of all consultations were:

- **2016-17:** Options consultation was undertaken between 14 November 2016 and 6 January 2017. The PRA was made in August 2017.
- **2018-19:** Following the PRA, a statutory consultation (in accordance with sections 42, 47 and 48 of PA 2008) was undertaken between 3 December 2018 and 28 January 2019 (an extension to the consultation was made to 28 February 2019 to give newly identified consultees the opportunity to provide feedback on the proposals)
- **2019:** A supplementary consultation was undertaken between 4 November and 2 December 2019, to consult on proposed design changes and newly identified impacts, both of which had arisen since statutory consultation.
- **2020:** A targeted consultation was undertaken between 31 January and 27 February 2020 to consult with three consultees who were impacted by proposed changes to the Scheme's red line boundary.

1.6.2 The pre-application consultation activities are summarised in Table 1.6.1.

Table 1.6.1: Summary of consultation activities

Consultation activity undertaken	Date	Report reference
Options consultation	14 November 2016 to 6 January 2017	Chapter 3
PRA	22 August 2017	Paragraph 3.7.14
SoCC consultation with local authorities in accordance with section 47 of the PA 2008	5 October to 4 November 2018	Chapter 6
Statutory consultation under section 42 of the PA 2008	3 December 2018 to 28 January 2019 (extension to consultation to 28 February 2019)	Chapter 5
Consultation with the local community in accordance with section 47 of the PA 2008	3 December 2018 to 28 January 2019	Chapter 7
Statutory consultation under section 48 of the PA 2008	3 December 2018 to 28 January 2019	Paragraph 7.7.1
Engagement and changes taken place since statutory consultation and up to supplementary consultation	February 2019 to November 2019	Chapter 8
Supplementary consultation	4 November to 2 December 2019	Chapter 9
Targeted consultation	31 January to 27 February 2020	Chapter 10

1.7 Environmental Impact Assessment (EIA)

- 1.7.1 Due to the size and potential for significant environmental impacts, the Scheme was identified by the Applicant as an “EIA project” pursuant to the EIA Regulations, which transposed the 2014 amended EIA Directive into UK law and came into force in May 2017.
- 1.7.2 Accordingly, a detailed EIA has been carried out for the Scheme, leading to preparation of an Environmental Statement (ES) to accompany the DCO application. There have been various consultation activities undertaken in connection with the EIA as outlined in the following paragraphs.
- 1.7.3 On 10 November 2017, by means of a letter to the Inspectorate, the Applicant notified the SoS under Regulation 8(1)(b) of the EIA Regulations that an ES would be prepared and submitted alongside the DCO application. A copy of the letter is included in **Annex A**. At the same time, a request for a Scoping Opinion (SO) was

made under Regulation 10(1) of the EIA Regulations and in accordance with Regulation 10(3) of the EIA Regulations, an EIA Scoping Report was submitted to the Inspectorate and provided:

- A plan to identify the land
- A description of the proposed development, including its location and technical capacity
- An explanation of the likely significant effects of the development on the environment

- 1.7.4 A copy of the Applicant's EIA Scoping Report is submitted in support of this Application (application document TR010029/APP/6.10).
- 1.7.5 Regulation 10(6) of the EIA Regulations prescribes that the SoS must not adopt a SO until the SoS has consulted the appropriate consultees. Regulation 11(1)(b) states that the SoS must inform the Applicant in writing of the names and addresses of the consultees, so notified. In addition, Regulation 11(1)(c) requires the SoS to notify Applicant in writing of any particular person whom it considers:
- i. to be or likely to be, affected by, or to have an interest in the proposed development
 - ii. to be unlikely to become aware of the proposed development by means of the measures taken in compliance with Part 5 (applications for orders granting development consent) of the Act (i.e. the pre-application requirements under PA 2008).
- 1.7.6 On behalf of the SoS, a Scoping Opinion was provided (application document TR010029/APP/6.10) by the Inspectorate on 20 December 2017. Appendix 1 of the Scoping Opinion provided a list of all bodies with whom the Inspectorate formally consulted, on behalf of the SoS, on the EIA Scoping Report under Regulation 11(1)(b). This included the prescribed consultation bodies as listed within Schedule 1 of the APFP Regulations, statutory undertakers and local authorities as defined by section 42 of the PA 2008. This list informed the identification of prescribed consultees for the statutory consultation. Appendix 2 of the Scoping Opinion contained the responses received from those consultees that responded within the statutory 28 day period, as per Regulation 10(11). Late responses from the EA and London Borough of Bexley were also published on the Inspectorate's website. These responses have been taken into account in the development of the PEIR (see below) and ES. In accordance with Regulation 12 of the EIA Regulations, the SoCC explained that the Scheme constituted EIA development and set out how the Applicant intended to consult on the PEIR.
- 1.7.7 The Inspectorate's Advice Note Seven (Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping) (republished in December 2017) recommends that Preliminary Environmental Information (PEI) is prepared by the Applicant. The PEI is documented in a Preliminary Environmental Information Report (PEIR).
- 1.7.8 The PEIR prepared for the Scheme supported the statutory consultation undertaken in December 2018 and January 2019. It provided details of the Scheme at the preliminary design stage, its environmental effects, timescales for delivery, the alternatives considered, and uncertainties. Also, during the statutory consultation specialist environmental staff were available at the public exhibitions to answer any questions on environmental issues. The responses to the

statutory consultation on environmental issues have been taken into account by the Applicant in developing the Scheme further as detailed in **Chapters 4 and 8**.

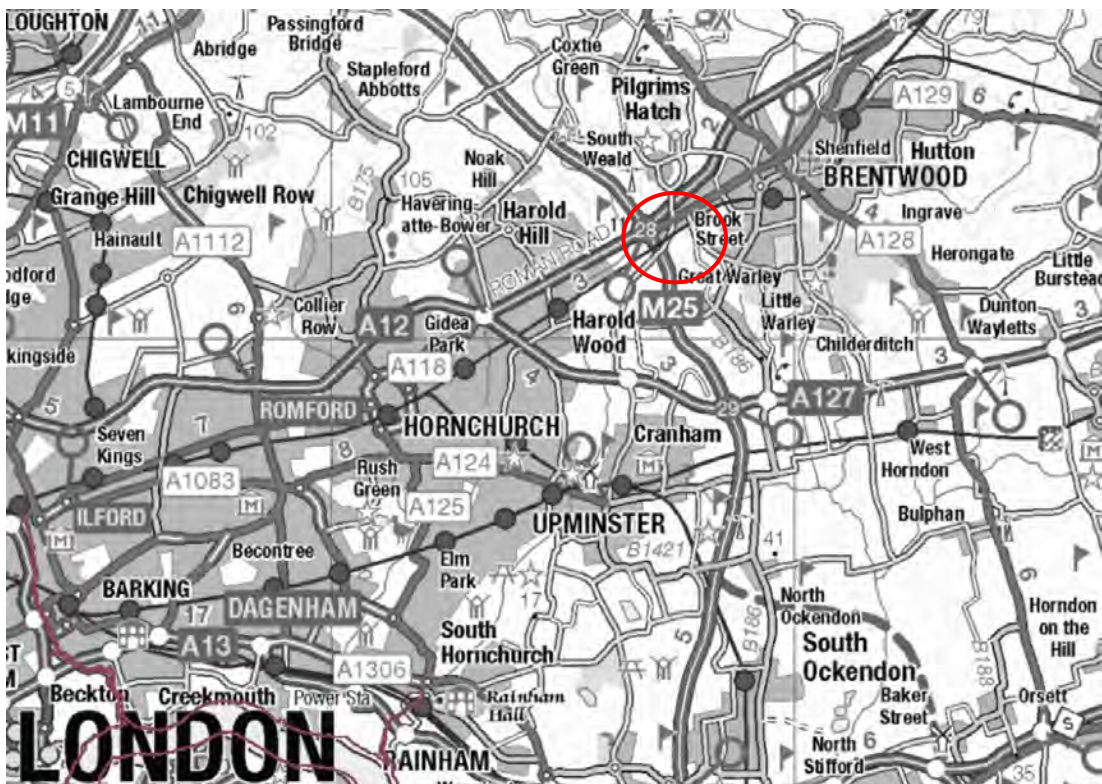
- 1.7.9 Throughout the development of the Scheme, there has been a number of meetings with stakeholders, including local authority officers and statutory environmental bodies, to discuss environmental issues and inform the proposed design and mitigation comprised within the Scheme, as outlined in **Chapter 4** and **Chapter 8**.

2 Background to the Scheme

2.1 Scheme location

- 2.1.1 The Scheme is located between Brentwood and Romford in Essex in Essex (Figure 2.1.1). It falls within the administrative areas of the London Borough of Havering (LB Havering) and Brentwood Borough Council (Brentwood BC) along with the Greater London Authority (GLA) and Essex County Council (Essex CC).
- 2.1.2 Junction 28 provides the intersection between the M25 motorway, the key trunk route of the A12 and the A1023, providing connectivity between London, Chelmsford, Ipswich and Brentwood and other key destinations across the south-east of England. The junction caters for several dominant movements particularly between the M25 motorway and the A12 towards Essex.

Figure 2.1.1: Scheme location



2.2 Key environmental context

- 2.2.1 An overview of the key environmental constraints for the Scheme is outlined below and set out in Chapter 2 of the ES (application document TR010029/APP/6.1).
- 2.2.2 The Scheme is located in a predominantly rural setting in a narrow strip of Green Belt between the edge of the settlements of Brentwood and Harold Wood.
- 2.2.3 Brentwood BC has declared three Air Quality Management Areas (AQMAs). The Scheme is partially located within AQMA No. 2 which comprises parts of Brook Street, Brentwood and the A12.
- 2.2.4 The LB Havering has also declared a borough wide AQMA and the Scheme is partially within this AQMA. Monitoring by the Department for Environment, Food

and Rural Affairs (Defra) recorded elevated nitrogen dioxide (NO₂) concentrations on the A12.

- 2.2.5 There are several noise important areas (NIAs) within the local area (noise hotspots), with one centred on junction 28.
- 2.2.6 There are eight Grade II and II* Listed Buildings within the vicinity surrounding the Scheme. The Nags Head is a Grade II Listed Building located 600 m along Brook Street to the east of junction 28. The Golden Fleece Inn and the Moat House (Grade II*) are located 1 km to the east of junction 28. Weald Park is a Registered Park and Garden located 800 m to the north of the junction.
- 2.2.7 There are no designations for landscape quality but there are several Ancient Woodlands around junction 28. Lower Vicarage Wood and Vicarage Wood are both designated Ancient Woodland and located approximately 400 m and 800 m respectively to the north east from the junction. The Manor Local Nature Reserve (LNR) is located approximately 1 km to the north west of junction 28. The Ingrebourne Valley Site of Metropolitan Importance (SMI)⁴ is located directly west of junction 28.
- 2.2.8 Fifteen veteran trees have been identified within the Scheme's red line boundary.
- 2.2.9 The area surrounding the junction is Grade 3 Agricultural Land Classification (ALC) and there is a former landfill site immediately to the north west of junction 28, situated within the landholding known as Grove Farm.
- 2.2.10 Two waterbodies cross the area, the Ingrebourne River which flows adjacent to A12 and the Weald Brook which flows north to south to the west of the M25 and both have associated fluvial flood plains.
- 2.2.11 Five ponds have been identified within the vicinity of the Scheme and Great Crested Newts (GCN) have been confirmed to be present in four of these ponds.

2.3 Existing situation

- 2.3.1 Junction 28 plays a key role connecting the M25 with the A12 trunk road, as well as providing local access to Brentwood via the A1023 (Brook Street). Traffic analysis of the existing movements through the junction has been set out within the Transport assessment report (TA) (application document TR010029/APP/7.4). This analysis indicates that there are four dominant movements through junction 28, namely between the M25 northbound and southbound carriageways and the A12 east (facing Essex in both directions).
- 2.3.2 Currently junction 28 is a heavily used junction which features a roundabout controlled by traffic lights and it is used by up to 7,500 vehicles in an hour during peak times. The junction is already operating at capacity, with motorists regularly experiencing congestion and delays. By 2037, traffic levels in the area are expected to increase by up to 22% by 2037, with more than 9,000 vehicles travelling through the roundabout every hour at peak times. Average delay due to congestion during peak travel times is predicted to increase by at least three times from over a minute per vehicle at present, to four minutes per vehicle in 2037 under Do Minimum conditions (that is without the Scheme).

⁴ Non-statutory designated sites in Greater London are known as Sites of Importance for Nature Conservation (SINCs). These are categorised as Site of Metropolitan Importance (SMI), Sites of Borough Importance Grade I (SMI I), Sites of Borough Importance Grade II (SMI II) and Sites of Local Importance (SLI).

- 2.3.3 Traffic modelling has been undertaken to replicate current traffic demand and conditions at junction 28, and to predict how these might change in the future. The traffic modelling shows that without intervention, there will be further deterioration in traffic conditions at junction 28 :
- Delays will be at least three times greater than currently experienced
 - Average speeds will be reduced by 25%
- 2.3.4 As stated above, the roundabout caters for traffic accessing Brentwood via the A1023 (Brook Street). While the roundabout is signalised, the Brook Street approach to the roundabout is the only one not currently controlled by traffic lights. Brook Street is not part of the Applicant's SRN and it is owned and maintained by Essex Highways.
- 2.3.5 Current accident records show that 27 injury accidents were reported (on the roundabout and the adjoining slip roads over the five year period to December 2017). This figure does not include damage only collisions, which are often unreported. The 27 accidents have resulted in 36 casualties of which 33 were slight injuries (90%) and 3 serious. The level of killed and serious injury (KSIs) incidents is low with less than one KSI each year. As well as harm and injury, a key concern of the occurrence of these incidents on junction 28, together with the unreported damage only events, relates to the traffic disruption these cause across the wider highway.
- 2.3.6 The objectives of the Scheme are to reduce congestion and delays, as well as improve journey time reliability through the junction during peak and off-peak periods. The Scheme would address safety issues, reducing the high occurrence of accidents. One of the objectives of the Scheme is to '*cater for future traffic demands to enable development and economic growth*'. Further details on how the Scheme has been developed to take account of development and economic growth can be found in the Transport assessment report (application document TR010029/APP/7.4).

2.4 Scheme history

- 2.4.1 In December 2014 the Department for Transport (DfT) published its Road Investment Strategy⁵ (RIS) for 2015 to 2020, announcing £15 billion to invest in England's SRN between 2015 – 2020.
- 2.4.2 RIS set out the list of schemes to be delivered by the Applicant over the period covered by the RIS (2015 – 2020). The Applicant responded to the RIS with the Highways England Delivery Plan (2015) and a number of schemes were identified to be constructed within the plan period, including the improvement of junction 28. On 11 March 2020 the DfT published its second Road Investment Strategy⁶ which continued to list the Scheme as a committed project.
- 2.4.3 An evidence review was undertaken in 2015 and four key problems were identified to exist at junction 28:
- Problem one – congestion and delay on the junction 28 roundabout disrupts journeys on the SRN and local roads.
 - Problem two – actual and perceived safety concerns associated with driver movements on the junction 28 roundabout.

⁵ Road Investment Strategy: 2015 to 2020, Department for Transport, December 2014

⁶ Road Investment Strategy: 2020 to 2025, Department for Transport, March 2020

- Problem three – resilience to incidents or accidents is poor, resulting in significant disruption and unreliable journey times.
- Problem four – air quality is an issue at the junction.

2.5 Scheme objectives

2.5.1 In 2015, the objectives for the Scheme were then developed with local authorities and in order to address the problems that had been identified at junction 28. The Scheme objectives are:

- To increase capacity and reduce congestion and delays by providing an improved link from M25 to A12.
- To reduce the incident rate and resulting disruption by increasing the capacity of the roundabout.
- To improve safety on the roundabout by reducing traffic levels and redesigning the existing layout.
- To cater for future traffic demands to enable development and economic growth.
- To minimise the impact on local air quality and noise by smoothing traffic flow.
- To protect access for non-motorised users (pedestrians and cyclists) and improve conditions wherever possible.

2.6 Development of the Scheme options

2.6.1 A staged approach was employed in developing options for the Scheme, and ultimately identifying a single preferred option.

2.6.2 Having identified that there was a transport issue at junction 28, the Applicant had to identify how best to address this problem. To achieve this a number of strategic options were initially identified, providing high-level consideration to a range of alternative strategies that might address the identified problems. These comprised:

- Do minimum
- Alternative modes of transport including – bus
- Alternative modes of transport including – rail
- Demand management
- Highway improvements
- Reclassification of the wider strategic road network

2.6.3 Based on an assessment of these strategic options, the highway improvements-based strategy was confirmed to be most strongly aligned with addressing the local problems identified, meeting the Scheme objectives, and achieving delivery within the RIS programme. The key factors for discounting the other strategies are summarised below:

- The do-minimum only addresses safety concerns and will do little to improve the operational capacity of the junction. Safety issues would be expected to deteriorate in the future with this option
- The bus and rail based strategies would be focussed on attracting radial London bound passenger trips, whereas the majority of trips travelling through the junction 28 gyratory are orbital in nature travelling between A12 Essex bound and the M25 to the north and

south. Hence, it would be difficult to encourage a significant mode shift through public transport for these journeys travelling through junction 28.

- The demand management strategy on its own would only slightly reduce traffic flows travelling through junction 28. Hence, this strategy would not have a significant impact on reducing congestion in the future on junction 28.
- The reclassification of the strategic network was discounted as it was deemed that it could not be delivered within the timescales to and give immediate affect to addressing the short and medium term problems.

2.6.4 Subsequently based on the preferred highways focused strategy and scope, a long-list of highway options were developed to give effect to the Scheme objectives. In total nine alternative highway based options were identified:

- Option 1 - a hamburger through-about (a type of road junction that connects several roads, but with one road passing above or below the junction)
- Option 2 - a northern loop
- Option 4 - a compact northern loop
- Option 3 - a satellite roundabout
- Option 5B - single lane loop road, and widening of existing M25 bridge over junction 28
- Option 5C - single lane loop road, and widening of short section of M25
- Option 5D and 5E - northern loops
- Option 5F - two-lane loop road, widening of short section of M25, and reconfiguration of A12
- Option 6 - a southern link
- Option 7 - a do-maximum (for example a double cloverleaf)

2.6.5 These options were assessed based on the expected impacts of achieving the Scheme objectives, indicative cost ranges, and key issues and risks relating to Scheme delivery. Based on this assessment the hamburger through-about and satellite roundabout options were discounted as they were assessed a low rating in terms of achieving the scheme objectives. The double cloverleaf option was also discounted as it offered low value for money.

2.6.6 The northern loop, compact northern loop, single cloverleaf (three variants) and the southern link were taken forward and assessed in more detail in terms of environmental impacts, traffic performance, economic assessments, and value for money against the Scheme objectives. Consideration was also given to identified constraints, risks, affordability and deliverability. Following detailed assessment, three options were short-listed for further development and options consultation. The three short-listed options comprised Options 5B, 5C and 5F.

2.6.7 Further information on the option selection process can be found in Chapter 3 (assessment of alternatives) in the ES (application document TR010029/APP/6.1).

2.6.8 Each of the three short-listed options (Options 5B, 5C and 5F) set out to divert traffic away from the roundabout via a cloverleaf type link road between the M25 northbound and the A12 eastbound. These options are summarised below.

2.6.9 Option 5B: Single lane loop road, widening the existing M25 bridge over junction 28 (Figure 2.6.1).

- Create new single lane loop road, with hard shoulder, for traffic travelling from the M25 northbound to the A12 eastbound.
- Provide an overbridge with the realigned A12 eastbound exit slip road to allow the proposed loop road to pass under to join the A12 carriageway.
- Works on A12 eastbound to maintain existing access to Maylands Golf Club.
- Reconfigure the A12 road markings to allow the new loop road to join the A12 and accommodate two-lanes through the junction.
- Widen M25 carriageway overbridge to accommodate a new exit road.

Figure 2.6.1: Option 5B, single lane loop road, with widening of the M25 bridge



2.6.10 Option 5C: Single lane loop road (Figure 2.6.2).

- Provide a bridge over the M25 northbound entry slip road to facilitate new loop road. Create new single lane loop road with hard shoulder, for traffic travelling from the M25 to the A12.
- Provide an overbridge with the realigned A12 eastbound exit slip road to allow the proposed loop road to pass under to join the A12 eastbound carriageway.
- Works on A12 eastbound to maintain existing access to Maylands Golf Club.
- Reconfigure the A12 road markings, including the eastbound entry slip road, to allow the new loop road to join the A12 and accommodate two-lanes through the junction.
- Use existing hard shoulder on the M25 northbound carriageway to provide proposed exit road.

Figure 2.6.2: Option 5C, single lane loop road



2.6.11 Option 5F: Two-lane loop road (Figure 2.6.3).

- Create new two-lane loop road with hard shoulder, for traffic travelling from the M25 to the A12.
- Works on A12 eastbound to maintain existing access to Maylands Golf Club.
- Provide an overbridge with the realigned A12 eastbound exit slip road to allow the proposed loop road to pass under to join the A12 eastbound carriageway.
- Reconfigure A12 to accommodate two-lanes joining the A12 eastbound from the proposed loop road.
- Widen the M25 northbound carriageway to provide proposed exit road. Provide a bridge over the M25 northbound entry slip road to facilitate the new loop road which passes under it.

Figure 2.6.3: Option 5F, two-lane loop road



3 Options consultation 2016

- 3.1.1 Having shortlisted three options, the Applicant conducted an options consultation for approximately eight weeks (54 days) between 14 November 2016 and 7 January 2017. This was to inform and seek the views of various interested parties and stakeholders, as well as to gauge public opinion on the three shortlisted options. This options consultation was not a statutory consultation under the PA 2008.

3.2 Who was consulted

- 3.2.1 A scoping exercise was undertaken by the Applicant to identify consultees that may have an interest in the Scheme. A list of stakeholders was developed, contact details ascertained and used to create the Scheme stakeholder database. Stakeholders were grouped by their status, for example 'local authority' or 'landowner'. The database was then used to refine which engagement tools and approach should be used for each stakeholder group.
- 3.2.2 A summary of the stakeholder groups is identified below:
- Elected representatives whose constituents live or work in the vicinity of the Scheme – including two MPs in the area and all elected councillors from the local authorities listed below.
 - Local authorities – the LB Havering, Brentwood BC, Essex CC and Transport for London (TfL).
 - Environmental bodies – the Environment Agency (EA), English Heritage, Natural England and the Forestry Commission (FC).
 - Landowners and occupiers – two landowners (Glebelands Estates Limited and Grove Farm), were identified using initial land registry information available at that time, and Maylands Golf Club.
 - Emergency services – fire, police and ambulance.
 - Local and national interest groups and organisations – cycling and walking groups, transport operators including freight and recovery services.
 - People who live in the vicinity of the Scheme – a consultation target area was identified, extending approximately one-mile around junction 28. This contained 28,000 residential addresses.
- 3.2.3 For a full list of the identified stakeholders please see **Annex B1**.

3.3 Consultation materials

- 3.3.1 The Applicant prepared consultation materials to enable stakeholders to have a clear understanding of the problems faced at the junction, each of the options being consulted on and how feedback could be provided. The materials provided were as follows:
- **A Consultation questionnaire (Annex B2)** – setting out the specific questions to gain feedback, including; which option was preferred, comments on the options, as well as views on how each option addressed the key issues and objectives relating to congestion, safety, network resilience to accidents and incidents, and air and noise quality.

- **A Consultation brochure (Annex B3)** – with concise information about the Scheme, including its background, a summary of the three options and their impacts and benefits. Key environmental considerations in respect of the options were presented in the consultation brochure.
- **A Scheme dedicated webpage** – www.highways.gov.uk/m25j28 (please note this website domain no longer exists and has been replaced with www.highwaysengland.co.uk/m25j28 <https://highwaysengland.co.uk/projects/m25-junction-28-improvements/>) that also contained copies of all the consultation material and details of public consultation exhibitions.
- **A Technical Appraisal Report⁷** – detailing the identification, assessments and sifting of the Scheme options to determine which should be taken forward to the options consultation.
- **A 3D visualisation** of the three short-listed options was also added to the webpage and made available at all public consultation exhibitions.

3.4 Consultation channels

- 3.4.1 **Six public consultation exhibitions** were held during the consultation period at which there were exhibition boards (**Annex B4**) presenting information about the proposed options for the Scheme, as well as all other consultation materials listed above. In total 322 people attended these events. Details of the exhibitions are listed in **Table 3.5.1**.
- 3.4.2 Ahead of the start date for the consultation, all stakeholders were sent letters which included information on; the consultation dates, details of public consultation exhibitions, where the brochure and questionnaires could be collected from, the Scheme webpage and how to feedback. Copies of these letters are provided at **Annex B5**.

3.5 Publicising the consultation

- 3.5.1 Adverts were placed in both the Romford Recorder and the Brentwood Gazette in the week that the consultation was launched (**Annex B6**).
- 3.5.2 A press release was issued to the local media and they were invited to attend a briefing session on 17 November 2016.
- 3.5.3 In addition, a separate briefing session was organised on the same day (prior to the media briefing) for key stakeholders including local authorities, environmental bodies and landowners.
- 3.5.4 Brochure and questionnaire collections points were set up to help raise awareness and interest in the consultation and encourage people to provide their views. Copies of the consultation brochures and questionnaires were made available for collection at the following three locations throughout the consultation period, and posters (**Annex B7**) were also displayed at these locations to publicise the consultation:
- Central Romford library, RM1 3AR
 - Brentwood library, CM14 4BP
 - Shenfield library, CM15 8NJ.

⁷ Available on Scheme webpage <https://highwaysengland.co.uk/projects/m25-junction-28-improvements/> under 'Consultation 2018-19'

Table 3.5.1: Public consultation exhibitions held within the local community

Date	Location	Number of attendees
Thursday 17 November 2016 2.30pm to 6pm	Harold Hill community centre Goosehays Drive, Harold Hill Romford RM3 9LB	27
Friday 18 November 2016 10am to 4pm	Harold Hill community centre Goosehays Drive, Harold Hill Romford RM3 9LB	24
Friday 9 December 2016 2pm to 8pm	South Weald parish hall 85 London Road Brentwood CM14 4NP	97
Thursday 15 December 2016 10am to 4pm	Harold Wood neighbourhood centre The Old School, Gubbins Lane Harold Wood Romford RM3 0QA	28
Wednesday 4 January 2017 6.30pm to 10pm	Holiday Inn Brentwood CM14 5NF	44
Thursday 5 January 2017 11am to 9pm	Holiday Inn Brentwood CM14 5NF	102

3.6 Feedback mechanisms

3.6.1 Throughout the consultation period, feedback was invited through a range of channels:

- Completing and handing in a hard copy questionnaire at one of the public consultation exhibitions or returning them by post using the freepost address: FREEPOST M25 junction 28 improvement scheme.
- Completing and submitting the response form online at: www.highways.gov.uk/m25j28.
- Downloading the response form on the Scheme webpage, completing it and sending it by email to info@highwaysengland.co.uk.
- Contacting the Applicant at info@highwaysengland.co.uk or telephoning 0300 123 5000.

3.7 Summary of feedback

3.7.1 A total of 267 responses were received comprising:

- 145 online questionnaires
- 83 hard copy questionnaires

- 39 responses to the customer contact centre
- 3.7.2 The responses included four long written responses from Essex CC, LB Havering, Brentwood BC and MP Will Quince (constituency Colchester).
- 3.7.3 The majority of respondents:
- agreed there was a need to improve M25 junction 28 (92%)
 - confirmed that they currently experience unpredictable journey times (79%)
 - confirmed that they travel by car through the junction (96%)
- 3.7.4 The respondents' highest levels of concern related to congestion (96%), road safety (82%) and limited capacity (80%).
- 3.7.5 While most respondents indicated they travelled during off-peak hours (77%) and weekends (70%), over a third travelled through at peak times on a weekday (41% at pm peak and 36% at am peak).
- 3.7.6 Of the three options, Option 5F had the greatest support, including from the local authorities. The reported preference for each option from respondents was as follows:
- Option 5F (49%)
 - No preference stated (18%)
 - Option 5B (17%)
 - Option 5C (12%)
 - Question not answered (4%)
- 3.7.7 Respondents were also given the opportunity to make open comments about the three options presented. The following paragraphs provide an overall summary of the responses provided for each option.
- 3.7.8 **Option 5B** drew some positive comments because of its lower cost compared to the other options and reduced footprint. However, some criticised it for being a short-term solution, the impact it would have on Grove Farm and the widening of the existing M25 overbridge.
- 3.7.9 **Option 5C** received some positive comments, primarily relating to its value for money, while most of the negative comments perceived it to be a short-term solution and that it wouldn't be able to keep up with future growth.
- 3.7.10 **Option 5F** was given the most positive, and least negative comments. Most of the positive comments focused on this option's ability to improve capacity and offer a better long-term solution. Negative comments relating to Option 5F were concerned with the fact that it cuts through some woodland, and that given its size motorists might still use the roundabout.

Table 3.7.1: Key topics raised by consultees from options consultation and actions taken by the Applicant

Element of the Scheme and topics raised in consultation	How the Applicant has had regard to the response received
A1023 current access and egress to the Brook Street roundabout is inadequate	The Applicant considered reviewing signal timings on the roundabout to improve access and egress with the A1023 Brook Street throughout the design process. This is particularly pertinent at the next stage of detailed design.
Congestion on A1023 Brook Street during peak travel times particularly at Nags Head Lane and Mascalls Lane traffic signals	The A1023 is not part of the Highways England SRN, but falls under the remit of Essex CC. The Applicant continued to liaise with Essex CC to ensure any future proposals for the A1023 are not prejudiced by the Scheme.
North of junction 28 the A12 current two-lanes is inadequate	The Applicant is undertaking separate investigations into the need for improving the A12 north of M25 junction 28 ; these are not within the scope of this Scheme which focuses only on improving junction 28.
Lane markings (improvement required on the roundabout)	The lane markings will be part of the Scheme and will developed as part of the detailed design process.
Additional left turn slip-roads at the roundabout (to ease movements to and from M25/A12/Brook Street)	This proposal was considered but not progressed because: <ul style="list-style-type: none"> the demand for the turns was not sufficient to justify the incremental investment. the dedicated lane would expose pedestrians and cyclists to additional safety risks. the dedicated lane would sever access to adjacent properties.

- 3.7.11 For further details on the options consultation, please refer to the Regional Investment Programme M25 junction 28 improvements Stage 2 report on public consultation (**Annex B8**).
- 3.7.12 Further environmental assessment of all three options was undertaken following the options consultation to inform the final option selection. All options had similar potential impacts in relation to air quality and noise, but Option 5B had an overall lower environmental impact than Options 5C and 5F, due to its smaller footprint.
- 3.7.13 Taking into account feedback from the consultation, as well as performance of the options in the assessment relating to traffic, design, environment, economics and social aspects, Option 5F was selected as the preferred route as the two-lane

configuration of this option offers the optimum solution in relation to catering for future traffic volumes, network resilience, maintenance requirements and avoiding disruption to traffic during construction. The reasons for rejecting options 5B and 5C are summarised in **Table 3.7.2**

Table 3.7.2: Rejected options

Option name and description	Reason for rejection
Option 5B – single lane loop road, widening existing M25 bridge over junction 28	<p>Involves a departure from standards relating to the sub-standard distance between the successive diverges on the M25 northbound carriageway. This presents a significant concern over the operational safety of road users.</p> <p>This single lane and its ability to cater for future traffic levels is not as strong relative to Option 5F which offers a two-lane loop road.</p> <p>The construction of Option 5B would involve significant works on the M25 requiring greater speed and lane width restrictions over long periods of time. This would have been very disruptive to many road users during construction.</p>
Option 5C – single lane loop road, widening short section of M25	<p>Similar to Option 5B. In addition, Option 5C offers a single lane loop road and its ability to cater for predicted traffic volumes in the future is not as strong relative to Option 5F which offers a two-lane loop road.</p>

- 3.7.14 On 22 August 2017, the Applicant issued its PRA confirming that it would proceed with the development of Option 5F.

4 Engagement between options consultation and statutory consultation

- 4.1.1 Following the options consultation (14 November 2016 to 6 January 2017), and leading up to statutory consultation (3 December 2018 to 28 January 2019), the Applicant continued to engage with key stakeholders. A variety of methods of communication were used as outlined in the following chapter. The principal purpose of this engagement was to provide updates on the progress of the design for the Scheme, to identify issues and discuss methods for resolving them.

4.2 Local authorities

- 4.2.1 On 11 and 12 April 2017, a value management workshop was held by the Applicant with internal and external stakeholders including LB Havering, Brentwood BC, Essex CC and TfL. This was a collaborative workshop to obtain views and assess the extent to which the three Scheme options would give effect to achieving the Scheme objectives, and to agree actions to improve the value of the Scheme. The feedback raised at these workshops informed the PRA.
- 4.2.2 In November 2017 a joint DCO knowledge event was held. The Applicant hosted a joint event with representatives from the M25 junction 10, A2 Bean and Ebbsfleet junction and the M25 junction 28 improvement project teams; local authority representatives of each project; and the London local authorities involved in the Tideway Tunnel DCO. The purpose of this was to raise awareness of the role of local authorities in the DCO process, as well as the issues likely to arise that they need to consider. For example, such issues included internal liaison, delegation powers and resourcing. Invitations were sent to all the host authorities for each of the above three schemes. For this Scheme, the event was attended by representatives from LB Havering, Essex CC and Brentwood BC.
- 4.2.3 Throughout the period from the options consultation until statutory consultation, there was also ongoing communication with the host authorities (LB Havering, Essex CC, GLA/TfL and Brentwood BC). This included a series of meetings to cover both general and specific issues. For example, on 13 June 2017 a meeting was held with Essex CC to discuss specific issues on realignment of the A12 (which subsequently led to a change to the Scheme as outlined in **Table 4.3.1**) and traffic signals on Brook Street and in January 2018 all authorities were given an update on the Scheme design, an outline of the response to their scoping issues and the planned statutory consultation. Letters were also sent to the host authorities on formal matters, for example, in December 2017 informing them of the postponement of the statutory consultation. Emails were sent in respect of discussions around technical issues, such as the verification of viewpoints, requesting information on the former landfill site within the Scheme boundary and requesting feedback on the SoCC.

4.3 Persons with Interest in Land (PiLs)

- 4.3.1 The Applicant continued to meet (on a one-to-one basis) and engage with landowners directly affected by the Scheme, including Glebelands Estates Limited and Grove Farm residents.

- 4.3.2 This included a meeting with Grove Farm held on 28 September 2017 to discuss maintaining their access and an on-site walk over to review the extent of the highway, where the highway alignment had been marked out by surveyors prior to meeting. A further meeting was held on 13 December 2017 following a request from Grove Farm for improved access. No further changes were made as like-for-like access arrangements could be provided.
- 4.3.3 During meetings held in 2017, Glebelands Estates Limited outlined the content and progress of their planning application for a burial ground within the Scheme's red line boundary.
- 4.3.4 On 29 November 2018 separate meetings were held with Grove Farm and Glebelands Estates Limited to outline the Scheme that was to be presented at statutory consultation and encourage them to respond to that consultation.

4.4 Utility companies

- 4.4.1 The Applicant also engaged with a number of utilities companies as follows:
- National Grid – there were ongoing meetings and discussions relating to the interactions between the Scheme and existing overhead electric lines. These meetings were critical to understanding National Grid's requirements, for instance as regards acceptable clearances between the overhead electric line and the Scheme, and how any issues could be mitigated.
 - Cadent – ongoing meetings discussed the interactions as between an existing high pressure gas pipeline and the Scheme. The Applicant sought agreement on any diversion or protection measures needed for the high pressure gas pipeline.
 - British Pipeline Agency (BPA) – there were ongoing meetings with BPA to manage the interaction between the Scheme and BPA's apparatus. Initial meetings and site visits were very helpful in establishing the exact location of the pipeline and understanding the general design requirements and process to mitigate the impacts of the Scheme.

4.5 Statutory environmental bodies

- 4.5.1 Engagement with the EA was undertaken and covered a range of topics. A series of meetings took place, for example, on 30 October 2017 there was a meeting to discuss the proposed crossing of the Scheme over the Ingrebourne River and Weald Brook and the impact on their associated floodplains and habitats which led to the Scheme changes as outlined in **Table 4.3.1**. On 20 November 2017 there was a meeting to discuss the historic landfill and approach to ground investigations.
- 4.5.2 Natural England was approached with a meeting request to discuss the proposed Scheme, timescale and environmental assessment undertaken to date in December 2017. No response was forthcoming.

4.6 Changes to the Scheme between options and statutory consultations

4.6.1 Option 5F was further developed between the options and statutory consultations and changes were made following the various stakeholder engagement meetings, as outlined in **Table 4.3.1**.

Table 4.3.1: Changes to Option 5F between options and statutory consultation

Topics raised	Stakeholder discussions	Change made or response to topic raised
Disruption during construction	Essex CC	An urban merge was introduced on the proposed link road to enable an alternative merge arrangement with the A12. In doing this the need to realign the A12 was avoided and thereby disruption particularly during construction avoided.
Concern regards effects on Water Framework Directive (WFD) objectives and compliance	EA	Culverts were changed to clear span bridges, where possible, in the northern part of proposed loop road. Also meanders were introduced in conjunction with realignment of A12 off-slip. Other river and water quality improvements were investigated, and appropriate measures agreed with the EA.
Need to maintain access between adjacent plots of land to prevent severance	Glebelands Estates Limited	Consideration was given to maintaining clearance between the proposed loop road and Maylands Golf Course to enable continued access for Glebelands Estate. The radii of the loop road were reduced along with the access strip to minimise land take required from the golf course with a view to maintaining access.
Traffic modelling showing increased delays on Brook Street with Scheme in place	Essex CC	Options were examined to change the timings/setting of existing signals on roundabout. This included introducing a new set of signals on the roundabout at the Brook Street approach, however, initial assessments have indicated that this is not feasible. Going forward the mitigation proposed focusses on adjusting the settings for the existing traffic signals to reduce delays for traffic approaching from Brook Street.

Topics raised	Stakeholder discussions	Change made or response to topic raised
Prevent severance of land (and provide access for deer)	Grove Farm	Access is proposed below the northern part of the loop road to prevent severance.

4.7 Scheme proposals for statutory consultation

4.7.1 Option 5F was developed following feedback from the options consultation and through further ongoing stakeholder engagement. The Applicant then undertook consultation on the developed Option 5F in accordance with the PA 2008, as explained in chapters 5, 6 and 7 of this report.

4.7.2 The proposal presented as Option 5F at statutory consultation included the following key features:

- Creation of new two-lane loop road with hard shoulder, for traffic travelling from the M25 northbound to the A12 eastbound.
- Introduction of a second off slip road from the M25 northbound carriageway for traffic entering the new loop road.
- Provision of a new bridge to allow the new loop road to pass over the realigned M25 northbound on slip road.
- Provision of an overbridge to support the A12 eastbound off slip road to allow the proposed loop road to pass underneath and join the A12 eastbound carriageway.
- Reconfiguration of the lane markings and destination signing on the existing roundabout.

4.7.3 Four new bridges were proposed as follows:

- Bridge one allowed the proposed loop road to pass over the entry road to the M25 northbound carriageway. This structure was extended to enable access for farm vehicles, deer and other wildlife between adjacent fields.
- Bridge two carried the loop road over the Weald Brook. The span of this structure was designed to be wide enough to avoid any impacts to the natural course of the brook, and to provide a corridor for deer and other wildlife.
- Bridge three carried the loop road back across Weald Brook as it approached the A12. This structure was also be designed to accommodate adjacent design utilities.
- Bridge four was a longer span structure, required to carry the A12 eastbound off slip road over the proposed loop road and the Weald Brook, before joining the roundabout.

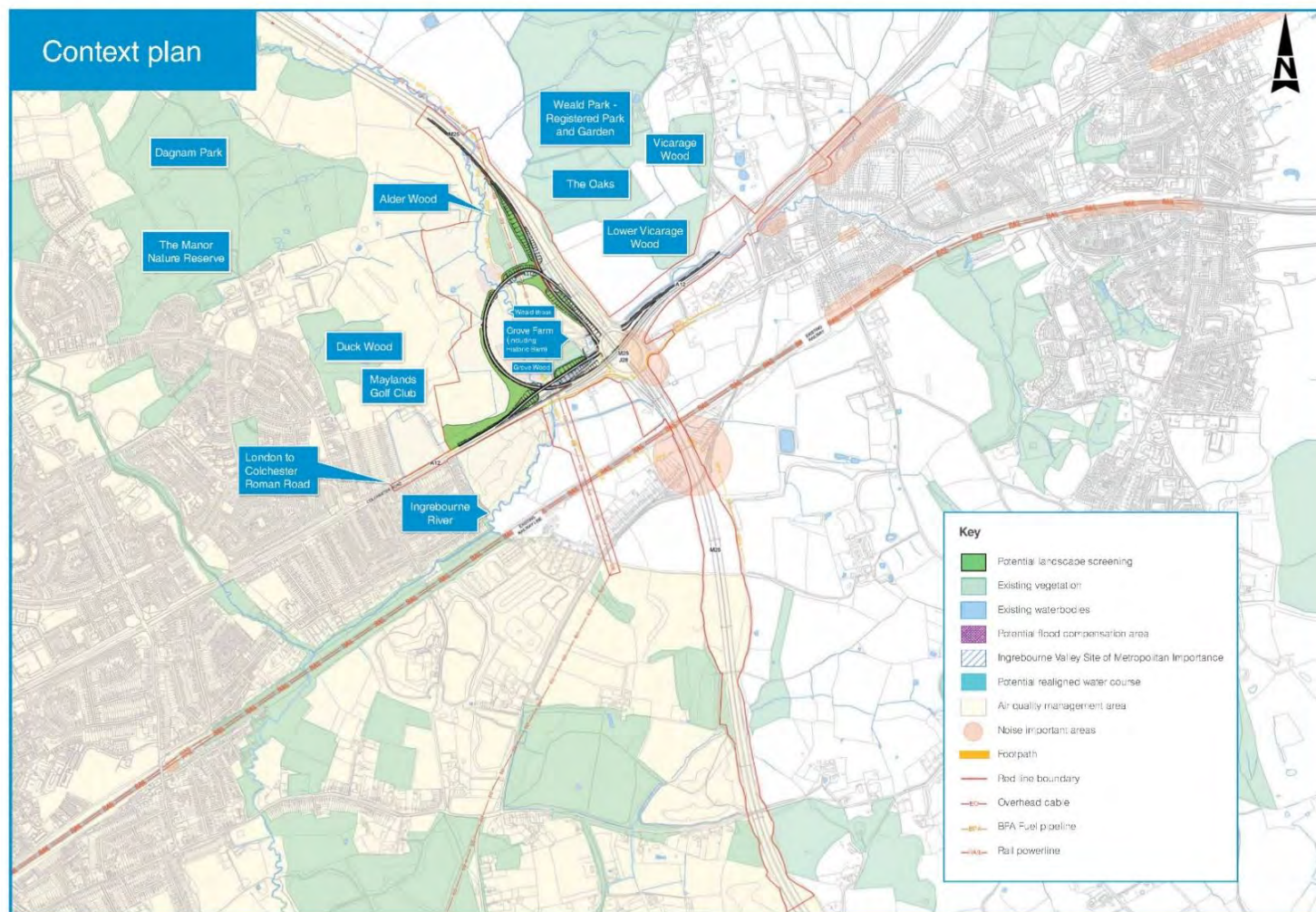
4.7.4 A copy of the proposed Scheme as it stood at statutory consultation is shown in the:

- Scheme context plan (showing the red line boundary) see Figure 4.6.1
- Scheme plan (showing the proposal) see Figure 4.7.2.

Figure 4.7.1: Scheme context plan (showing the red line boundary)



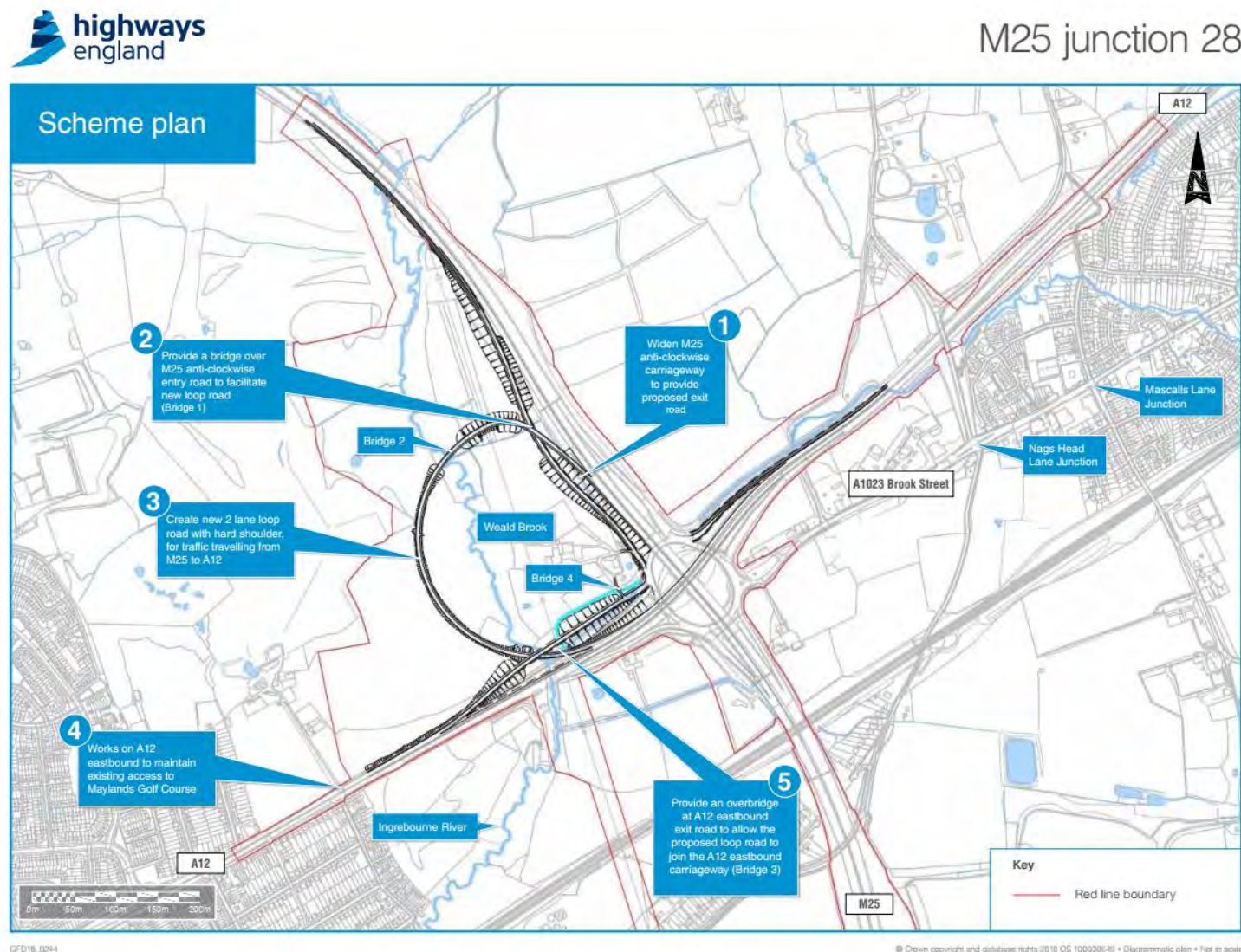
M25 junction 28



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© Crown copyright and database right 2018 OS 100039040 • Topographic map • Not to scale

Figure 4.7.2: Scheme plan



5 Consultation with statutory consultees (section 42)

5.1 Introduction

- 5.1.1 The Applicant undertook statutory consultation on the proposed Scheme over an eight week period between 3 December 2018 and 28 January 2019 (56 days). This chapter sets out the activities that the Applicant undertook to comply with the requirements of the PA 2008 and associated legislation and guidance.
- 5.1.2 The consultation not only sought peoples' views, preferences and ideas on the Scheme design, but also sought feedback on the PEIR, which had been compiled for the Scheme.
- 5.1.3 A 28 day extension to the statutory consultation, under section 42, was applied (this ended on 28 February 2019) for two specific groups of consultees:
- Previously unidentified Persons with Interest in Land (PiLs) who responded to the Land Interest Questionnaire (LIQs) after the consultation had started.
 - Two section 42(1)(b) consultees (Epping Forest District Council and Hertfordshire County Council) to whom the consultation materials were re-issued by post following their original statutory consultation notification by email being returned as 'undeliverable'.

5.2 Section 46 (notifying the Inspectorate)

- 5.2.1 On 29 November 2018 the Applicant wrote to the Inspectorate and gave formal notification under section 46 of the PA 2008 of its intention to submit a DCO application for the Scheme. The letter also advised the Inspectorate that statutory consultation, under section 42 of the PA 2008, would commence on 3 December 2018 and run through to 28 January 2019. The letter was accompanied by a USB stick containing the consultation materials. A copy of that letter is provided in **Annex C1**.

5.3 Who was consulted

- 5.3.1 Section 42 consultees as prescribed by the PA 2008 include the following:
- Consultees as prescribed by Regulation 3 of, and Schedule 1 to, the APFP Regulations
 - Local authorities (within section 43 of the PA 2008) and GLA
 - PILs (as defined by the section 44 of the PA 2008).
- 5.3.2 The following sections give details of how each of these consultees were involved in the statutory consultation.

5.4 Prescribed consultees

- 5.4.1 Consulting with prescribed consultees is a requirement under section 42(1)(a) of the PA 2008. A list of prescribed consultees is provided in Schedule 1 of the APFP Regulations. This was cross referenced with the list of prescribed consultees provided by the Inspectorate in response to regulation 11(b) of the EIA Regulations to ensure that the full range of consultees were captured.

- 5.4.2 A full list of the prescribed consultees that were sent notification of the statutory consultation can be found in **Annex C2**.

5.5 Local authorities

- 5.5.1 Section 42(1)(b) of the PA 2008 requires consultation with local authorities. Only local authorities within section 43 need to be consulted. These are ‘*host*’ authorities (category B and C as set out in section 43) where the proposed application lies and bordering ‘*neighbouring*’ authorities (categories A and D as set out in section 43).
- 5.5.2 **Table 5.5.2** provides a full list of the relevant local authorities for the Scheme.
- 5.5.3 As the Scheme falls within Greater London, the GLA was sent a formal notification of the statutory consultation, on 30 November 2018, in accordance with section 42(1)(c) of the PA 2008.
- 5.5.4 **Figure 5.5.1** shows the geographical location of the local authority consultees with the Scheme.

Table 5.5.2: Identification of relevant local authorities

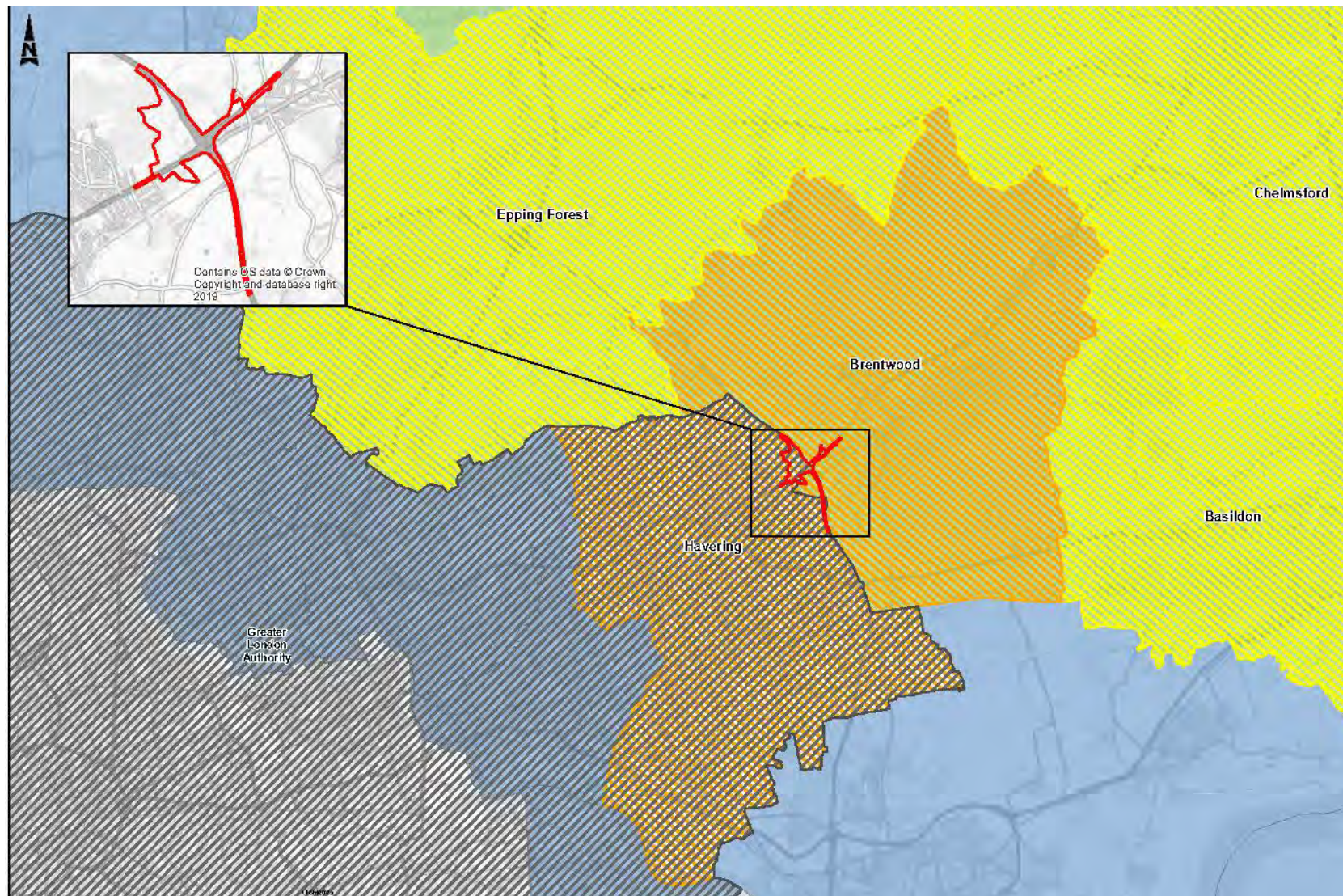
Name	A, B, C or D authority	Criteria for identification
<ul style="list-style-type: none"> Basildon District Council Chelmsford City Council Epping Forest District Council Medway Council Southend-on-Sea Borough Thurrock Borough Council 	A	A <i>neighbouring</i> local authority (section 43(3)) that shares a boundary with a unitary council or lower-tier district council within whose area development is situated
<ul style="list-style-type: none"> Brentwood BC LB Havering 	B	A unitary council or a lower tier district council in which the development is situated – a <i>host</i> authority
<ul style="list-style-type: none"> Essex County Council 	C	An upper-tier county council in which the development is situated – a <i>host</i> authority
<ul style="list-style-type: none"> Cambridgeshire County Council London Borough of Enfield Hertfordshire County Council 	D	A unitary council or an upper tier county council which shares a boundary with a host ‘C’ authority – a <i>neighbouring</i> authority (section 43(3))

Name	A, B, C or D authority	Criteria for identification
<ul style="list-style-type: none"> London Borough of Barking and Dagenham London Borough of Bexley London Borough of Redbridge Suffolk Borough Council London Borough of Waltham Forest 		

5.6 Persons with Interest in Land (PiLs)

- 5.6.1 Consultation with PiLs is a requirement under section 42(1)(d) of the PA 2008, with the categorisation (i.e. Category 1, 2 or 3) of PiLs defined in section 44 of the PA 2008.
- 5.6.2 The identification of the potential PiLs was undertaken prior to the commencement of the consultation. This involved the purchase of Title Registers, desk research, site visits and consultation with the District Valuer to verify the Category 3 parties in order to identify those parties who may be eligible to make a claim under section 10 of the Compulsory Purchase Act 1965, Part 1 of the Land Compensation Act 1973 or section 152(3) of the PA 2008). The methodology for identifying land interests as defined in section 42(d) and section 44 of PA 2008 is described further in the Statement of reasons in section 4.6 (application document TR010029/APP/4.1).
- 5.6.3 Before the start of the consultation approximately 1,066 land interest questionnaires (LIQs) and an accompanying letter were sent to all parties identified as potentially falling in either Category 1, 2 or 3.
- 5.6.4 The LIQs included plans of the relevant land interest and red line boundary plan of the Scheme and sought confirmation that the details were correct and if not, asking for the addresses to supply the correct information. All parties were asked to return their completed LIQ within 15 days of receipt.
- 5.6.5 A copy of the LIQs and accompanying letter is provided at **Annex C3**.
- 5.6.6 A draft Book of reference was prepared for the statutory consultation and used to inform the section 44 consultee list that identified the relevant land interest by category. Accordingly, all PiLs were appropriately consulted.
- 5.6.7 Throughout the statutory consultation additional information was obtained from returned LIQs, including updated address details. Those identified early in the consultation process were sent letters, and those identified later were provided with an extension to the consultation deadline.

Figure 5.6.1: Geographical location of the local authority consultees with the Scheme



5.7 Consultation materials

5.7.1 The section 42 consultation was carried out in parallel with activities designed to meet the Applicant's 'Duty to consult local community' (section 47) and 'Duty to publicise' (section 48). The consultation materials were made available on the Scheme webpage www.highwaysengland.co.uk/m25j28 (please note this website domain no longer exists and has been replaced with www.highwaysengland.co.uk/m25j28 <https://highwaysengland.co.uk/projects/m25-junction-28-improvements/>) and at all public exhibitions (see **Chapter 6**) and in display locations (see **Paragraph 6.3.2**).

5.7.2 The full suite of consultation materials consisted of:

- Consultation brochure (including Scheme/route map showing the full extent of the Scheme on a red line boundary plan) (Annex C4)
- Consultation response form (Annex C5)
- Scheme/route map on a red line boundary (Figure 4.6.1)
- Scheme plan (Figure 4.6.2)
- PEIR and non-technical summary
- Section 47 notices (Annex C6)
- Section 48 notices (Annex C7)
- Public Consultation Report (summarising findings from previous consultation) (Annex B8)
- DCO leaflet (Annex C8)
- Scheme Assessment Report (SAR)⁸
- Technical Appraisal Report (TAR)⁹
- SoCC (please see Chapter 6 of this report)

5.8 Consultation channels

5.8.1 On 30 November 2018 letters were sent to all section 42 consultees to notify them of the statutory consultation.

5.8.2 Notification letters were sent in hard copy by post (first class) or as an electronic attachment by email, depending on the contact details in the Applicant's stakeholder database and the section 44 consultee list. **Table 5.8.1: Section 42 letters types and consultation materials issued below** outlines the materials accompanying each of the letters sent to section 42 consultees.

5.8.3 Consultees were advised in their letters that all of the consultation materials were available on the Scheme webpage www.highwaysengland.co.uk/m25j28 and at all public exhibitions (see **Chapter 7**) and in display locations (see **Table 7.3.2**).

5.8.4 An additional 11 section 42 letters were sent on 6 December 2018 due to updated information from recently returned LIQs. No extension date to the consultation was provided as consultation had only started at the beginning of that week and it was considered they had sufficient time to respond i.e. more

⁸ Available on Scheme webpage www.highwaysengland.co.uk under 'Consultation 2018-19'

⁹ Available on Scheme webpage www.highwaysengland.co.uk under 'Consultation 2018-19'

than the minimum of 28 days outlined in the DCLG guidance¹⁰ and section 45(2) of the PA 2008.

Table 5.8.1: Section 42 letters types and consultation materials issued

Letter type	Consultation materials included
Prescribed consultees	Letter (Annex C9), section 48 notice, consultation brochure and response form
Local authorities	Letter (Annex C9), section 48 notice, consultation brochure and response form
GLA	Letter (Annex C9), section 48 notice, consultation brochure and response form
PiLs (category 1 and 2)	Letter (Annex C9) consultation brochure and response form
PiLs (category 3)	Letter (Annex C9) consultation brochure and response form

5.8.5 Notification emails were sent to Epping Forest District Council and Hertfordshire County Council on 30 November 2018. Following those emails being sent the Applicant received an 'undeliverable' notification. Letters were then reissued by post as part of the extension to the consultation.

5.8.6 Two 'drop in sessions' for PiLs were arranged and details of these events were included in their notification letters. These were held on 10 December 2018 and 10 January 2019. The same letter also included an offer of a one-to-one sessions if the 'drop in sessions' were not convenient. This offer was made to ensure that PiLs could engage with the Project Team at a time to suit them if they wished to do so.

5.9 Extension to consultation

5.9.1 On 30 January 2019 the Scheme webpage was updated to say that there was an extension to the consultation, and responses could be received until 11.59pm on 28 February 2019.

5.9.2 In addition to the 11 PiLs identified in **Paragraph 5.8.4**, a further 84 newly identified PiLs from later returned LIQs (i.e. which were received a week after statutory consultation had started and from then onwards until the start of the extension to consultation) and two section 42(1)(b) consultees were all sent a covering letter by post on 30 January 2019. The letter outlined the consultation, along with a hard copy brochure and response form.

5.9.3 The Applicant also took the opportunity to include 30 additional national interest groups. All groups were emailed a copy of the covering letter on 31 January 2019 and a copy of the brochure and response form. The additional national interest groups form part of the Applicant's National Road Users Committee and

¹⁰ Paragraph 23, Planning Act 2008: Guidance on pre-application process, former Department for Communities and Local Government, updated March 2015

Vulnerable Road Users Committee and membership of these committees is outlined in Table 5.9.1.

5.9.4 Copies of these letters are located in **Annex C10**, which gave a revised deadline of 28 days until 28 February 2019.

5.9.5 On 28 February 2019 a post was also placed on the Applicant's Facebook page to provide a prompt that the consultation was about to close. See Figure 5.9.2.

Table 5.9.1: National interest group committee membership

National Road Users Committee	Vulnerable Road Users Committee
<ul style="list-style-type: none"> • Automobile Association (AA) • British Vehicle Rental Licensing Association • Camping & Caravanning Club • Confederation of Passenger Transport • Det Forenede Dampskibs-Selskab • Dynamic Parcel Distribution • Driver and Vehicle Standards Agency • Freight Transport Association • IAM Roadsmart - Institute of Advanced Motorists • John Lewis • Megabus • Muller • National Express • RAC • RAC Foundation • Road Haulage Association • Royal Mail • Transport Focus • UPS – United • Parcel Service • Waitrose • XPO Logistics 	<ul style="list-style-type: none"> • British Horse Society • Sustrans • Cycling UK • Living Streets • Ramblers UK • Natural England • Campaign for Better Transport • Transport Focus

Figure 5.9.1: Screenshot of Facebook post



- 5.9.6 The three main libraries (Romford Central, Brentwood and Chelmsford) continued to display the full suite of consultation materials (as listed in **Paragraph 5.7.2**) until 28 February 2019.
- 5.9.7 Although the extension to the consultation was aimed at specific identified consultees, to avoid confusion the Applicant has taken on board all comments received from consultees submitted to it up until 11.59pm on 28 February 2019.

5.10 Feedback mechanisms

- 5.10.1 Throughout the consultation period, feedback was invited through a range of channels:
- **Online:** completing and submitting the response form online at www.highways.gov.uk/m25j28.
 - Completing the response form and returning it to **FREEPOST M25 junction 28 improvement scheme**
 - **Emailing** a response to info@highwaysengland.co.uk.
 - Post: by writing to FREEPOST M25 junction 28 improvement scheme

5.11 Responses from section 42 consultees

- 5.11.1 The following section summarises the key issues raised by section 42 consultees in response to the statutory consultation.

5.11.2 In total, 20 responses were received from section 42 consultees, including:

- Thirteen from prescribed (section 42(1)(a)) consultees.
- Six from local authorities (section 42(1)(b) &(c)) consultees.
- One response from a PiL (section 42(1)(d)) consultees.

5.11.3 The matters raised in these responses can be categorised into the following topic headings:

- Scheme principles and operations
- Environmental impacts (water & drainage, biodiversity, cultural heritage, people & communities, geology & soils, materials & waste, air quality, noise and vibration and cumulative impacts)
- Green belt
- Construction impacts
- Non-motorised users

5.11.4 The multi-disciplinary project team considered each comment raised and whether changes were being requested and if so, whether they could, and should, be made to the Scheme. Where changes were proposed to the design, these were in some instances subject to further discussions with the relevant consultee as outlined in **Chapter 8** of this report. A supplementary consultation on the main proposed changes to the Scheme, following statutory consultation was undertaken in November to December 2019 which is reported in **Chapter 9** of this report.

5.12 Tabulated summary of responses from section 42 consultees

5.12.1 **Table 5.12.1** below summarises the consultee response, explains how the Applicant has had regard to the response received (as required by section 49 of the PA Act 2008) and identifies any actions arising to be taken forward. Where the consultation response was a statement for consideration by the Applicant, the table below explains the Applicant's consideration of that statement and records 'Not applicable' in the final column.

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
Scheme principles and operation			
Traffic implications	<p>LB Havering 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>LB Havering 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>WebTAG unit M2.2 para 4.4.4 states 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
Scheme principles and operation			
		<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
Scheme principles and operation			
		<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 Chapter 8 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>Brentwood BC 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
Scheme principles and operation			
	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.		
	Essex CC 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.'
	Essex CC 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.
	Essex CC 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
Scheme principles and operation			
	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).
	London Borough of Barking and Dagenham 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
	Chelmsford City Council expressed support for the Scheme and wishes to be involved in future consultations.	Noted	N/A
	Doddington Parish Council 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

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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	National Grid (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>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 Chapter 9 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>

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
		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.	
	Cadent Gas 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.	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 Chapter 8 of this report). The Scheme has been modified to accommodate the gas diversion, including the relocation of a drainage pond. A preferred option has been agreed based on environmental considerations, safety, constructability and impacts on landowners.	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).
	Health & Safety Executive 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,	The Applicant is proposing to divert Cadent Gas's main pipeline, and this proposal was included as part of the supplementary consultation (Chapter 9).The	The DCO application is seeking the relevant powers for diversion of the Cadent gas pipeline and protection of the BPA asset. Protective provisions are included in the draft DCO

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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)).
	British Pipeline Agency (BPA) Limited 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 Chapter 8 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.

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	Harlaxton Energy Networks Ltd and ESP Utilities Group Ltd both confirmed that they had no assets in the area.	Noted	N/A
	Peel Energy notification of a change of contact details.	Noted	N/A
Impact on Maylands Golf Club	Luddington Golf Limited (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.

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
		boundary which was subject to a targeted consultation with Luddington Golf Limited (see Chapter 10 for further details).	
Environment			
Water Environment	The EA 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).

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
		Planning Inspectorate's Advice Note Eighteen: The WFD.	
	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>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>

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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.	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. 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).	detailed in the WFD compliance assessment report (application document TR010029/APP/6.7).
	The EA 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. The application site is partially within Flood Zone 2 and 3 and the Scheme	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). The current design for the crossing over the Weald Brook and	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.

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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.	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>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>

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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.		
	Essex CC 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) ¹¹ . 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 EA 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.

¹¹ 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
Scheme principles and operation			
	pre-cast concrete and should be set back away from the riverbank.		
	The EA 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.	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	Natural England 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.	Areas of mitigation are proposed in the DCO application following discussions with Natural England (see Chapter 8 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).	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).
	LB Havering 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	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	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.

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	<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 Chapter 9 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>
	Essex CC highlighted that they considered there were opportunities to	Discussions about plans to enhance the site through	The Scheme incorporates an area for environmental mitigation. Full details are

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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.	creating/enhancing priority habitats and improving connectivity was undertaken and were included in the supplementary consultation (Chapter 9 in this report). The Scheme would not negatively affect a Priority habitat or species and therefore an IROPI justification is not required.	provided within the Landscape and Ecological Management Plan submitted in support of the ES (application document TR010029/APP/6.3).
	Essex CC considered that the project should aim for net gain biodiversity which would involve off-site compensation and monitoring.	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.	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).

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	Essex CC commented that the Outline CEMP and Outline LEMP must consider residual loss of habitat and compensation.	The Outline CEMP/REAC and Outline LEMP do refer to and consider residual loss of habitat and compensation.	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.
	Essex CC expressed the opinion that further bat surveys, particularly for Nathusius Pipistrelle and surveys of veteran trees should be undertaken.	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.	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).
	Essex CC commented that ecology and landscaping should be crossed referenced with the lighting strategy in the Ecological Management Plan.	Noted.	The Outline LEMP is also included in the ES (Appendix 7.16, application document TR010029) and REAC (application document TR010029/APP/7.3) also sets out all the mitigation measures proposed as part of the Scheme and references the lighting strategy during construction and operation.
	Essex CC suggested that the study area for SACs, SPAs, SSSIs and	The extent of the study area was considered and is determined by	The rational and extent of the study area is set out in Chapter 7 (Biodiversity) of

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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 FC 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	Historic England 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).

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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.	indicated that the Iron age-Romano British transition site is an early medieval site, and it is referred to as such.	
	LB Havering 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'.	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.	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.
	Essex CC requested that stakeholders are not consulted in isolation and commented that a study area of 500 metres is sufficient for non-designated	The assessment includes the impacts on the setting of heritage assets, including visual and auditory impacts in accordance	The study area was subsequently agreed with the relevant Historic Environment Officer at Essex CC – refer to Chapter 11 (cultural heritage) of the

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	Heritage Assets and Grade II listed buildings, but an additional 250 metres buffer zone is recommended for Grade I and II* listed heritage assets. They also stated that consideration should be given to the secondary impacts upon heritage assets, such as the potential requirement for secondary/double glazing.	with DMRB requirements. These are included in the Cultural Heritage chapter of the ES (application document TR010029/APP/6.1).	ES (application document TR010029/APP/6.1).
	Essex CC recommended more extensive trail trenching.	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	Details of the proposed programme of archaeological works is set out in the Outline CEMP (application document TR010029/APP/7.2).

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
		measures in respect of the construction works.	
People and communities	Essex CC 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>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>	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.
	Public Health England 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.	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 Chapter 8 of this report)	Plans of receptors was shared with the local authorities and an agreement was reached.
	Public Health England commented that Health Assessments should give equal merit to physical and mental health and the cumulative impact of the	The health impacts of the Scheme are included within the People and Communities chapter of the ES (application document TR010029/APP/6.1).	Details of the health impacts are outlined in Chapter 13 of the ES (application document TR010029/APP/6.1).

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	works alongside other major road schemes should be considered.		
Geology and soils	The EA 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)
	LB Havering 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	LB Havering 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).

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	The EA 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	LB Havering 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. ¹² 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	LB Havering 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

¹² 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
Scheme principles and operation			
Cumulative impacts	LB Havering 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.	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.	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.
	Essex CC 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.	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.	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.
Green Belt			
Impact on character and openness	LB Havering stated that the Scheme would adversely impact on the borough's Green Belt and requested that further information is provided on	The Applicant has considered the impact of the Scheme on green belt and openness and where possible, minimised its impact.	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

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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.	This includes keeping the proposed loop road as low as possible and proposing screen planting around its perimeter to lessen visual impacts.	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.
	Brentwood BC 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.	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.	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.
	Essex CC 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,	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	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.

Topic	Summary of consultee response	How the Applicant has had regard to responses received (section 49)	The outcome
Scheme principles and operation			
	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.	
Construction Impacts			
Construction Management Plan	<p>LB Havering 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>Essex CC 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.
	Royal Mail 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
Scheme principles and operation			
	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).
	LB Bexley 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
Non-motorised users			
Health impacts	Public Health England 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	LB Havering 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
Scheme principles and operation			
	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.	
	Brentwood BC 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
	Essex CC 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

6 Statement of Community Consultation (SoCC)

6.1 Introduction

- 6.1.1 In accordance with section 47(1) of the PA 2008, before commencing statutory community consultation, the Applicant prepared a draft SoCC setting out how it intended to consult with people living in the vicinity of the Scheme.
- 6.1.2 In accordance with section 47(2) the Applicant consulted each local authority that fell within section 43(1) of the PA 2008 on the development of the SoCC. The following local authorities were consulted; LB Havering, Brentwood BC, Essex CC and the GLA.

6.2 Development of SoCC

- 6.2.1 The four local authorities were contacted in August 2017 and offered meetings to discuss what was to be included within the SoCC. Meetings were held with the following three local authorities between August and September 2017; LB Havering, Brentwood BC and Essex CC. From these discussions a draft SoCC was prepared.
- 6.2.2 A draft SoCC was initially issued to the four local authorities on 12 October 2017 (**Annex D1**) and they were given a period of 28 days to provide comments in line with section 47(3) of the PA 2008. However, in December 2017 the Applicant decided to postpone the statutory consultation due to changes to the Scheme's programme, to enable coordination and alignment with another adjacent Highways England scheme. As a result, all local authorities were written to and informed of the postponement, and no comments were received.
- 6.2.3 The Scheme was remobilised in July 2018 and the draft SoCC (from October 2017) was used as a basis for early informal discussions with the local authorities.
- 6.2.4 LB Havering, Brentwood BC and Essex CC all took part in informal discussions from August to September 2018 to review and progress the draft SoCC (from October 2017). The Applicant received no response from GLA.
- 6.2.5 From the informal discussions with Essex CC it was suggested that two additional postcode areas (CM4 and CM5) were added to the consultation target area. However, the consultation target area was originally drawn to include those living and working within an approximate one-mile radius around the Scheme (see **Paragraph 6.3**). By adding just these two postcodes the mail out would have increased by approximately 9,800 more letters which was considered disproportionate. It was agreed with Essex CC, that instead of increasing the mail out, extra advertising for the consultation in local newspapers would be carried out in addition to the section 47 and section 48 notices (see **Paragraph 6.3.1** for full details of the advertising).
- 6.2.6 During these informal discussions, the Applicant informed the local authorities that a mobile consultation vehicle would also be available, and they could make suggestions of locations within their area, where this could be visited.
- 6.2.7 It was agreed that when the SoCC was formally issued the following wording would be included "There will also be some mobile consultation exhibitions in our

consultation vehicle. These will be promoted locally, and details will be available on our website www.highwaysengland.co.uk/m25j28.

- 6.2.8 The original draft SoCC (from October 2017) was updated in autumn 2018, a copy of this updated draft SoCC (**Annex D2**) was then formally issued to the four local authorities by email, with a covering letter on 5 October 2018 in accordance with section 47 of the PA 2008. Local authorities were given 28 days in accordance with section 47(3) to provide comments (by 4 November 2018). Copies of the covering letters are provided in **Annex D3**.
- 6.2.9 Responses from the following local authorities were received (see **Annex D4**):
- Essex CC on 2 November 2018.
 - LB Havering on 5 November 2018.
- 6.2.10 Brentwood BC and the GLA did not provide a response. Reminders asking for feedback and reiterating the closing date for comments were sent on 30 October 2018, and again on 2 November 2018. Copies of reminders to these two local authorities are provided within **Annex D5**.
- 6.2.11 Only one comment was received. One minor amendment to the SoCC was requested by LB Havering following the 28 day period for comments. This is listed in **Table 6.2.1**.

Table 6.2.1: SoCC consultation with local authorities

Section of SoCC	Suggestion/comment made by local authority	Regard had to the suggestion	Amendment to SoCC (if applicable)
LB Havering			
Consultation target area	To provide a better-quality map, as the postcodes highlighted in this could not be read easily.	Agreed	SoCC was amended

- 6.2.12 In accordance with Regulation 12 of the EIA Regulations, the SoCC included a statement confirming that the Scheme is an EIA Development and that a PEIR would form part of the consultation materials.
- 6.2.13 The SoCC was updated to reflect the feedback received from the local authorities and finalised in November 2018. A copy of the published SoCC is provided in **Annex D6**.

6.3 Publication of the SoCC

- 6.3.1 The PA 2008 sets out the requirements for the publication of the SoCC and in accordance with section 47(6) the Applicant published in a newspaper circulating in the vicinity of the Scheme, a notice stating where and when the SoCC could be viewed. A section 47 notice was placed in the following newspapers (copies in **Annex C6**):
- Brentwood Gazette on 5 December 2018
 - Romford Recorder on 7 December 2018

6.3.2 DCLG guidance¹³ sets that the SoCC should:

- 'act as a framework for the community consultation generally, for example, setting out where details and dates of events will be published' – The SoCC set out the locations and timing of the events (see SoCC in **Annex D6** and **Table 6.7.1**).
- 'be made available online, at any exhibitions or other events held by applicants' – The SoCC was uploaded to the Applicant's webpage on 3 December 2018 and made available at the 12 consultation events (see SoCC in Annex D6 and Chapter 6.5)
- 'be placed at appropriate local deposit points (e.g. libraries, council offices) and sent to local community groups as appropriate' – The SoCC was made available at 14 local deposit points and contained their addresses and opening times (see SoCC in **Annex D6** and **Table 6.3.2**).

6.3.3 The consultation was undertaken in accordance with the PA 2008 and associated guidance and in line with the SoCC as outlined in **Table 6.3.1**.

Table 6.3.1: SoCC compliance

SoCC statement	Detail
We've consulted on this document with the LB Havering, Brentwood BC, Essex CC and the GLA which are the local authorities in the area in which the Scheme is proposed to be built.	The Applicant consulted on a draft SoCC from 4 October 2018 to 4 November 2018. See Section 6.2 – development of SoCC for full details.
We are publishing a PEIR as part of the consultation material. The report will be available on the Scheme webpage and hard copies will be available to view at the consultation exhibitions and the display locations listed in the SoCC.	The PEIR and non-technical summary of the report were published and made available on the Scheme webpage, at the consultation exhibitions and three display locations. Copies of the report were also available on request from the Applicant. Copies of the full PEIR and PEIR non-technical summary are available on www.highwaysengland.co.uk/m25j28 .
Hold a consultation from 3 December 2018 to 28 January 2019.	The Applicant confirms the consultation was carried out between 3 December 2018 and 28 January 2019. An extension to this consultation was made to the 28 February 2019 for two specific groups of consultees (see Paragraph 5.9.2 and 5.9.3).

¹³ Paragraph 57, Planning Act 2008: Guidance on the pre-application process, former Department for Communities and Local Government, updated March 2015

SoCC statement	Detail
<p>During this consultation period, we will be consulting on the following particular elements of the Scheme:</p> <ul style="list-style-type: none"> • Respondents current travel habits around the junction • The need for improvement • Suitability of Option 5F with regard to congestion, safety and the environment • Environmental assessments and potential environmental impacts • Environmental mitigation measures 	<p>A response form for the consultation was published and details of this are outlined in Paragraph 7.3.9, with a full copy in Annex C5.</p>
<p>We'll let people living or working in the consultation target area know about the consultation by posting information to them in advance.</p>	<p>A letter was sent to people living or working in the consultation target area. See Annex E4</p>
<p>Eight consultation exhibition events will be held as described in the SoCC.</p>	<p>Eight consultation exhibitions events were held. See Table 7.5.1 public exhibitions.</p>
<p>Some mobile consultation exhibitions will be held in the consultation vehicle and these will be promoted locally with details will be available on our website.</p>	<p>The mobile consultation vehicle visited the following three locations:</p> <ul style="list-style-type: none"> • Thursday 13 December, 9am to 1pm at Thurrock Services RM16 3BG • Friday 14 December, 8.30am to 4pm at Romford Market RM1 3ER • Saturday 15 December, 9am to 1pm at Ingatstone and Fryerning Community Hall CM4 9ED <p>Details of the above were included in the consultation brochure and on the Scheme webpage for the duration of the consultation.</p> <p>During the consultation period we added one more location for the mobile consultation vehicle at Bluewater Shopping Centre, this was not included in the consultation brochure but was added to the Scheme webpage.</p>

SoCC statement	Detail
	Essex CC, LB Havering and Brentwood BC were all provided details to promote information locally via their own communication channels.
Our Scheme webpage will include; a summary of the Scheme, SoCC, consultation brochure and response form, PEIR and non-technical summary, plan showing the extent of the Scheme (red line boundary).	Scheme webpage included this information. See Paragraph 7.6.1 website
The consultation brochure will contain details of the Scheme and consultation exhibition events.	Consultation brochure contained this information. See Paragraph 7.3.7 for an outline of the brochure and a full copy in Annex C4 .
The consultation brochure and response form will be delivered to those living within the red line boundary.	These were both delivered. See Section 5.6 PiLs for full details.
Flyers or letters will be sent to people not directly affected by the Scheme (but within the statutory consultation target area).	A letter was sent to people living/working in the statutory consultation target area. (Annex E4) See Figure 7.2.1 , for full details.
The consultation brochure and response form will be available at display and deposit locations listed in the SoCC.	These were available, see Table 7.3.2
The suite of documents will include a PEIR and non-technical summary, which will set out environmental impacts and possible mitigation measures.	The PEIR and non-technical summary of the report were published and made available on the Scheme webpage, at the consultation exhibitions and three display locations. Copies of the report were also available on request from the Applicant. Copies of the full PEIR and PEIR non-technical summary are available at www.highwaysengland.co.uk/m25j28 . A full list of the consultation materials is listed in Paragraph 7.3.1 .

SoCC statement	Detail
Where possible we'll speak when invited to local council forums and community/area forums affected or in the vicinity of the Scheme.	The Applicant delivered a presentation to the Brentwood Business Partnership on 9 January 2019. No other requests were made.
Where possible we'll attend when invited, meetings of local community affected by the Scheme.	The Applicant arranged and facilitated a meeting to discuss potential access issues to and from Woodstock Avenue on 20 March 2019. This meeting included representatives from: <ul style="list-style-type: none"> • TfL • LB Havering • Woodstock Avenue residents No other requests were made.
Statutory notices to publicise the proposed DCO application and the SoCC will be issued.	Section 47 (Annex C6) and section 48 (Annex C7) notices were published. See Section 6.7 .
Adverts will be placed in locally circulating newspapers to promote the launch of the consultation and include details of consultation exhibition events.	Adverts were placed in local circulating newspapers; details are outlined in Section 7.7 publicising the consultation.
A press release detailing the consultation period and how the community and road users can get involved will be issued.	A press release was issued on 4 December 2019 to three publications see Table 7.7.6
The consultation will be publicised on Twitter and Facebook.	The consultation was publicised on the Applicant's Twitter and Facebook feeds, as well as being provided to the three local authorities. See Section 7.8 Social media.
A consultation response form will be produced to provide comments on the Scheme.	A response form for the consultation was published and details of this are outlined in Paragraph 7.3.9 , with a full copy in Annex C5 .
The suite of consultation materials will be available to view, free of charge, at the three display locations listed in the SoCC throughout the consultation period.	These were available at Romford Central Library, Brentwood Library and Chelmsford Library throughout the consultation period. For full details see Table 7.3.2 .

SoCC statement	Detail
The consultation brochures and response forms will be available to collect and takeaway at 11 deposit points, as listed in the SoCC, throughout the consultation.	Consultation brochures and response forms were available, and a full list of the deposit points can be viewed in Table 7.3.2 .
We will record and carefully consider all responses received during the consultation, and these will be considered in finalising the application before we submit it to the Planning Inspectorate.	These are outlined in Chapters 5, 7 and 9 : <ul style="list-style-type: none"> • 20 responses from section 42 consultees • 261 responses from section 47 consultees • 30 responses from section 47 consultees (supplementary consultation)
We'll summarise the findings in a Consultation Report which will include a description of how the application was informed by the responses received, and outline any changes made as a result of consultation.	This report – specifically: Chapters 5 and 7 (statutory consultation) Chapter 8 (engagement and changes) Chapter 9 (supplementary consultation)

6.4 Exceptions to the SoCC

- 6.4.1 The SoCC stated that ‘we will advertise the statutory consultation by placing media adverts in locally circulating newspapers. The adverts will promote the launch of the consultation period and include details of the consultation events.’
- 6.4.2 Including full details of all the consultation exhibition events on the advert meant it became too wordy and difficult to read. To address this, the Applicant added the webpage address and contact details for more information. A copy of the advert is provided in **Annex D7**.
- 6.4.3 The adverts were all run twice, once at the start of the consultation and again after the Christmas break. See **Section 7.7** for full details of the adverts.
- 6.4.4 In addition, the full details of all consultation exhibitions events were included in the letters that were sent out to those people living and working in the consultation target area.

7 Consultation with local communities (section 47)

7.1.1 The Applicant undertook a statutory consultation with local communities in accordance with the SoCC (see **Paragraphs 6.3.3 to 6.3.7 and Table 6.3.1**) for an eight week period between 3 December 2018 and 28 January 2019 (56 days).

7.2 Who was consulted

7.2.1 The community was defined as those living or working within a one-mile radius of the Scheme location, as this would reflect those most likely to be affected by the Scheme. Some small extensions to ensure villages and distinct groups of houses were included as a whole, rather than the consultation target area running through the middle of a community. **Figure 7.2.1** shows the physical extent of the consultation target area for the consultation, as discussed and agreed with the local authorities as part of the SoCC.

7.2.2 The Applicant also included the following additional stakeholders:

- Local MPs
- Local elected ward councillors at Essex CC, LB Havering, and Brentwood BC
- Local and national interest groups
- Local community and business groups
- Respondents from the options consultation

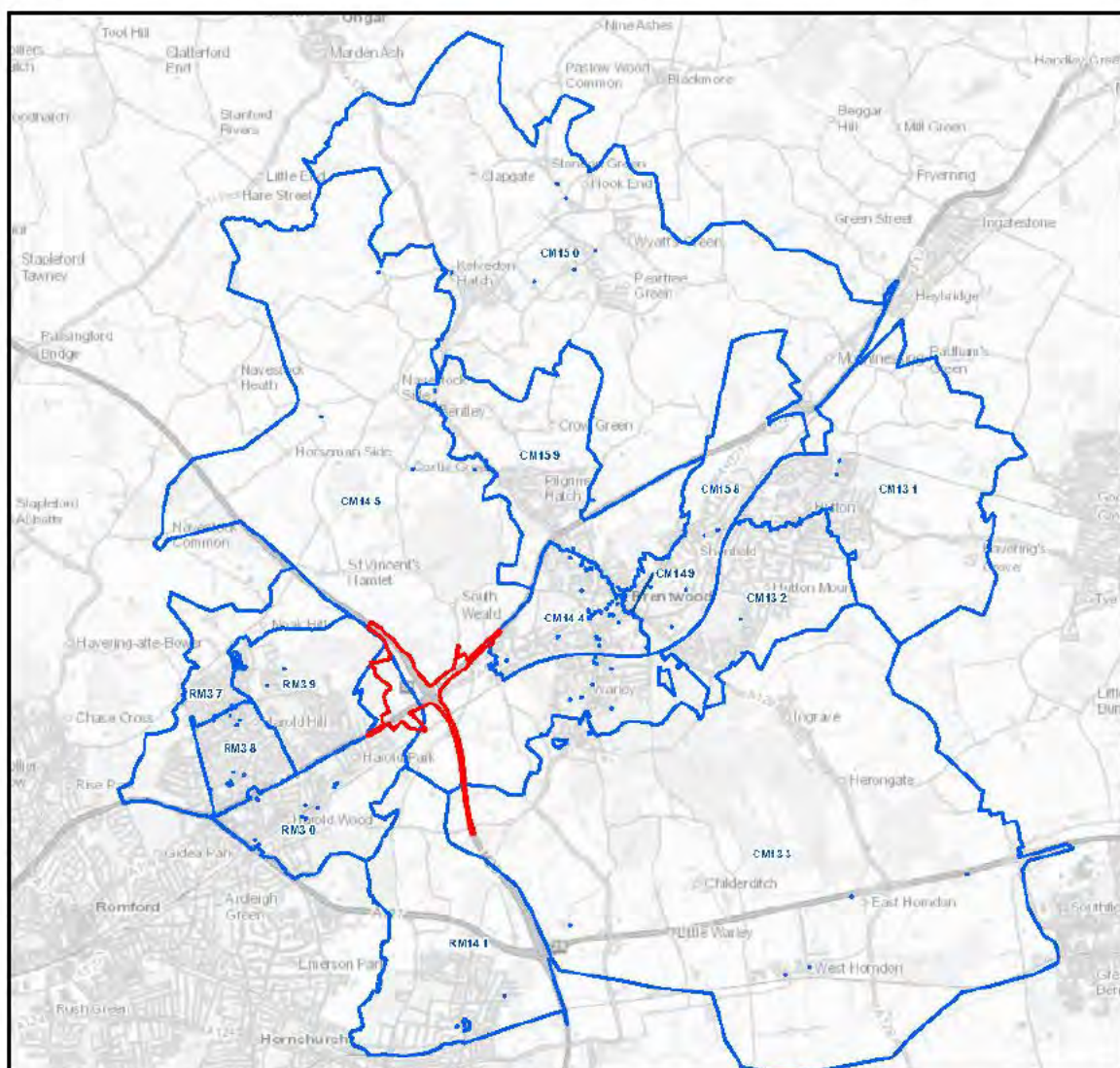
7.2.3 A full list of stakeholders is included in **Annex E1, C2**.

7.3 Consultation materials

7.3.1 The Applicant prepared the following materials:

- Consultation brochure
- Consultation response form
- Scheme/route map showing the full extent of the red line boundary area
- PEIR and non-technical summary
- Statutory notices in local and national press (section 47 and section 48)
- Public Consultation Report summarising the findings from the previous consultation
- DCO leaflet, explaining the planning process in more detail
- TAR – this summarises the technical aspects of the existing highway problem and identifies options to address these. The TAR confirms options considered for further development and consultation as reported in the SAR
- SAR – this brings together all the assessments to identify preferred option
- SoCC
- 3D visualisation of the Scheme
- Roller banners to display key summary information (extracted from the consultation brochure). A copy of these are available in Annex E2

- Figure 7.3.1: Physical extent of the statutory consultation target area**



A range of these consultation materials were made available at various locations throughout the consultation period, as set out in the SoCC and at <https://highwaysengland.citizenspace.com/he/m25-junction-28-statutory-consultation/>. All the consultation materials were available at the three main libraries (Romford Central Library, Brentwood Library and Chelmsford Library – one in each of the host authorities).

Table 7.3.1: Availability of the consultation materials

Dates available (including opening hours)	Location	Consultation materials available
3 December 2018 to 28 January 2019 Monday – 10am to 8pm Tuesday – 9am to 5pm Wednesday – 9am to 5pm Thursday – 10am to 8pm Friday – 9am to 5pm Saturday – 10am to 4pm Sunday – Closed	Romford Central Library St Edwards Way, Romford, RM1 3AR	<ul style="list-style-type: none"> • Consultation brochures and response forms • Scheme/route map • PEIR and non-technical summary • Statutory notices • Public Consultation Report • DCO leaflet • SAR and TAR • SoCC
3 December 2018 to 28 January 2019 Monday – 9am to 6pm Tuesday – 9am to 6pm Wednesday – 9am to 1pm Thursday – 9am to 6pm Friday – 9am to 6pm Saturday – 9am to 5pm Sunday – Closed	Brentwood Library New Road, Brentwood, CM14 4BP	<ul style="list-style-type: none"> • Consultation brochures and response forms • Scheme/route map • PEIR and non-technical summary • Statutory notices • Public Consultation Report • DCO leaflet • SAR and TAR • SoCC
3 December 2018 to 28 January 2019 Monday – 9am to 6.30pm Tuesday – 9am to 6.30pm Wednesday – 9am to 6.30pm Thursday – 9am to 6.30pm Friday – 9am to 6.30pm Saturday – 9am to 5.30pm Sunday – 1pm to 4pm	Chelmsford Library County Hall, Market Road, Chelmsford, CM1 1QH	<ul style="list-style-type: none"> • Consultation brochures and response forms • Scheme/route map • PEIR and non-technical summary • Statutory notices • Public Consultation Report • DCO leaflet • SAR and TAR • SoCC

Dates available (including opening hours)	Location	Consultation materials available
3 December 2018 to 28 January 2019 Monday – 8.45am to 4.45pm Tuesday – 8.45am to 4.45pm Wednesday – 8.45am to 4.45pm Thursday – 8.45am to 4.45pm Friday – 8.45am to 4.45pm Saturday – Closed Sunday - Closed	Chelmsford City Council Civic Centre, Duke Street, Chelmsford, CM1 1JE	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC
3 December 2018 to 28 January 2019 Monday – 8am to 4pm Tuesday – 8am to 4pm Wednesday – 8am to 4pm Thursday – 8am to 4pm Friday – 8am to 4pm Saturday – Closed Sunday - Closed	Havering Town Hall Main Road, Romford RM1 3BD	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC
3 December 2018 to 28 January 2019 Monday – 6am to 10.30pm Tuesday – 6am to 10.30pm Wednesday – 6am to 10.30pm Thursday – 6am to 10.30pm Friday – 6am to 10.30pm Saturday – 8am to 9.30pm Sunday – 8am to 9.30pm	Central Park Leisure Centre Gooshays Drive, Harold Hill, Romford, RM3 9LB	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC
3 December 2018 to 28 January 2019 Monday – 10am to 8pm Tuesday – 9am to 5pm Wednesday – 9am to 5pm	Upminster Library 26 Corbets Tey Road, Upminster, RM14 2BB	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC

Dates available (including opening hours)	Location	Consultation materials available
Thursday – 10am to 8pm Friday – 9am to 5pm Saturday – 10am to 8pm Sunday - Closed		
3 December 2018 to 28 January 2019 Monday – 10am to 4pm Tuesday – Closed Wednesday – 12am to 6pm Thursday – Closed Friday – 10am to 4pm Saturday – 10am to 4pm Sunday - Closed	Old Harlow Library 30 High Street, Old Harlow, CM17 0DW	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC
3 December 2018 to 28 January 2019 Monday – 9.15am to 1.15pm Tuesday – 2pm to 5pm Wednesday – 9.15am to 1.15pm Thursday – 10am to 7pm Friday – 9.15am to 1.15pm Saturday – 9am to 1pm Sunday - Closed	North Weald Library 138 High Road, North Weald, Epping, CM16 6BZ	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC
3 December 2018 to 28 January 2019 Monday – 9am to 5.30pm Tuesday – 9am to 5.30pm Wednesday – Closed Thursday – 9am to 5.30pm Friday – Closed Saturday – 9am to 5.30pm Sunday - Closed	Epping Library St Johns Road, Epping, CM16 5DN	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC
3 December 2018 to 28 January 2019 Monday – 10am to 8pm	Harold Hill Library 19A Farnham Road, Harold Hill,	<ul style="list-style-type: none"> • Consultation brochures and response forms

Dates available (including opening hours)	Location	Consultation materials available
Tuesday – 9am to 5pm Wednesday – 9am to 5pm Thursday – 10am to 8pm Friday – 9am to 5pm Saturday – 10am to 4pm Sunday - Closed	Romford, RM3 8ED	<ul style="list-style-type: none"> • SoCC
3 December 2018 to 28 January 2019 Monday – Closed Tuesday – Closed Wednesday – 10am to 4pm Thursday – 1pm to 8pm Friday – 10am to 4pm Saturday – 10am to 4pm Sunday - Closed	Gidea Park Library Balgores Lane, Gidea Park, RM2 6BS	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC
3 December 2018 to 28 January 2019 Monday – 9am to 5.30pm Tuesday – 9am to 5.30pm Wednesday – 9am to 5.30pm Thursday – Closed Friday – 9am to 5.30pm Saturday – 9am to 5pm Sunday - Closed	Shenfield Library Hutton Road, Shenfield, Brentwood, CM15 8NJ	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC
3 December 2018 to 28 January 2019 Monday – 1pm to 10pm Tuesday – 1pm to 10pm Wednesday – 1pm to 10pm Thursday – 1pm to 10pm Friday – 1pm to 10pm Saturday – 10am to 3pm Sunday - Closed	Hornchurch Library 44 North Street, Hornchurch, RM11 1TB	<ul style="list-style-type: none"> • Consultation brochures and response forms • SoCC

7.3.3 The 3D visualisation of the Scheme was available on the Scheme webpage and at all the consultation exhibition events.

- 7.3.4 The roller banners and visualisation of traffic conditions were only available at the consultation exhibition events.
- 7.3.5 The photographic image of the current layout of the junction 28, was used on Twitter and provided to local authority communication teams for their own communication channels.
- 7.3.6 During the consultation period, Brentwood, Shenfield and Romford libraries requested additional brochures and response forms, as they had run out. Restocks were provided.
- 7.3.7 The brochure included the following information:
- Consultation dates
 - That the Scheme is an NSIP under the PA 2008
 - A PEIR has been prepared
 - How to respond to the consultation
 - Description of the consultation material available to view, and where and how
 - Consultation exhibitions event dates (open to the public)
 - Why the Scheme is needed
 - Scheme objectives
 - Copy of the context plan and Scheme plan (on a red line boundary)
 - Outline of proposed Scheme
 - Benefits and effects of proposed Scheme
 - Next steps (after the consultation)
 - Contact details
- 7.3.8 The consultation response form had a total of 17 questions, including a mix of structured questions and open-ended questions, with free flow text boxes. This provided respondents with the opportunity to expand on their answers if they wanted to and provide information about something the Applicant had not specifically asked.
- 7.3.9 The response form was divided into the following seven sections:
- **Personal information** – name, address, contact information and name of organisation (if applicable) was requested. This information was obtained to provide a demographic understanding of the respondents that had been reached, as well as specific contact information for future use.
 - **Section A** – was designed to find out about respondents' current travel conditions and contained mainly structured questions, with one open ended question to allow them to include any information that was not specifically requested. Respondents were asked structured questions about what routes they used through the junction, times they usually travelled, how they travelled through, what they used the junction for, their current travel conditions, and how close they lived and worked (if applicable) to the Scheme. Respondents could give multiple answers to each question.
 - **Section B** – included specific questions about the Scheme to gain an understanding of whether respondents were in agreement/support of it. There were three structured questions that asked respondents specifically:

- Do you think there is a need to improve M25 junction 28?
 - Does our Scheme address the current travel conditions (identified in section A)? Respondents could tick multiple answers to this question and rate them from 'Very well' to 'Not applicable'
 - What are your views about the proposed improvements? Respondents were provided with a multiple option they could tick and rate them from 'Negative view' to 'Positive view'.
 - A free flow text box was provided at the end of each of these three questions.
 - **Section C** – respondents were provided with a list of 11 potential environmental impacts and were asked if they agreed with the proposed approach to the way the Applicant was addressing them, as set out in the PEIR and non-technical summary (page numbers were provided for specific information in both documents to assist respondents with their answers). For each item in the list respondents were asked to tick a 'Yes' or 'No' box, as well as being provided with a free-flow text box for each item.
 - **Section D** – contained two questions with 'Yes' and 'No' tick boxes so respondents could tell the Applicant if there was anything else they wanted it to consider around either construction, and if the Scheme needed to be modified or changed. For each of these two questions a free flow text box was provided.
 - **Section E** – was included to evaluate the consultation material provided and the consultation exhibitions events held, to help the Applicant understand and shape future consultation work. There were four questions, including:
 - A list of materials where respondents could tick multiple responses on what they had used during the consultation.
 - A 'Yes' and 'No' box to establish if they found these materials useful, as well as a free flow text box.
 - A 'Yes' and 'No' box to understand if they attended a consultation exhibition event.
 - A checklist where respondents could tick multiple responses on how they found out about the consultation.
 - **Section F** – was an optional section included to find out more about the demographics on respondents. This included two structured questions about respondents age and whether they consider themselves as a person with a disability.
- 7.3.10 The response form also included a FREEPOST address, so that respondents did not need to purchase a stamp to return it.
- 7.3.11 An online version of the consultation response form was made available via the Scheme webpage (see **Section 6.6** for more details). The online response form was only available while the consultation was live; this was to avoid confusion among potential respondents about whether their comments would be considered if submitted after the consultation period.

7.4 Consultation channels

- 7.4.1 A range of consultation channels were used throughout the consultation period including the use of letters, website, social media, public consultation exhibitions and display locations, local advertising and a press release.
- 7.4.2 Letters were sent to all residential and commercial addresses in the consultation target area, as illustrated in **Figure 7.2.1**. The total number of letters sent out was 56,921.
- 7.4.3 As the mailout was so large, an external mailing house was used to; purchase the address points, print the letters, prepare and manage the mail delivery (which was by second class post). This was to ensure the mailout could be completed within the set timescales needed. Due to the volume, the letters were dispatched over two days; Tuesday 27 November and Wednesday 28 November 2018.
- 7.4.4 A copy of this letter can be found in **Annex E4**. The distribution of letters by postcode is identified in **Table 7.4.1**.

Table 7.4.1: Distribution of residential and commercial addresses in the consultation target area

Postcode	Residential	Commercial
RM3 0	5230	229
RM3 7	4499	32
RM3 8	4788	202
RM3 9	4578	49
RM14 1	4756	95
CM13	10903	452
CM14	10058	658
CM15	9999	393
Total	54811	2110

7.5 Consultation exhibition events

- 7.5.1 12 consultation exhibitions events were undertaken in the local community. A variety of different days and times were offered to provide as many stakeholders as possible the opportunity to attend at a convenient time for them.
- 7.5.2 The Scheme project team, including representatives from the different technical disciplines, were available at the events to discuss specific queries or concerns that arose throughout the consultation exhibitions.
- 7.5.3 The details of the 12 exhibition events are shown in **Table 7.5.1**. Eight of these were held at local community centres/conference centres/town halls, and a

further four in a mobile consultation vehicle (**Figure 7.5.1**) that visited specific locations.

Table 7.5.1: Consultation exhibitions undertaken in the local community

Type of event	Date	Location
Consultation exhibition event	Wednesday 5 December 2018 1pm to 9pm	Holiday Inn Brentwood CM14 5NF
Consultation exhibition event	Thursday 6 December 2018 9am to 8pm	Holiday Inn Brentwood CM14 5NF
Consultation exhibition event	Tuesday 11 December 2018 9am to 9pm	CEME Conference Centre Marsh Way Rainham Havering RM13 8EU
Mobile consultation vehicle	Thursday 13 December 2018 9am to 1pm	Thurrock Services Arterial Road West Thurrock Grays RM16 3BG
Mobile consultation vehicle	Friday 14 December 2018 8.30am to 4pm	Romford Market 98 Market Place Romford RM1 3ER
Mobile consultation vehicle	Saturday 15 December 2018 9am to 1pm	Ingatestone and Fryerning Community Hall 7 High Street Ingatestone CM4 9ED
Consultation exhibition event	Monday 17 December 2018 1pm to 9pm	My Place 343 Dagnam Park Drive Romford RM3 9EN
Consultation exhibition event	Tuesday 8 January 2019 9am to 9pm	YMCA 29 Rush Green Road Romford RM7 0PH

Type of event	Date	Location
Mobile consultation vehicle	Friday 11 January 2019 10am to 3pm	Bluewater Shopping Centre - Dartford Greenhithe DA9 9ST
Consultation exhibition event	Saturday 12 January 2019 1.30pm to 7pm	South Weald Parish Hall 85 London Road Brentwood CM14 4NP
Consultation exhibition event	Thursday 17 January 2019 10.30am to 9pm	Havering Town Hall Romford RM1 3BD
Consultation exhibition event	Friday 18 January 2019 9am to 8pm	Havering Town Hall Romford RM1 3BD

Figure 7.5.1: Image of consultation vehicle at Romford Market



- 7.5.4 Consultation materials (as detailed in **Paragraph 7.3.1**) were available to view at all consultation exhibitions events. For the mobile consultation vehicle events, the roller banners and visualisation of traffic conditions were not available due to space capacity.
- 7.5.5 Members of the public who attended any of the 12 exhibitions were asked if they would like to provide their name and email address/postal address to receive

further updates about the Scheme in the future, of which 400 attendees signed up.

7.6 Website

- 7.6.1 Details of the Scheme and the statutory consultation were uploaded to the Applicant's webpage at www.highwaysengland.co.uk/m25j28.
- 7.6.2 Information available on line, to view, included; a Scheme overview, the need for improvement and the aims of the Scheme, timetable of public exhibitions and mobile exhibitions the public could attend, details of collection points where brochures and response forms could be collected, display locations where consultation materials could be viewed, and the 3D visualisation of the Scheme.
- 7.6.3 Additionally, the PEIR and non-technical summary, statutory notices, Public Consultation Report (findings from the previous consultation), DCO leaflet, SAR, TAR and the SoCC were also made available to view and download.

7.7 Publicising the consultation (section 48)

- 7.7.1 A notice advertising the Applicant's intention to apply for a DCO in respect of the Scheme was published in accordance with section 48 of the PA 2008 and Regulation 4 of the APFP Regulations. The newspapers they were published in and publication dates are provided in **Table 7.7.1**.

Table 7.7.1: Section 48 notice publication details

Newspaper	Date of publication
The Guardian	3 December 2018
The London Gazette	3 December 2018
Romford Recorder	7 December 2018 and 14 December 2018
Brentwood Gazette	5 December 2018 and 12 December 2018

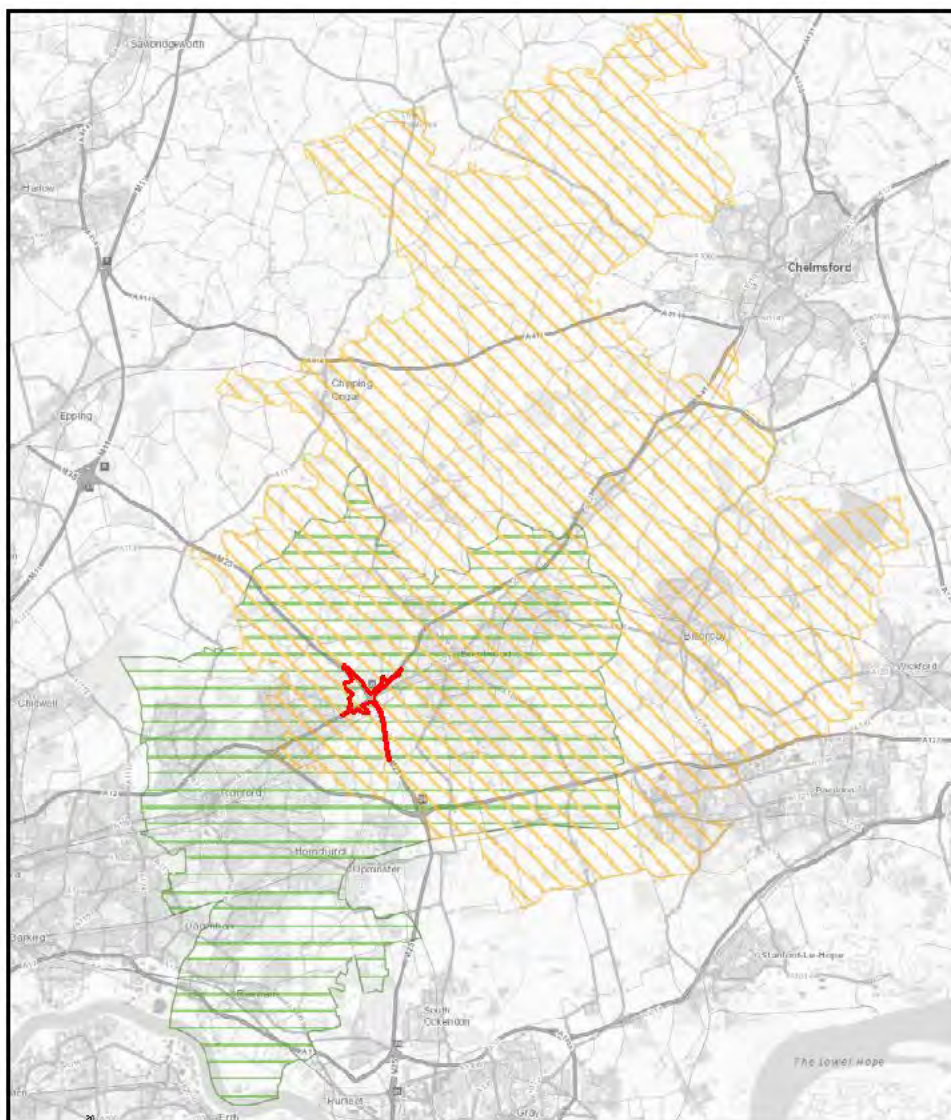
- 7.7.2 The section 48 notice included a statement confirming that the Scheme is an EIA Development and that the PEIR would form part of the consultation material. In accordance with Regulation 13 of the EIA Regulations, a copy of the section 48 notice was sent to all the consultation bodies and any additional bodies that the Planning Inspectorate advised the Applicant of under Regulation 10 of the EIA Regulations.
- 7.7.3 The section 48 notice contained all of the information required under Regulation 4(3) of the APFP Regulations and included:
- The name and address of the Applicant
 - A statement that the Applicant intends to make an application for a DCO to the SoS
 - A statement that the Scheme is an EIA development
 - A summary of the main proposals, route location and proposed development

- A statement that the consultation materials (documents, plans etc.) were available to view free of charge at the stated locations and times. Paper copies of the consultation brochure, feedback form, section 48 notice and SoCC would be available free of charge. For paper copies of any other materials a reasonable charge will be made to cover printing, postage and VAT up to a maximum of £200
- The dates and duration that the materials were available for inspection (including opening hours and a note that stated 'the above locations may be closed on bank holidays')
- Confirmation that all responses would need to be received by 11.59pm on 28 January 2019
- Details of how to respond to the publicity.

7.7.4 Copies of the section 48 newspaper notices can be found in **Annex C7**.

7.7.5 **Figure 7.7.15** shows the approximate circulation extent of the Romford Recorder and Brentwood Gazette against the vicinity of the Scheme.

Figure 7.7.5: Circulation of the Romford Recorder and Brentwood Gazette against the Scheme



7.7.6 In addition to the statutory notices, quarter page adverts were also placed in the local newspapers to publicise the consultation. These were made in addition to the statutory notices and included the following information:

- Scheme name
- Consultation dates
- Webpage address
- Email address

Table 7.7.2: Additional newspaper advertising

Newspaper	Date of publication
Brentwood Gazette	05 December 2018 and 02 January 2019
The Romford Recorder	07 December 2018 and 03 January 2019
Essex Chronicle	06 December 2018 and 03 January 2019

7.7.7 A copy of the advert can be found in **Annex D7**.

7.7.8 A press release (**Annex E5**) was issued on 4 December 2019 to promote the consultation. Along with this, all local media were invited to a specific media event hosted on Wednesday 5 December 2018 from 11am to 12 noon at the Holiday Inn, Brentwood CM14 5NF.

7.7.9 A 'one week to go' campaign was launched in the week commencing 21 January 2019 (the final week of the consultation) as a reminder, and to encourage as many people as possible, to provide feedback before the end of the consultation. As part of this the Applicant:

- Updated the Scheme webpage with a message 'one more week to have your say' and anyone that had signed up for 'website updates alerts' would have received a notification of this (in excess of 5,000 email addresses).
- Emailed a direct link to the online response form with a message 'one more week to have your say' to:
 - 400 attendees of the consultation exhibitions events that had signed up for 'updates on the Scheme'.
 - 252 respondents from the options consultation.

7.8 Social media

7.8.1 Social media was used to promote the consultation and consultation exhibitions events.

7.8.2 Tweets were sent from the Applicant's south-east account throughout the consultation period as detailed in **Table 7.8.1**.

7.8.3 A post was added to the Applicant's Facebook page on 28 February 2019 during the extension to the consultation (see **Figure 5.9.2**).

7.9 Feedback mechanisms

7.9.1 Throughout the consultation period, feedback was invited through a range of channels:

- **Online:** completing and submitting the response form online at www.highways.gov.uk/m25j28
- Completing the response form and returning it to **FREEPOST M25 junction 28 improvement scheme**.
- **Emailing** a response to info@highwaysengland.co.uk.
- Post: by writing to FREEPOST M25 junction 28 improvement scheme.

Table 7.9.1: Tweets timetable

Date/time	Content
05/12/2018 15:00	Come along to #M25J28 event happening now until 9pm @ Brentwood Holiday Inn. Have your say!
11/12/2018 09:00	Please come along #M25J28 event @ 9am - 9pm today at the CEME conference centre
13/12/2018 09:00	#M25J28 team are at Thurrock Services today 9-1pm come and see us. Have your say!
14/12/2018 09:00	#M25J28 team are at Romford Market today 8.30am to 4pm, come and say hi. Have your say!
15/12/2018 09:00	#M25J28 team are at Ingatestone Community Centre today 9-1pm come and say hi. Have your say!
17/12/2018 09:00	#M25J28 event today at MyPlace Romford 1pm - 9pm. Have your say!
08/01/2019 09:00	#M25J28 event today at the YMCA Romford 9am - 9pm. Have your say!
11/01/2019 09:00	#M25J28 team will be visiting Brentwood shopping centre car park today 10-3pm come say hi. Have your say!
12/01/2019 09:00	#M25J28 event today 1.30pm - 7pm at South Weald Parish Hall. Have your say!
17/01/2019 09:00	#M25J28 event today at Havering Town Hall 10.30am - 9pm. Have your say!
21/01/2019 09:00	#M25J28 consultation - 1 week left to have your say!

Figure 7.9.5: Tweet posted by Applicant



7.10 Period for comments

- 7.10.1 The end date for responses was 11.59pm on 28 January 2019. This was stated clearly on the consultation brochure and response form. Any responses that arrived after this date have also been considered and are included in this report to ensure a thorough consultation.

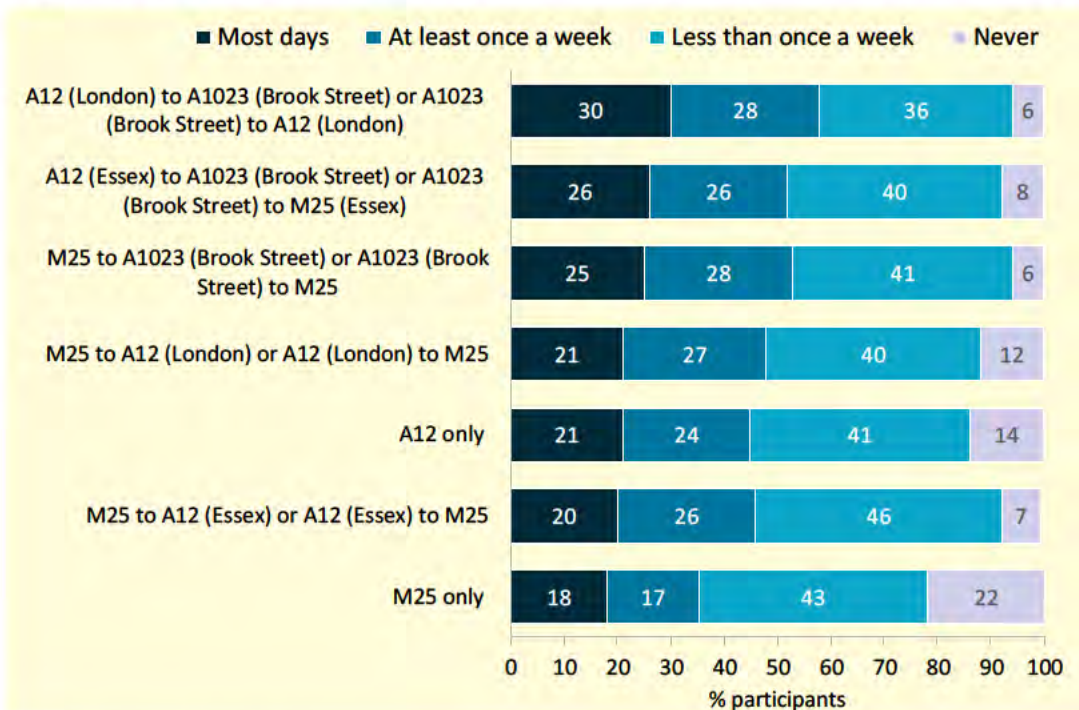
7.11 Consultation response analysis

- 7.11.1 Hard copy response forms were collected during consultation exhibitions and through the post. Once received they were date stamped and manually uploaded to the response form online in order to inform the overall analysis.
- 7.11.2 The online response form was hosted on the Applicant's Citizen Space portal that is used for all consultations.
- 7.11.3 All responses received during the consultation period were read and filtered into an 'action log' excel spreadsheet. This spreadsheet-based log formed the method for reviewing all responses by the discipline teams.
- 7.11.4 Two workshops took place on 1 March and 15 March 2019. Representatives from the following disciplines attended: environment, design, traffic modelling, safety, project management, planning and communications. The workshops facilitated discussions on the responses in a systematic and discipline-based format and agreement was reached with follow-up actions.
- 7.11.5 Outcomes from the workshops were logged within the spreadsheet, including the Applicants' response to the consultation responses. Where design changes were made, these have been recorded against the relevant sections and lines of the spreadsheet.

7.12 Responses from section 47 and section 48 consultees

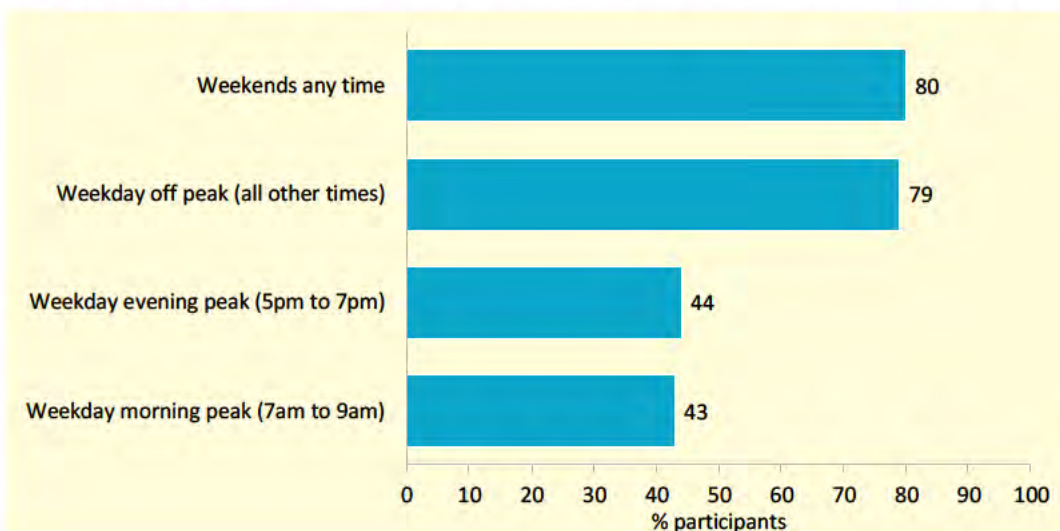
- 7.12.1 This section provides an overview of the section 47 consultation response results, key issues raised by consultees, and where applicable how the Scheme has been influenced and amended. As statutory community consultation under section 47 was undertaken in conjunction with the section 48 notices period, responses to both were received within the same deadline. Accordingly, details of the relevant responses received from members of the public in response to the publication of the section 48 notice are also addressed in this section.
- 7.12.2 The response form for both PiLs and the community consultees was the same. Therefore, this chapter includes a summary of the feedback and analysis of the response forms from both of these consultee groups.
- 7.12.3 In total 246 response forms were completed (both in hard copy and online) in response to the consultation (216 during the initial consultation period and a further 30 during the 28 day extension period). Three of these responses were from individuals identified in the section 42 consultee list, who also provided a long response in the name of their organisation, so the response form has been treated as an individual response as part of this analysis.
- 7.12.4 Responses from the section 47 consultation are set out in this section to reflect the sequence of the questionnaire.
- 7.12.5 As some questions in the response form had multiple answers, and others were free flow responses, the overall response rates shown in the following sections can sometimes add up to more than 100%.
- 7.12.6 Section A of the response form asked respondents about their travel habits around the M25 junction 28. This section was split into five questions.
- 7.12.7 Question A1 asked respondents which routes they took through the M25 junction 28 and how often. Figure 7.12.1 presents the results.

Figure 7.12.1: Graph showing questionnaire responses to question A1



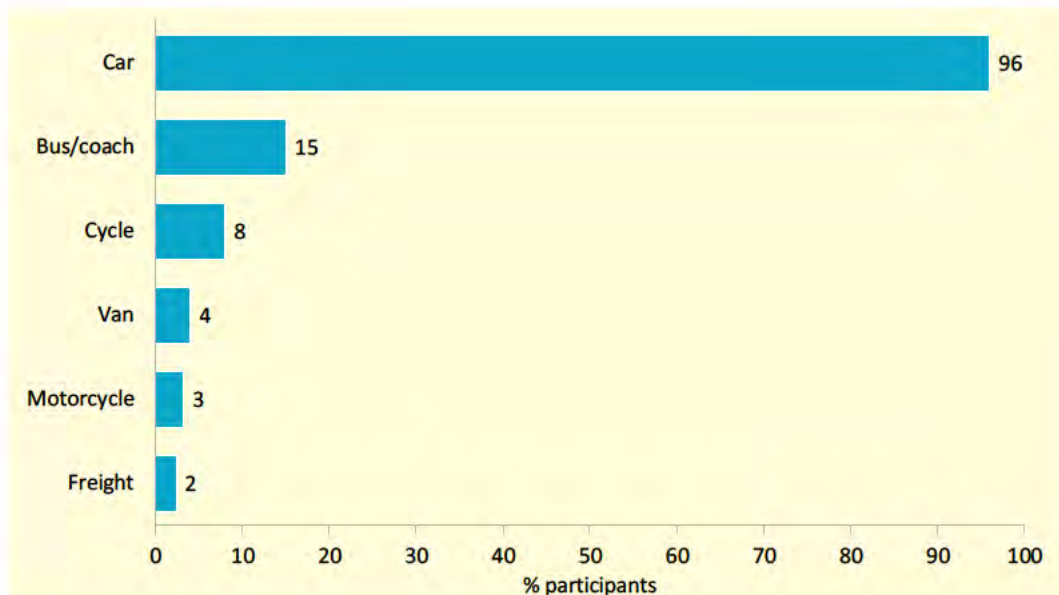
7.12.8 Question A2 asked respondents when they usually travelled. **Figure 7.12.2 presents the results.**

Figure 7.12.2: Graph showing questionnaire response to question A2



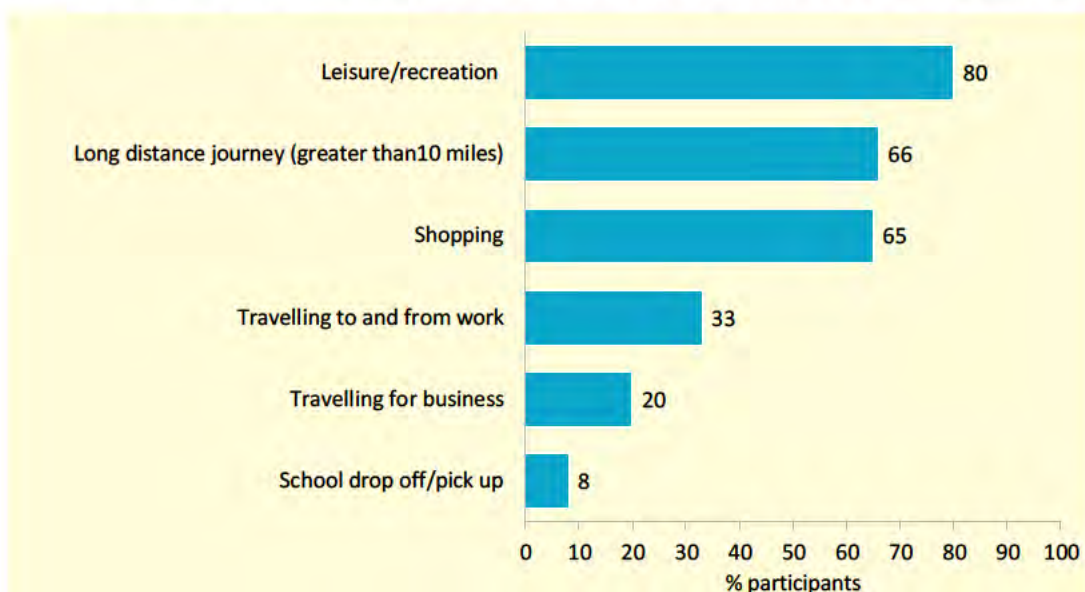
7.12.9 Question A3 asked respondents how they usually travelled through the M25 junction 28. Figure 7.12.3 presents the results.

Figure 7.12.3: Graph showing questionnaire responses to question A3



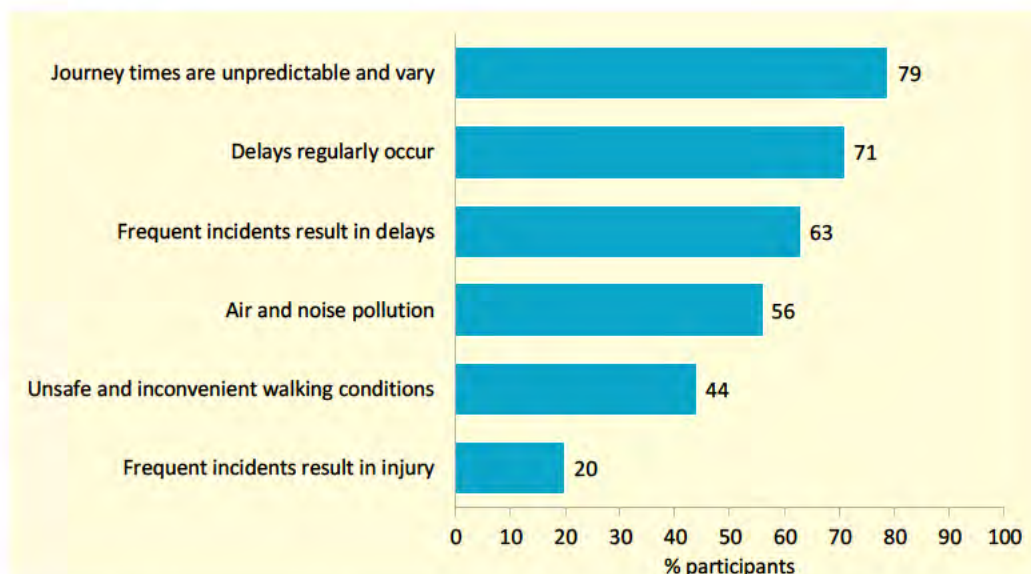
7.12.10 Question A4 asked respondents what they usually used the M25 junction 28 for. Figure 7.12.4 presents the results.

Figure 7.12.4: Graph showing questionnaire responses to question A4



7.12.11 Question A5 asked respondents what applied to their current travel conditions at M25 junction 28. **Figure 7.12.5** presents the results.

Figure 7.12.5: Graph showing those who agreed there were negative travel conditions

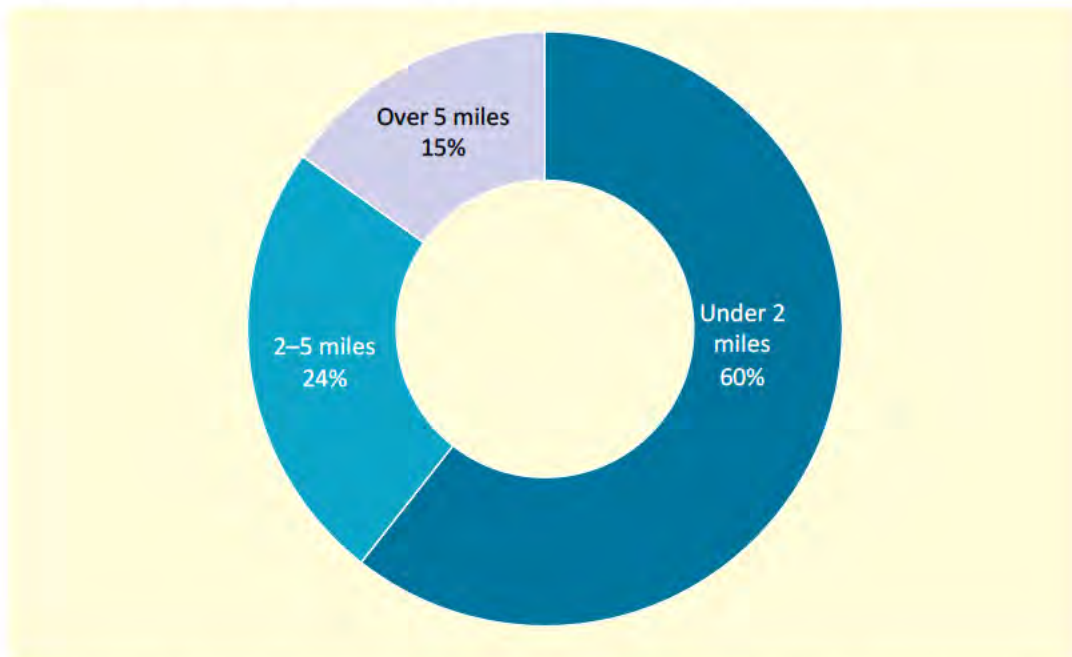


7.12.12 Twenty-four additional comments were received in relation to other current travel conditions. The number of respondents making each kind of comment were as follows:

- Six felt unsafe/inconvenient cycling conditions
- Six believed there were lane signage issues (accessing correct lane)
- Three felt there were unsafe or aggravating conditions (general)
- Three did not experience any difficulties
- Two explained there were issues from the A12 to M25
- Two had irregular delays
- Two cited the junction issues were due to surrounding roads

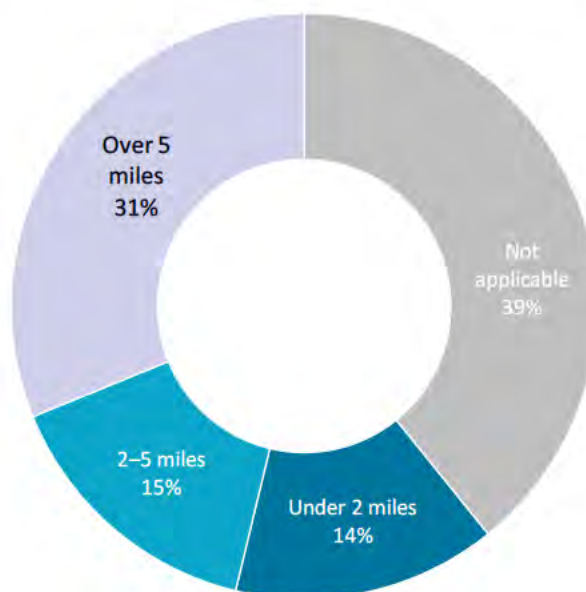
7.12.13 Question A6 asked respondents how close they lived to the proposed improvements. Figure 7.12.6 presents the results.

Figure 7.12.6: Graph showing questionnaire to question A6



7.12.14 Question A7 asked respondents how close they worked to the proposed improvements. Figure 7.12.7 presents the results.

Figure 7.12.7: Graph showing questionnaire response to question A7



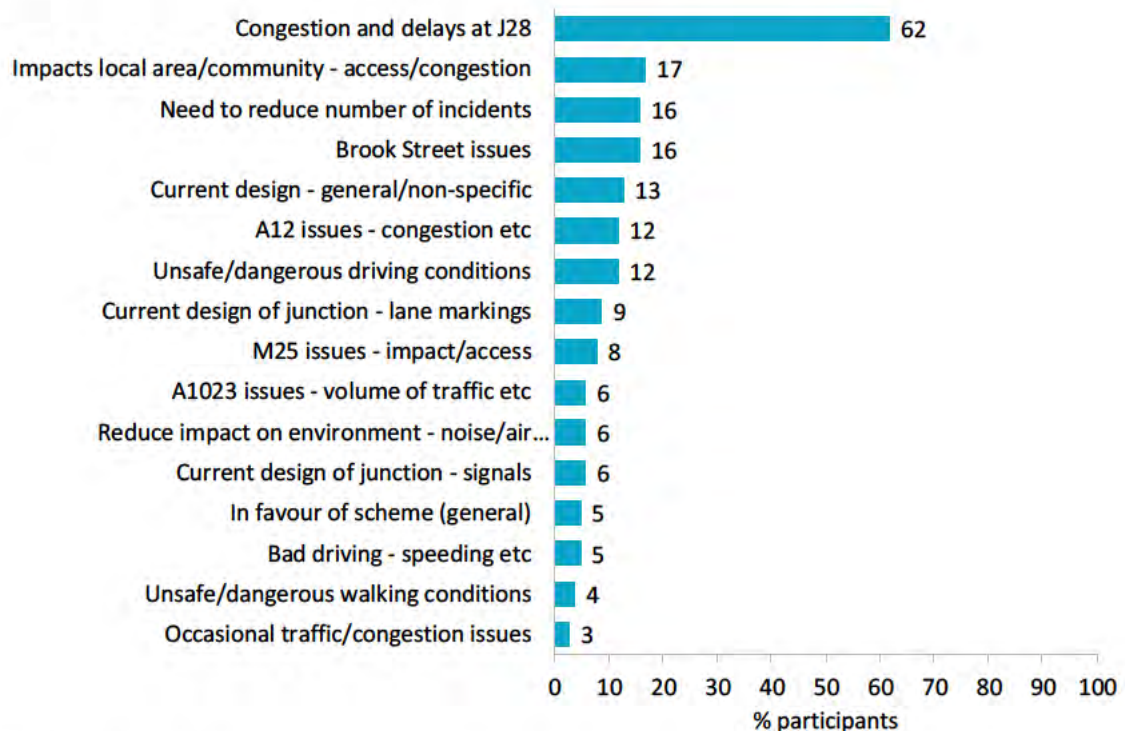
7.12.15 Section B of the response form asked respondents their views about the Scheme. This section was divided into the three questions.

7.12.16 Question B1 asked respondents if they thought there was a need to improve M25 junction 28. Respondents answered:

- Yes 88%
- No 12%

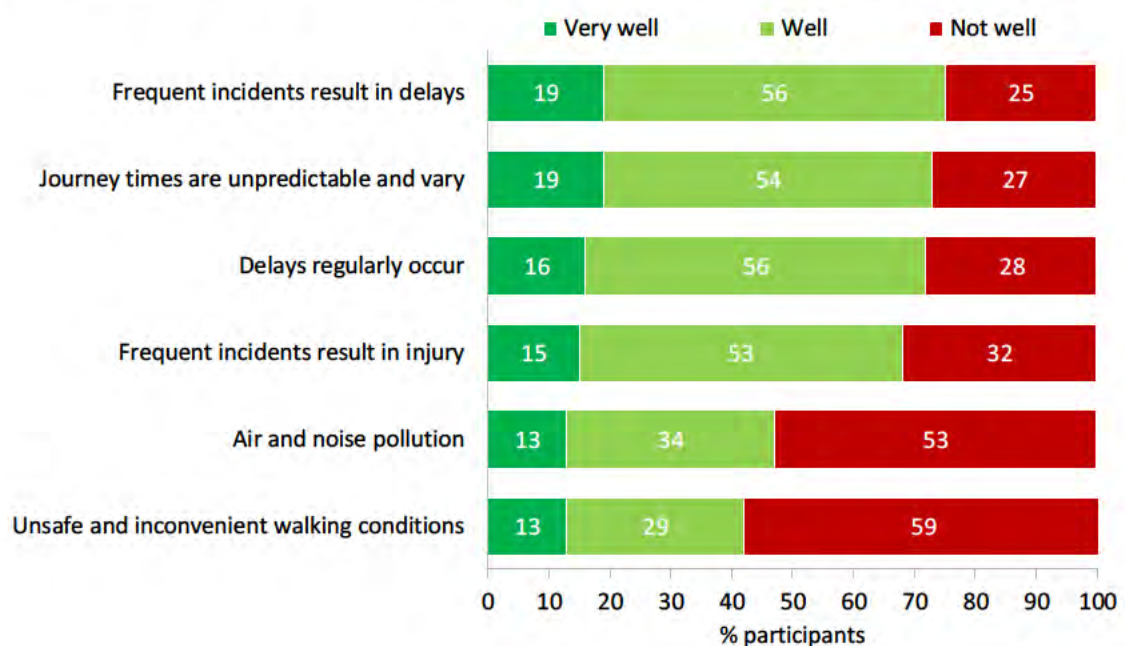
7.12.17 Respondents were then encouraged to explain their reasoning for their response to Question B1. Figure 7.12.8 presents the results.

Figure 7.12.8: Graph showing questionnaire response were respondents explained their reasoning for their response to question B1



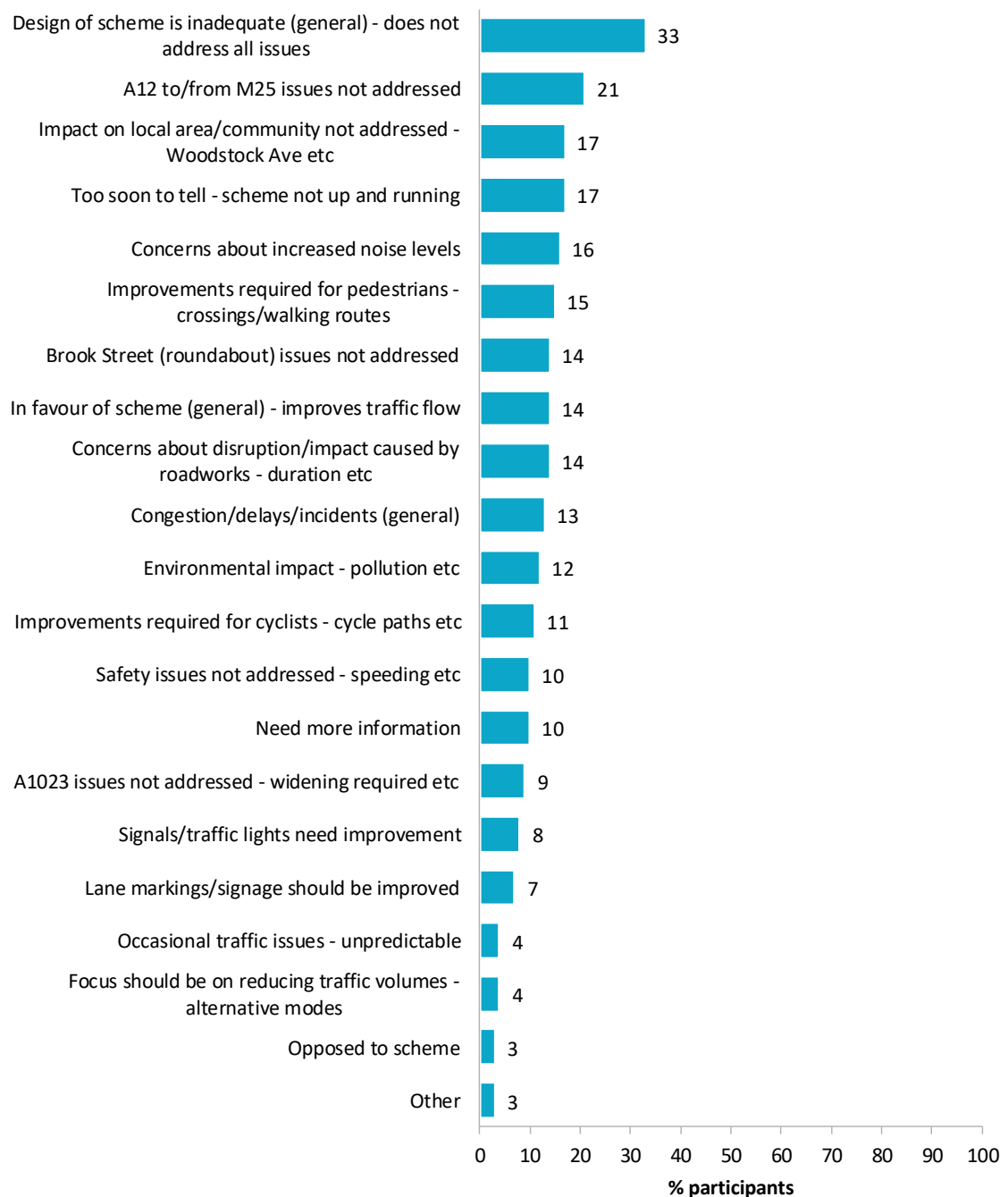
7.12.18 Question B2 asked respondents if our Scheme addressed the current travel conditions that they had identified in question A5. Figure 7.12.9 presents the results.

Figure 7.12.9: Graph showing questionnaire responses to question B2



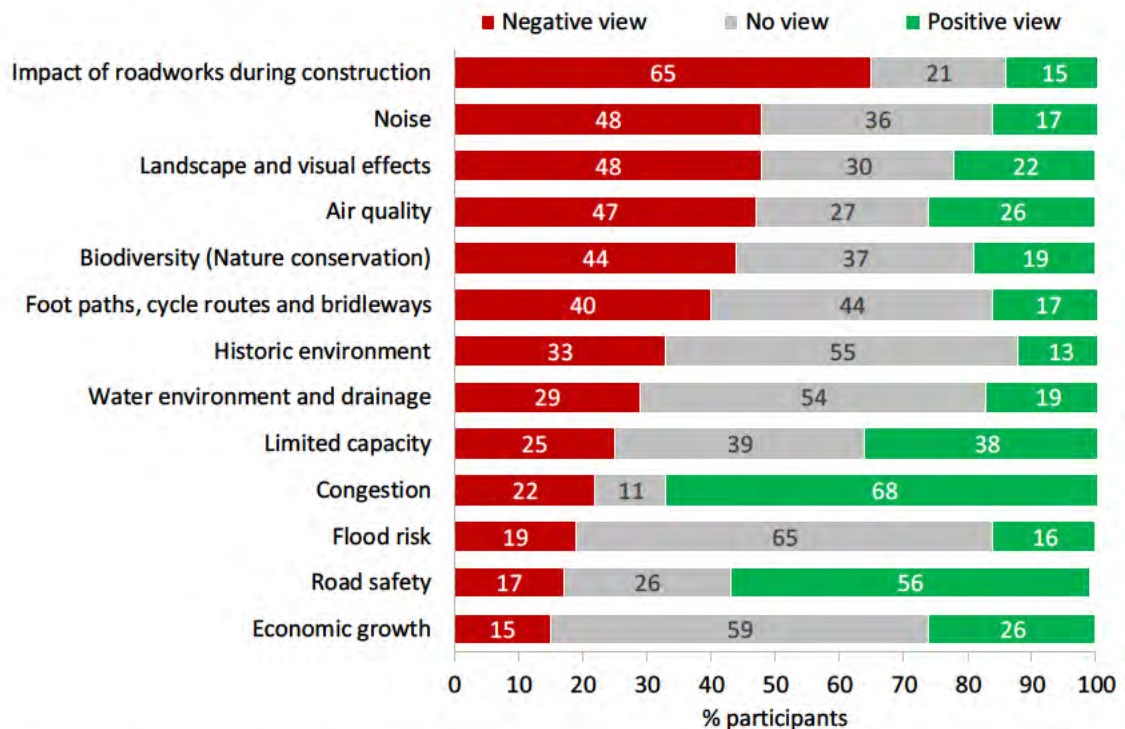
7.12.19 Respondents were then encouraged to expand on their answer to Question B2. Figure 7.12.10 presents the results.

Figure 7.12.10: Graph showing additional views on whether the scheme addresses current travel conditions.



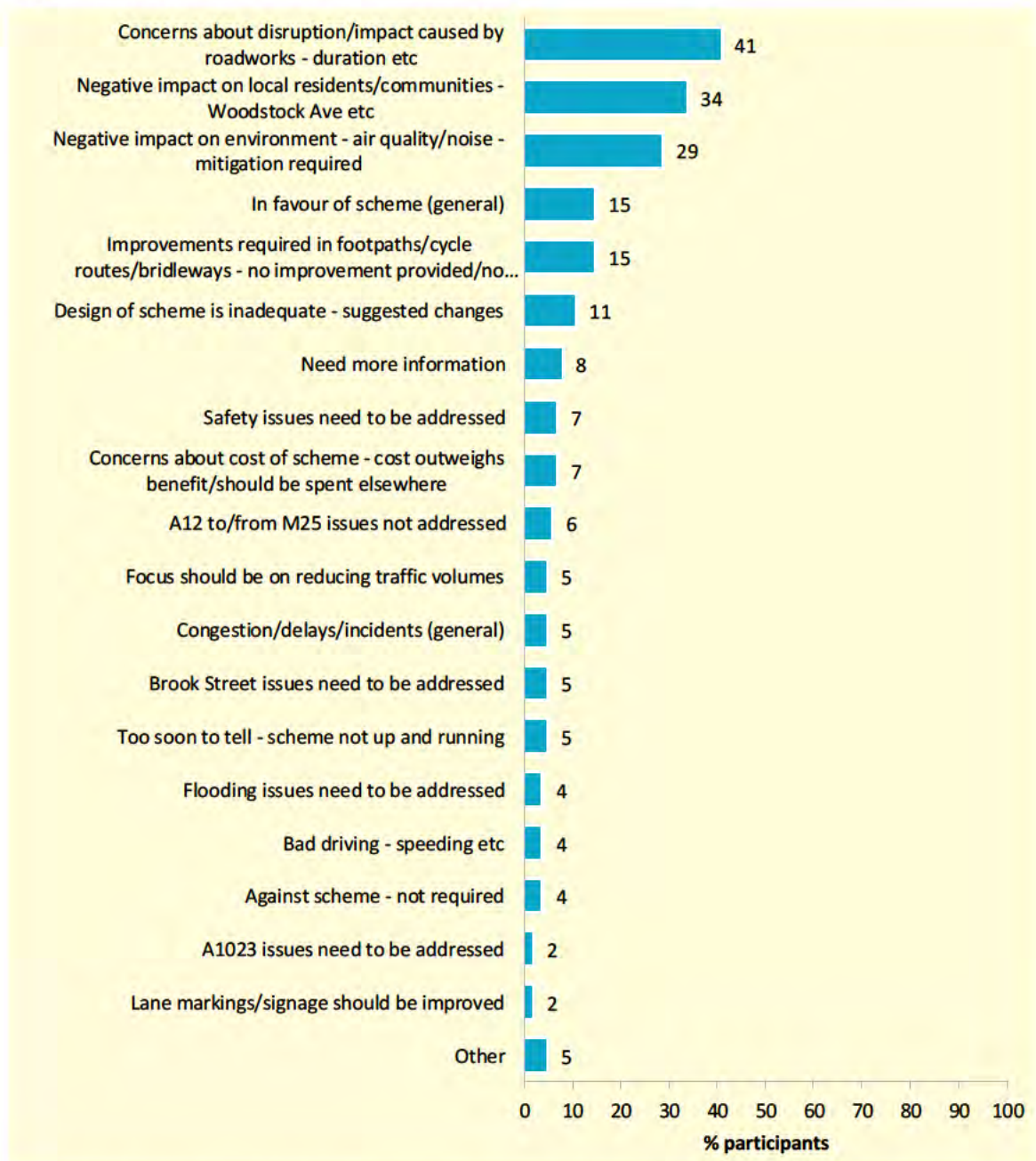
7.12.20 Question B3 asked respondents their views on the proposed improvement scheme. Figure 7.12.11 presents the results.

Figure 7.12.11: Graph showing questionnaire response to question B3



7.12.21 Respondents were then encouraged to expand on their answer to Question B3. Figure 7.12.12 presents the results.

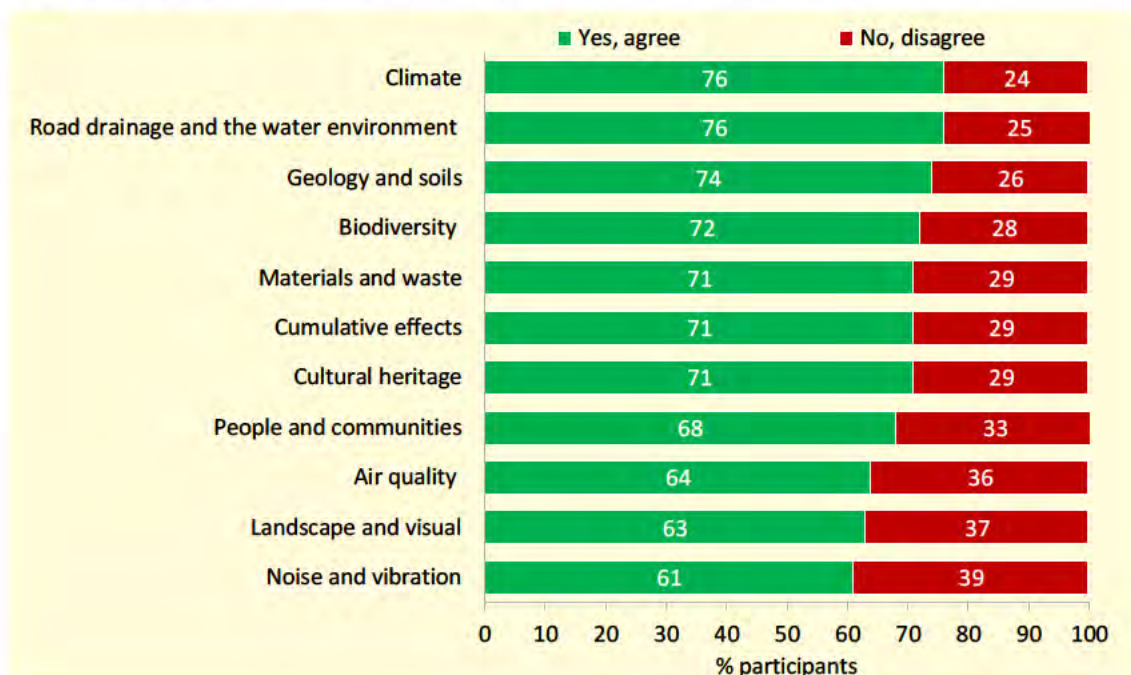
Figure 7.12.12: Graph showing additional views on the proposed improvement scheme



7.12.22 Section C of the response form asked respondents their views about the applicant's proposed approach to the potential environment impacts and contained just one question.

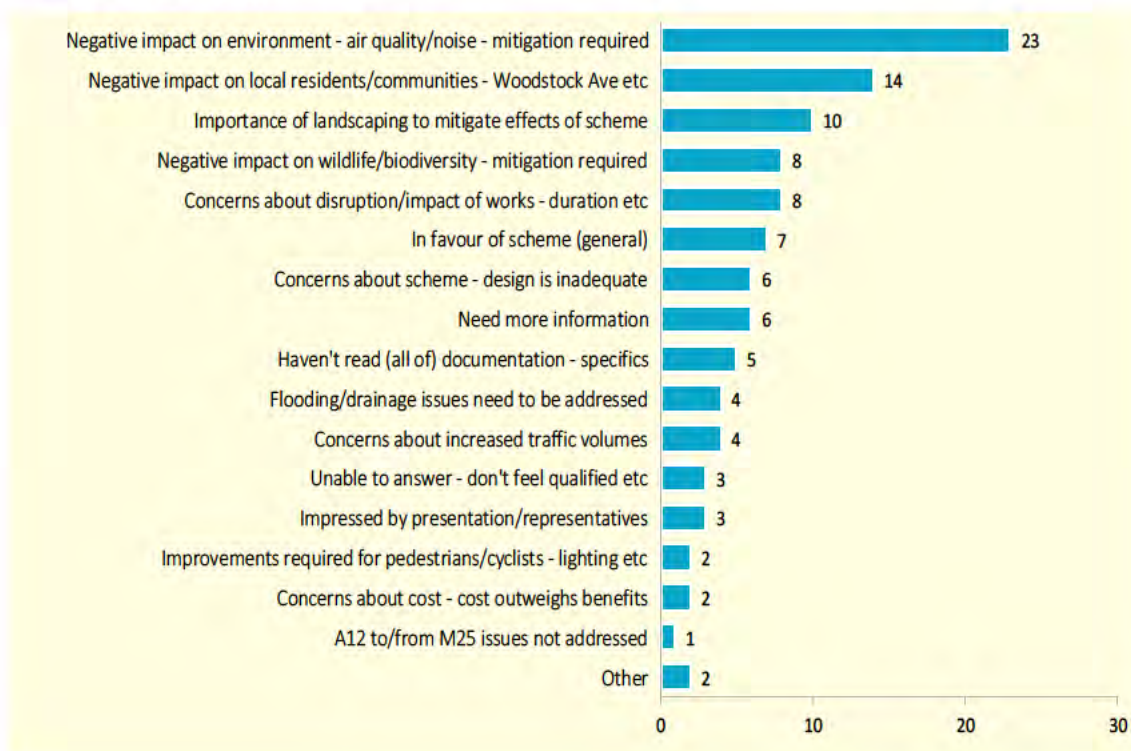
7.12.23 Question C1 asked respondents if they agreed with the Applicant's proposed approach to the potential environment impacts and the way it was addressing them. Figure 7.12.13 presents the results.

Figure 7.12.13: Graph showing responses to question C1



7.12.24 Respondents were encouraged to expand on the views expressed in C1. **Figure 7.12.14** presents the results.

Figure 7.12.14: Graph showing additional views on the proposed approach to the potential environmental impacts and the way that the Applicant is addressing them



7.12.25 Section D of the response form asked respondents about other matters the Applicant may need to consider. This section had two questions.

7.12.26 Question D1 asked respondents if there was something specific the Applicant needed to consider as it developed plans for construction. A total of 153 responses were received to this question. (As a free flow text box was provided, respondents could list more than one thing so response rates can total more than 100%):

- 36% of respondents were concerned about disruption or impact of roadworks.
- 30% of respondents believe the Scheme will negatively impact local residents and communities (including property value).
- 14% expressed concern about increased noise levels.
- 13% commented on the need for design improvements to Woodstock Avenue.
- 13% believed there would be a negative environmental impact including air quality, woodland and wildlife.
- 9% of respondents thought the Scheme was inadequate and did not address the issues.
- 9% commented on a need for improvements for pedestrians, cyclists and equestrians.
- 8% believed it did not address issues to and from the A12 and M25.
- 7% felt the Scheme was inadequate (in general).
- 6% thought A1023 issues need to be addressed.
- 5% believed safety issues needed to be addressed.
- 4% wanted better provision of communication.
- 4% felt the focus should be on reducing traffic models.
- 3% felt better consultation was required.
- 3% saw the importance of landscaping (to mitigate effects of the Scheme).
- 3% were in favour of Scheme (or some aspects of it).
- 3% had concerns about the cost of the Scheme.
- 3% thought the signals and traffic lights needed improving.
- 3% thought the lane markings and signage needed improving.
- 3% felt the Scheme was inadequate (did not address Brook Street issues).
- 3% needed more information on Scheme.
- 1% made no comment.
- 1% were against A12 expansion.

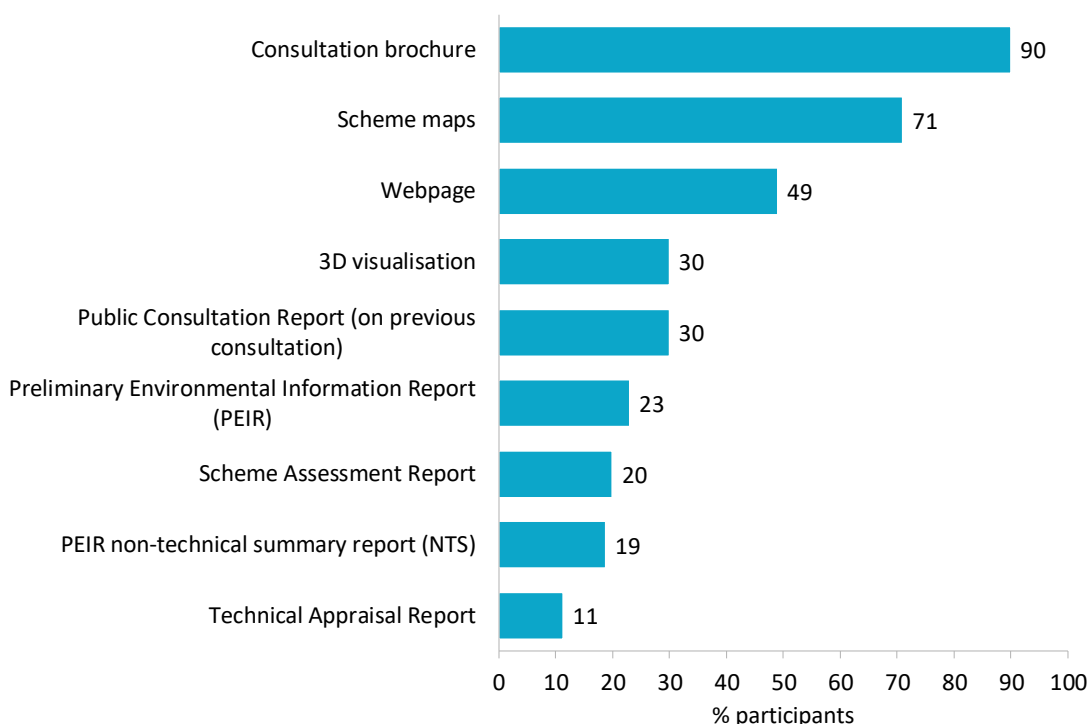
7.12.27 Question D2 asked respondents if they had any other comments about the proposed Scheme or its potential effects. A total of 89 responses were received to this question. As a free flow text box was provided, respondents could list more than one thing so response rates can total more than 100%.

- 28% of respondents believe the Scheme will negatively impact local residents and communities (including property value).
- 26% of respondents were concerned about the disruption or impact of the roadworks.

- 22% believed there would be a negative impact on the environment including air quality, woodland and wildlife.
- 20% expressed a concern about the increased noise levels.
- 16% were in favour of Scheme (improved traffic flow).
- 16% felt the A12 to and from M25 issues should be addressed.
- 15% felt the Scheme was inadequate and does not address all the issues.
- 13% commented on the need for design improvements to Woodstock Avenue.
- 7% thought the lane markings and signage should be improved.
- 7% felt the Scheme was inadequate and does not address Brook Street.
- 6% commented on the need for improvements for pedestrians and cyclists.
- 6% said safety issues needed to be addressed with cameras or input from transport police.
- 4% felt further consultation was needed.
- 4% needed more information.
- 3% expressed concerns about other road projects, for example Lower Thames Crossing.
- 3% believed signals and traffic lights needed improving.
- 2% were opposed to the Scheme.
- 2% felt the Scheme was inadequate (does not address all issues).
- 2% had concerns about the cost of the Scheme.
- 1% had concerns about increased noise levels.

- 7.12.28 Section E of the response form asked respondents about the consultation materials and other feedback. This was so the Applicant could consider the feedback to inform the presentation of future consultations. This section had four questions.
- 7.12.29 Question E1 asked respondents what consultation materials they used (respondents were able to choose more than one answer). Figure 7.12.15 presents the results.

Figure 7.12.15: Graph showing responses to question E1



7.12.30 Question E2 asked respondents if they found the consultation materials useful. Respondents answered:

- Yes – 91%
- No – 9%

7.12.31 Respondents were also provided with the opportunity to expand on their answer and explain why they perceived the consultation materials to be useful or not useful. A total of 62 respondents explained their answer.

7.12.32 Figure 7.12.16 presents the results. As a free flow text box was provided, respondents could list more than one thing so response rates can total more than 100%.

7.12.33 Question E3 asked respondents if they attended a consultation exhibition. Respondents answered:

- Yes – 44%
- No – 55%

7.12.34 Question E4 asked respondents how they found out about the consultation (respondents were able to choose more than one answer). **Figure 7.12.17** presents the results.

Figure 7.12.16: Graph showing reasons why the consultation materials were useful or not useful

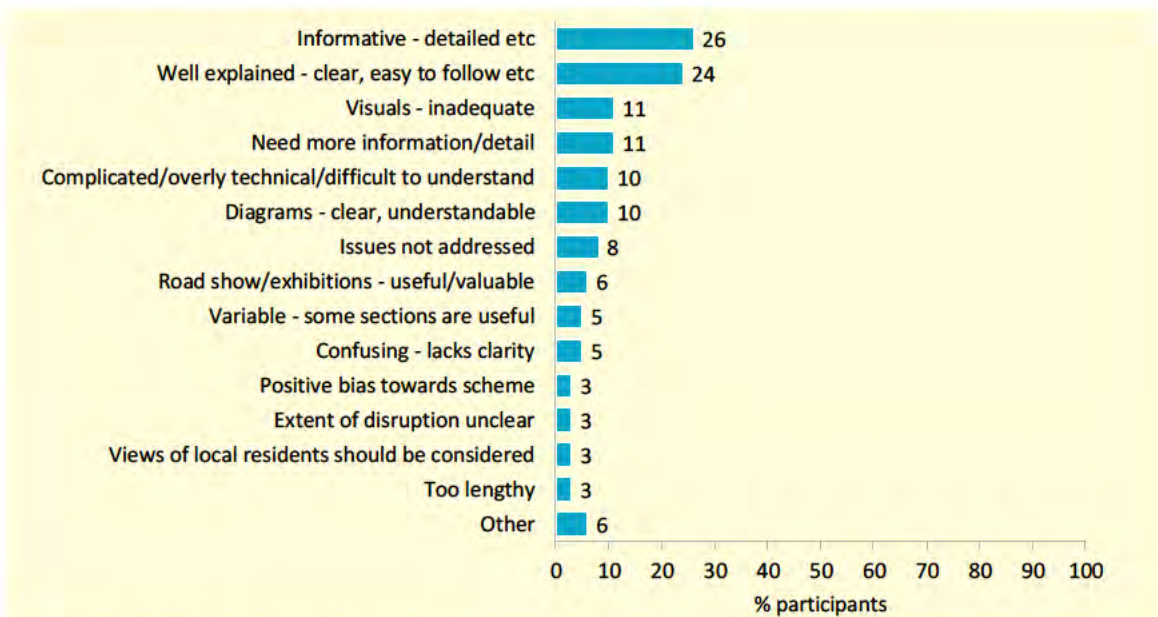
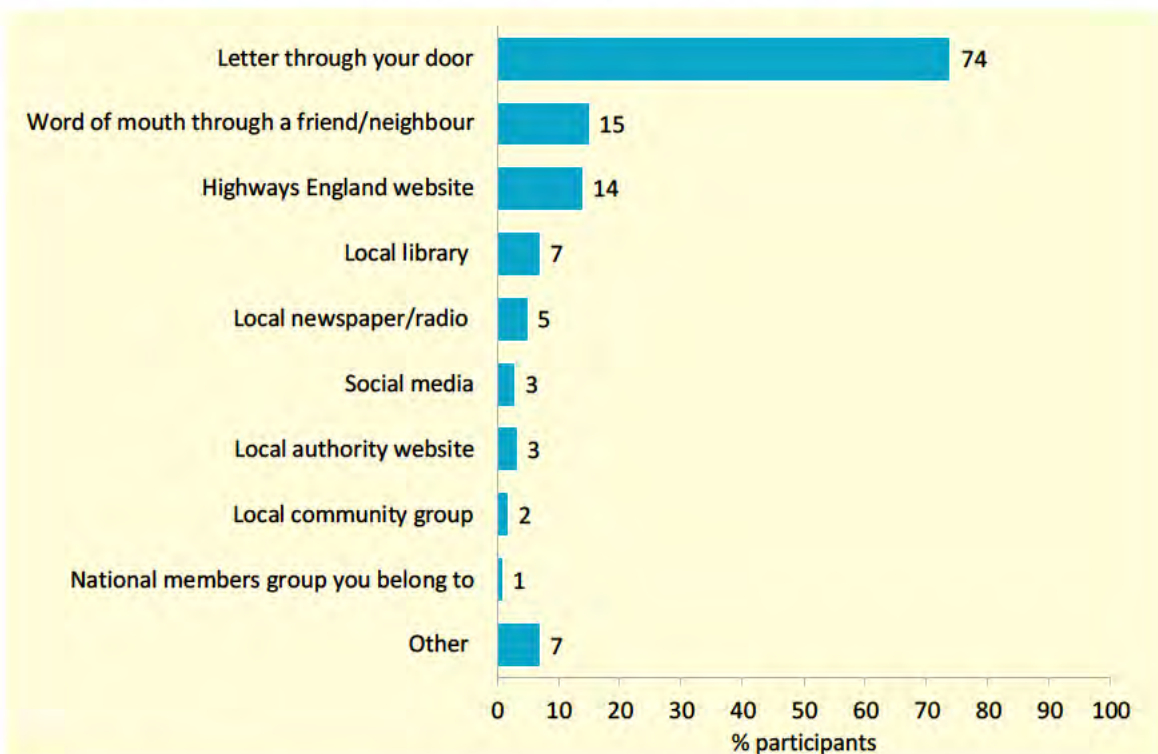


Figure 7.12.17: Graph showing responses to question E4



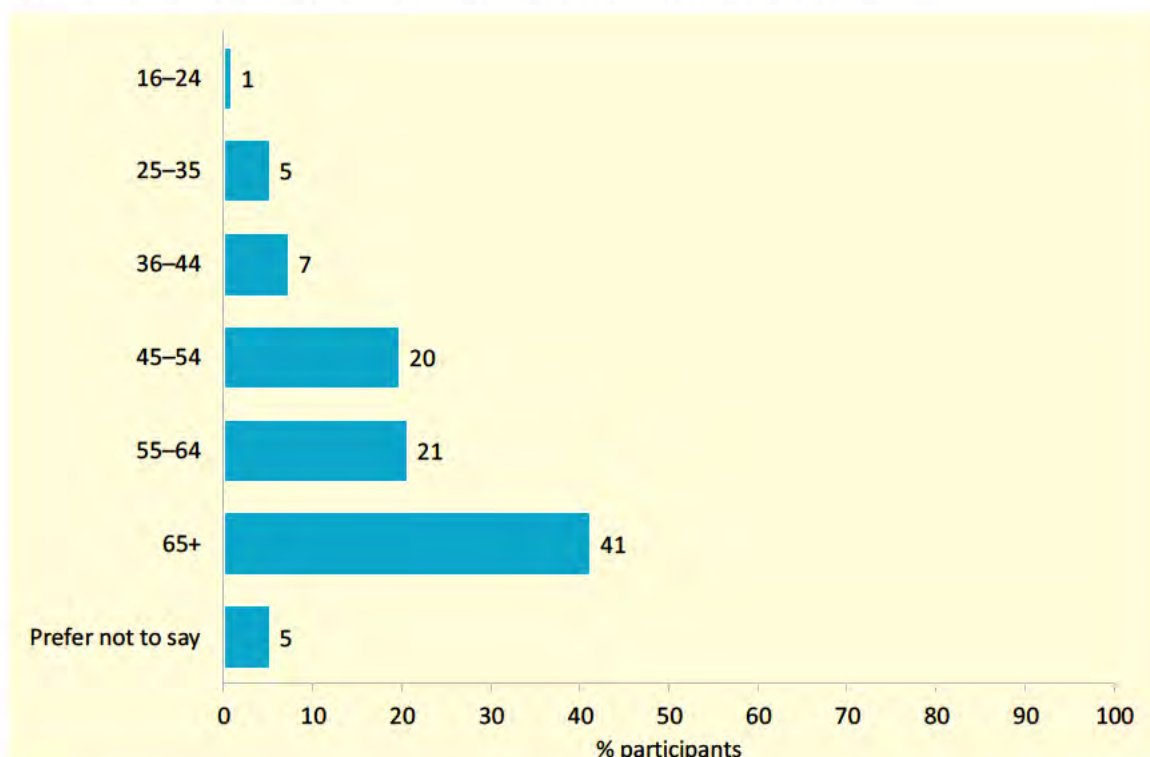
7.12.35 Section F of the response form asked respondents about themselves. This section had two questions.

7.12.36 Question F1 asked respondents if they considered themselves to have a disability. Respondents answered:

- Yes – 7%
- No – 88%
- Not answered – 5%

7.12.37 Question F2 asked respondents about their age and provided seven ranges to choose from. **Figure 7.12.18** presents the results.

Figure 7.12.18: Graph showing responses to question F2



7.13 Tabulated summary of responses from section 47 and section 48 consultees

7.13.1 From the overall consultation response forms returned the following summarises the topics and issues raised:

- In favour of the Scheme
- Scheme is inadequate
- A1023 issues need to be addressed
- In favour of the Scheme, but other concerns raised
- A12 to and from M25 issues should be addressed
- Concerns about construction works
- Concerns about disruption and impact of works
- Flooding and drainage
- Concerns about increased levels of noise and inconvenience
- Effects of other road projects
- Environment
- General comments
- Non-motorised users
- Land
- Lane markings and signage
- Lane widening
- Opposed to the Scheme
- Safety
- Traffic flow and management

- Utility and infrastructure
- Waste

7.14 Regard to section 47 and 48 responses

- 7.14.1 A full copy of the summary of tabulated responses from section 47 consultees outlining the topics raised, how the Applicant has had regard to the responses received is available in **Annex E6**. Some of the comments expressed support for the Scheme, others had mixed views, and some opposed the Scheme. **Table 7.14.2** summaries the concerns expressed.

Table 7.14.2: Summary of areas raised

Topic	How the Applicant has had regard to responses received (section 49)	The outcome
Concerns about the environment	The Applicant has undertaken an EIA of the Scheme and mitigation measures are proposed.	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).
Improvements required for pedestrians/cyclists	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 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.
A12 to/from M25 issues should be addressed	Other improvements to the junction are outside of the scope of the Scheme.	There is no change to the Scheme.
Concerns from residents in Woodstock Avenue about the access out of their road, particularly during construction	The Applicant has held a meeting with representatives from Woodstock Avenue, Essex CC and TfL to explain the constraints around making changes.	No change to the Scheme is proposed.

Topic	How the Applicant has had regard to responses received (section 49)	The outcome
Concerns about increased noise	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
Concerns about construction works and impact on health/quality of life	An assessment has been carried out following Highway England's DMRB guidance. 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 with the host authorities.
Concerns about construction impacts on the road network; works should be co-ordinated with Lower Thames Crossing works	The proposed traffic management arrangements for the construction of the Scheme will aim, where possible, to minimise disruption.	The Scheme will be subject to a traffic management plan that is also included as a requirement in the draft DCO (application document TR010029/APP/3.1).
Request to move the gantries somewhere less obtrusive into woodland	Where possible, the Scheme is seeking to minimise the impact on trees.	The currently proposed location of gantries has the smallest impact of woodland as compared to alternatives, and so no change is proposed.
Concerns about flooding	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 and the applicant's proposals to ensure flooding concerns are addressed (application document TR010029/APP/6.6).

7.15 Open format responses from section 47 consultees

- 7.15.1 In addition to the 246 consultation response forms received, 15 responses from section 47 consultees were received in the form of emails or letters. See **Table 7.15.1** for a summary of these responses.

7.16 Summary of changes

- 7.16.1 Following the section 47 consultation, the Applicant considered the consultation feedback received and the topics raised within that feedback. Regard was to the responses as the Scheme progressed, including through continued engagement and discussions with key stakeholders as explained in **Chapter 8** of this report.

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: - a dedicated third lane on A12 eastbound slip road to M25 northbound, avoiding traffic lights - dedicated lane for M25 south to A12 west traffic 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>	
	Respondent I raised severe concerns over impact from construction on residents of Woodstock Avenue & Kenilworth Avenue. Request junction at Maylands Golf Course to allow U-turn.	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>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 chapter 2 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>	

8 Ongoing Engagement and design changes to the Scheme between statutory consultation and supplementary consultation

8.1 Introduction

- 8.1.1 Following statutory consultation (February 2019) and up to the start of supplementary consultation (November 2019), the Applicant continued to engage with a number of key stakeholders (local authorities, utility companies, landowners and statutory environmental bodies). This engagement was non-statutory and is encouraged by paragraph 69 of the PA 2008: Guidance on pre-application process (former DCLG). In particular, it enabled the Applicant to continue dialogue with environment bodies, PiLs and others in order to discuss various issues in more detail. This section provides a summary of the engagement and changes made to the Scheme as a result of that engagement.

8.2 Local authorities

- 8.2.1 The Applicant has been keen to continue engagement with the host authorities and seek to resolve the issues that they raised at statutory consultation and gain their input into the development of the Scheme. Accordingly, monthly meetings have been held with each local authority individually and quarterly 'forums' with representatives from each host authority invited (Brentwood BC, LB Havering, Essex CC and GLA/TfL) to discuss common/strategic issues.
- 8.2.2 On 20 March 2019 following their responses to the statutory consultation expressing concern about access issues, a meeting was held with representatives from TfL and LB Havering and residents from Woodstock Avenue.
- 8.2.3 On 12 July 2019 a 'forum' meeting was held when representatives from Brentwood BC, LB Havering and Essex CC and were given an update on the Scheme design and programme update.
- 8.2.4 On 2 October 2019 all host authorities were offered a member briefing on the supplementary consultation. On 31 October 2019 Brentwood members were given a briefing on the Scheme, previous consultations and their outcome and the supplementary consultation. LB Havering members were due to receive a similar briefing, but that had to be postponed due to restrictions relating to the general election.
- 8.2.5 On 1 November 2019 a 'forum' meeting was held when representatives from Brentwood BC, LB Havering, Essex CC and TfL attended. The attendees were given a detailed briefing on the supplementary consultation (see **chapter 9** of this report), which included the distribution of consultation brochures and questionnaires.
- 8.2.6 Monthly meetings were held with relevant officers from:
- Brentwood BC on 15 April 2019, 29 May 2019, 26 June 2019, 20 August 2019, 23 September 2019, 31 October 2019, 26 November 2019

- LB Havering on 15 April 2019, 29 May 2019, 26 June 2019, 20 August 2019, 23 September 2019, 31 October 2019, 26 November 2019
- Essex CC on 15 April 2019, 29 May 2019, 26 June 2019, 20 August 2019, 23 September 2019, 31 October 2019, 26 November 2019

8.2.7 These meetings involved discussions on detailed matters, including feedback on the statutory consultation, an update on progress made with issues raised in their statutory consultation responses, the outcome of traffic modelling of the Scheme, design development such as the diversion of the underground gas pipeline and mitigation proposals, environmental impacts such as air quality and landscape and approach to supplementary consultation.

8.2.8 Emails were exchanged with the authorities to seek detailed information such as a list of developments for consideration in the cumulative effects chapter of the ES (March 2019) and their views on the scope of the Transport Assessment (August 2019).

8.3 PiLs

8.3.1 Following statutory consultation, it was agreed with Maylands Golf course that they would engage a golf course architect to assess the potential impact of the Scheme on the golf course and consider possible options for mitigating any impact. Consequently, the Applicant received an impact assessment from Maylands Golf Course on 26 April 2019. The Applicant then held a meeting with representatives from Maylands Golf Course on 9 May 2019 to discuss the report and the options outlined therein. Further discussions took place to ensure that all the possible options were being explored. An addendum to the original impact assessment was received on 17 July 2019 and a further meeting took place on 18 July 2019 to discuss that addendum and give the representatives of the golf course an update on the design (including the potential Cadent gas main diversion and environmental mitigation proposals). Meetings also took place with Glebelands Estates Limited and Grove Farm in August 2019 to provide an update on the Scheme.

8.3.2 On 17 September 2019 a site meeting was held with representatives of the developer of the proposed burial ground development planned for the Oak Farm site to provide an update on the Scheme and the proposed gas pipeline diversion. The discussion included identifying the site constraints, gaining better understanding as regards the timing of their development and briefing them regarding the Applicant's proposed supplementary consultation. There was also correspondence regarding survey work and In November 2019 a letter was sent to the owners of the Oak Farm development site requesting access to undertake intrusive survey, this was followed by consent from them to allow access.

8.3.3 On 3 October 2019 a meeting was held with the residents of the Caravan Park at Putwell Bridge to provide an update on the Scheme, particularly the gas pipeline diversion and supplementary consultation.

8.4 Utility companies

8.4.1 Regular meetings were held with Cadent Gas throughout 2019 to consider the options for the gas pipeline diversion, including the identification of possible environmental and land use constraints. The extent of survey work to progress the possible diversion was considered, and the land requirements were

discussed along with the presentation of material in the supplementary consultation.

- 8.4.2 A meeting was held with BPA in June 2019 to discuss potential impacts on their pipeline and to ensure appropriate protective measures.
- 8.4.3 Meetings were also held with National Grid (April and June 2019) to discuss the proposed Scheme and the required clearance between the new slip road and overhead transmission lines.
- 8.4.4 Meetings were held with UK Power Networks (September and November 2019) to discuss the proposed diversion of their 11kV overhead line.

8.5 Statutory environmental bodies

- 8.5.1 Ongoing engagement was undertaken with the EA throughout 2019 to inform the development of the Scheme, particularly in respect of the WFD requirements, the FRA outcomes, updates on ground investigations and regarding the supplementary consultation. This engagement took a variety of forms, including teleconference meetings with the EA on 12 August 2019, 24 September 2019 and October 2019. A face to face meetings took place on 16 April 2019 and a site meeting was also carried out with the EA on 23 May 2019.
- 8.5.2 On 22 July 2019 a request was sent to GLAAS asking for confirmation that the WSI for the Geotech Watching Brief was suitable for the GI works. Confirmation was received from GLAAS on the WSI. GLAAS requested that they be kept informed of Scheme developments.
- 8.5.3 A request was made in 2019 to start discussions with Natural England regarding the Scheme and related matters, such as licencing for protected species and the HRA. Further discussions will be held if required.

8.6 Changes to the Scheme between statutory consultation and supplementary consultation

- 8.6.1 Changes were made to the Scheme between statutory consultation and supplementary consultation. These changes were as a result of ongoing stakeholder engagement, further environmental assessments and design work and took account of the feedback received at statutory consultation stage. These are outlined in **Table 8.6.2**.

Table 8.6.2: Key changes to the Scheme since statutory consultation

Change	Reason for change
Development of mitigation proposals	Proposed mitigation measures were identified as a result of further environmental assessments being undertaken. This included a biodiversity assessment that highlighted the environmental impact on the Ingrebourne Valley SMI. In addition to this, other assessments established the visual impact of the new loop road and the potential impacts this may have for Maylands golf course.

Change	Reason for change
Weald Brook mitigation works – realignment	Change proposed to enhance the watercourse following further design refinement and consultation with the EA.
High-pressure gas main diversion – revised alignment	Further assessments and discussions with Cadent Gas identified that the existing pipeline is not strong enough to sustain the load of the new loop road, therefore a diversion is required.
Locations for construction and satellite compounds identified	The proposed locations of the two compounds were identified having regard to existing utility infrastructure, the need to provide safe access and exit from the A12, the floodplain of the watercourses, existing land uses and maintaining accesses to local properties and businesses.
A12 eastbound exit road was redesigned	To overcome constraints including overhead electricity lines, the watercourse and an underground pipeline.
Realignment of a section of the Ingrebourne River and lowering ground levels.	To compensate for the detrimental effect that the proposed Grove culvert extension would have on this water body.
Drainage ponds and access tracks locations identified	Design refinement confirmed the location of three drainage ponds and associated maintenance tracks were identified.
Amendment of location of replacement gantry north of the proposed M25 northbound on-slip	The red line boundary was extended northwards to accommodate a new proposed gantry on the M25 to minimise potential impacts that would arise to Maylands Golf Course.
Identification of need to potentially use existing access track (north of the A12 and east of the M25)	To minimise disruption the Applicant has considered using an existing access from Wigley Bush Lane rather than creating a new access from it.

9 Supplementary consultation

9.1.1 The Applicant undertook a supplementary consultation from 4 November to 2 December 2019 (29 days) to focus on proposed changes to the Scheme design following statutory consultation listed in **Table 8.6.2** and also to report on newly identified environmental impacts. The aims of the consultation were to:

- consult landowners who had been identified since statutory consultation as a result of ongoing due diligence
- to provide prescribed consultees with the opportunity to comment on the changes to the Scheme.
- consult with any stakeholder that had an interest in the Scheme.
- enable consultees' feedback to be taken into consideration in the Scheme development.

9.1.2 Whilst this consultation was not of itself a statutory consultation, new section 42 consultees had been identified at this stage and so the opportunity was taken to invite them to comment on the matters that were raised at statutory consultation, in addition to those being raised as part of the (non-statutory) supplementary consultation.

9.2 Scheme proposals for supplementary consultation

9.2.1 As set out in **Paragraph 8.6**, following statutory consultation the Applicant also developed the Scheme design and undertook further engagement with third parties. The Applicant also undertook further environmental assessments, including an aboricultural survey. From this, the Applicant developed plans to take into account key infrastructure in the area and identified further measures to mitigate the effects of the Scheme.

9.2.2 The aboricultural survey identified the presence of 15 veteran trees within the red line boundary, with three of these trees directly impacted by the Scheme.

9.2.3 Design changes were possible to avoid the removal of one veteran tree, but further design and construction alterations to avoid all veteran trees was not feasible, mainly due to highways design and road safety requirements. Therefore, the Applicant consulted on the proposal that the Scheme would involve:

- the removal of two veteran trees
- protective measures to eight of the identified veteran trees during construction works (these are in the Outline CEMP).

9.2.4 The remaining five veteran trees within the Scheme red line boundary were not considered to be directly impacted.

9.2.5 The removal of the two veteran trees was a newly identified ecologically significant effect resulting from additional baseline information rather than a change in design so information on the veteran trees was included in the supplementary consultation material and formed part of the consultation.

9.2.6 Further details of the changes to the Scheme and newly identified impacts are described in the supplementary consultation brochure and response form (see Annex F1).

9.3 Who was consulted and material provided

9.3.1 As a result of the extension of the red line boundary, there were a number of newly identified PiLs who had not been consulted as part of the statutory consultation.

9.3.2 Those consulted and details of the material provided to them are identified in **Table 9.3.1**.

Table 9.3.1: Consultees and materials provided at supplementary consultation

Consultee	Consultation materials provided
New PiLs category 1 and 2 (as defined by the section 44 of the PA 2008) as a result of the proposal.	Letter informing them of the consultation enclosing a supplementary consultation brochure and response form. They were also sent a section 48 notice, a consultation brochure and response form for the statutory consultation. The letter also invited them to a 'drop in' session on 7 November 2019 to give them the same opportunity to comment on the Scheme in line with the requirements of the PA 2008
New PiLs category 3 (as defined by the section 44 of the PA 2008).	Letter informing them of the consultation and enclosing a supplementary consultation brochure and response form, and a section 48 notice
PiLs consulted at statutory consultation (unless no longer applicable)	Letter informing them of the consultation and enclosing a supplementary consultation brochure and response form
Consultees as prescribed by Regulation 3 and Schedule 1 of the APFP Regulations	Letter informing them of the consultation and enclosing a supplementary consultation brochure and response form
Local authorities (within section 43 of the PA 2008) and Greater London Authority	Letter informing them of the consultation and enclosing a supplementary consultation brochure and response form
Respondents to statutory consultation and options consultation	Letter informing them of the consultation and enclosing a supplementary consultation brochure and response form
Attendees to any statutory consultation exhibitions (that did not respond but requested to be kept informed of updates on the Scheme)	Letter informing them of the consultation, and enclosing a supplementary consultation brochure and response form

Consultee	Consultation materials provided
Local MPs	Letter informing them of the consultation, and enclosing a supplementary consultation brochure and response form
Any other stakeholder in the consultation database (at statutory consultation)	Letter informing them of the consultation, and enclosing a supplementary consultation brochure and response form

9.4 Consultation materials and channels

9.4.1 The Applicant displayed the full suite of statutory consultation materials (**Paragraph 5.7**), as well as new supplementary consultation materials that included; overview of key scheme changes plan (**Annex F2**), red line boundary plan (**Annex F3**), and the consultation brochure and response form, in the following libraries (and details of this were included in the letters):

- Romford Central Library
- Brentwood Library
- Chelmsford Library

9.4.2 This approach mirrors that taken for the consultation materials at the local display locations at statutory consultation as detailed in the published SoCC.

9.5 Publicising the consultation

9.5.1 A supplementary consultation notice (**Annex F4**), informing members of the public about the supplementary consultation and where information was available, were placed in the following three newspapers during the week commencing 28 October 2019:

- Brentwood Gazette
- Romford Recorder
- Essex Chronicle

9.5.2 The Scheme webpage www.highwaysengland.co.uk/m25j28 was updated with all supplementary consultation information, and an online response form was also available.

9.5.3 All supplementary consultation letters were sent by post on 30 October 2019, or by email on 31 October and 1 November 2019, copies are available in **Annex F5**.

9.6 Feedback mechanism

9.6.1 Response forms were accepted online through the Applicant's Citizen Space portal that is used for all consultations and via a freepost address (FREEPOST M25 junction 28).

9.7 Summary of feedback

9.7.1 A total of 21 responses were received:

- 20 were received electronically
- one used the paper consultation form
- Five were from PiLs (Section 42(1)(d) and 44 consultees)
- 16 were from other consultees.

9.7.2 Nine questions were asked about the proposed scheme changes through open-ended text responses. These were reviewed and coded into themes in order to assess the types of views expressed. The findings presented in the report have been analysed based on the number of participants who answered each question. Accordingly, the bases presented in the report vary.

9.7.3 As there were 21 responses, the findings could not be considered to be statistically robust. All data is therefore reported as frequencies and not percentages. **Table 9.7.1** summarises the main topics raised, and a full tabulated summary of responses can be found in **Annex F**.

9.8 Tabulated summary of responses from section 42(1)(a) (prescribed consultees) and 42(1)(b) (local authorities).

9.8.1 **Table 9.8.1** summarises consultee responses and identifies issues raised, how the Applicant has had regard to the response and how any action arising was taken forward.

9.8.2 Where the consultation response was a statement for consideration by the Applicant, the table below notes the Applicant's consideration of that statement and records 'Not applicable' in the final column. A full copy of the responses from all section 42 consultees is available in **Annex F**.

Table 9.8.1: Key topics raised by consultees from supplementary consultation and actions taken by the Applicant

Topic	Summary of consultee responses	How the Applicant has had regard to the response received	The outcome
Environmental Impacts	New respondent: concern raised of the negative impact on local residents and communities with regards to noise and pollution.	An assessment of noise and vibration impacts and the need for noise mitigation has been carried out. Similarly, effects on air quality have also been assessed.	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. 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).
	Respondent O: concerns about flooding and the history of flooding in the area	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).
	Respondent E: it is vital to protect species/habitat	The Applicant has undertaken an EIA of the Scheme and mitigation measures are proposed.	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).

Topic	Summary of consultee responses	How the Applicant has had regard to the response received	The outcome
	Respondent I: more trees should be planted to mitigate impact	Consideration has been given to avoiding the loss of trees where possible and mitigation has been identified and includes proposals for replacement planting.	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). The REAC (application document TR010029/APP/7.3) sets out all the mitigation measures proposed as part of the Scheme.
Weald Brook mitigation works	Respondent E: the course of Weald Brook should not be altered	The course is being altered to mitigate the impact of the Scheme and in line with discussions with the EA.	Chapter 8 of the ES (application document TR010029/APP/6.1) sets the impact on the water environment and the approach to this proposed mitigation.
	Respondent O: wildlife and trees should not be affected	Where possible, the Applicant has tried to limit the impact on wildlife and trees. The assessment and proposed mitigation measures are detailed in chapter 7 of the ES (application document TR010029/APP/6.1)	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). 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).
High-pressure gas main diversion	Respondent H: diversion not necessary	The Applicant has had ongoing discussions with Cadent Gas, and it has been determined that the gas	A proposed alignment for the gas pipeline diversion has been identified with Cadent Gas based on environmental considerations, safety and impacts on landowners. This is

Topic	Summary of consultee responses	How the Applicant has had regard to the response received	The outcome
		pipeline does needs to be diverted.	shown on the works plan (application document TR010029/APP/2.3).
	New respondent: negative impact of diversion on Woodstock Avenue – noise and traffic	An assessment on noise and vibration impacts has been carried out as part of the EIA for the Scheme and negligible effects are predicted from the implementation of the Scheme during the operational phase.	Chapter 6 of the ES (application document TR010029/APP/6.1) contains the assessment on Noise and Vibration. The TA also looks at journey times and considers the impact of the Scheme on the wider road network, both during construction and operation.
	Respondent N: concerns about safety with the proposed diversion of the existing underground gas pipeline	Noted and the necessary safety precautions with the diversion will be undertaken.	Protective provisions are included in the draft DCO (application document TR010029/APP/3.1) for the protection and safety of electricity, gas, water and sewage undertakers.
Proposed location for both construction and satellite compound	Respondent N: concerns about impact and size of construction/ compounds	The size of the proposed compounds has been carefully determined to ensure that they are sufficient to enable construction works to take place.	The construction compounds will be in situ on a temporary basis and the Outline CEMP (application document TR010029/APP/7.2) outlines measures to mitigate the impacts during construction. The site will be restored to reasonable satisfaction of owners in accordance with the provisions of the draft DCO (application document TR010029/APP/3.1).

Topic	Summary of consultee responses	How the Applicant has had regard to the response received	The outcome
	Respondent O: use existing compound at junction 27 – should be returned to original use	The location of the proposed compound has been identified so that it can facilitate the construction works as expediently as possible whilst minimising the impact on the environment and surround road network.	The construction compounds will be in situ on a temporary basis and the Outline CEMP (application document TR010029/APP/7.2) outlines measures to mitigate the impacts during construction. The site will be restored to reasonable satisfaction of owners in line with the draft DCO.
	Respondent L: important to ensure safety of water courses	The Applicant is mindful of the close proximity to Weald Brook and Ingrebourne River and avoiding any harmful impact.	The Weald Brook and Ingrebourne River are identified as sensitive areas and mitigation measures are outlined in the Outline CEMP (application document TR010029/APP/7.2).
Ingrebourne River and Ingrebourne Valley mitigation works	Respondent M: 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. Flood compensation areas are being provided as shown on the Works plans (application document TR010029/APP/2.3).	The impact of the Scheme on flood risk is addressed in the FRA (application document TR010029/APP/6.6).
Drainage ponds and access tracks	Respondent M: flooding issues – unresolved	The Applicant submitted the flood modelling data for EA review and confirmed that	The impact of the scheme on flood risk is addressed in the FRA (application document TR010029/APP/6.6).

Topic	Summary of consultee responses	How the Applicant has had regard to the response received	The outcome
		the Scheme has been designed to a minimum 1 in 100 year.	
	Respondent F: better drainage for roundabout required and surrounding area	The Applicant carried out an assessment of drainage effects and shared the WFD and HAWRAT with the EA and considered their feedback in the finalisation of the documents.	Details can be found in the Drainage strategy report submitted in support of this application (application document TR010029/APP/6.8). Further details of the WFD compliance assessment (application document TR010029/APP/6.7) and the HAWRAT can be found in Chapter 8 of the ES (application document TR010029/APP/6.1).
	Respondent H: protection from Traveller occupation required	Noted and there will be locked gates to the access tracks.	The Works plans (application document TR010029/APP/2.3) outlines the restricted access along the tracks.
Location of replacement gantry	Respondent M: should not be relocated if tree felling/destruction of habitat required	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	The work undertaken is reported in the Arboricultural Impact Assessment Report that forms part of the ES (application document TR010029/APP/6.3) and the REAC (application document TR010029/APP/7.3).

Topic	Summary of consultee responses	How the Applicant has had regard to the response received	The outcome
		to provide the least environmental impact.	
	Respondent B: should have signage - be visible to road users	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	Respondent C: negative effect on traffic volume/noise - school run etc.	Noted but it has been decided that this part of the Scheme is no longer required.	N/A
	Respondent C: negative effect on surrounding area/roads - farms, businesses etc.	Noted but it has been decided that this part of the Scheme is no longer required.	N/A
	Grange Brook Estates Ltd: concerns about unauthorised vehicle access to private land - security risk	Noted but it has been decided that this part of the Scheme is no longer required.	N/A
	Respondent O: disruption to wildlife	Noted but it has been decided that this part of the Scheme is no longer required.	N/A
	Respondent L: no payment should be made to French's	Noted but it has been decided that this part of the	N/A

Topic	Summary of consultee responses	How the Applicant has had regard to the response received	The outcome
	Farm – doesn't have planning permission	Scheme is no longer required.	
	Grange Brook Estates Ltd: track not suitable for proposed traffic	Noted but it has been decided that this part of the Scheme is no longer required.	N/A
Further comments	Respondent H: scheme is inadequate - congestion 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.	Further information about congestion is provided within the Transport Assessment Report, (application document TR010029/APP/7.4).
	Respondent B: diagrams are unhelpful confusing / inaccurate.	All consultation materials have been available in a variety of formats and adhere to accessibility standards.	N/A
	Respondent E: no archaeological site/artefacts should be disturbed	Noted	Chapter 11 of the ES (application document TR010029/APP/6.1) addresses cultural heritage and the archaeological impacts of the scheme.

Topic	Summary of consultee responses	How the Applicant has had regard to the response received	The outcome
	Fusion Eaterie Ltd: concerns about impact of works on local area/residents/businesses	Noted	Chapter 13 of the ES (application document TR010029/APP/6.1) addresses people and communities and comments on the Scheme's impact on local businesses.
	New respondent: concerns about access for pedestrians/cyclists - safety etc.	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 considered and the results of that assessment are reported in the People and Communities (Chapter 13) of the ES (application document TR010029/APP/6.1).	Any improvements, if a case can be made for their delivery, would be funded separately from the Scheme.
	Respondent J: additional road markings/traffic lights required	Noted	There will be a review, at detailed design stage, of the existing road markings and traffic lights within the Scheme's red line boundary.
	New respondent: concerns about cost-effectiveness of scheme - estimate is extreme	Noted	The objectives of the Scheme are to reduce congestion and delays, as well as improve journey time reliability through the junction during peak and off-peak periods. The

Topic	Summary of consultee responses	How the Applicant has had regard to the response received	The outcome
			<p>Scheme would address safety issues, reducing the high occurrence of accidents. Highways England are committed to providing a cost-effective scheme and value for money.</p> <p>The Case for the Scheme (application document TR010029/APP/7.1) details the economic case.</p>
	Respondent K: Brook Street roundabout/M25 traffic should be a priority	Noted.	Highways England will continue to liaise with Essex CC and Brentwood BC to assist them in identifying a longer-term solution to this issue.

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	Brentwood BC 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	Essex CC - 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	FC - 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	Essex CC 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	EA – 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.
	EA - 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>LB Havering 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. LB Havering 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.
	LB Havering 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	Essex CC - 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.
	Essex CC - 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	Essex CC 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	EA - 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.	Noted – initial ground investigation works have been undertaken and informed the design.	This is referred to in Geology and Soils Chapter of the ES (application document TR010029/APP/6.1).
	EA - 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	The Applicant engaged with EA on this matter and shared the WFD with the EA prior to the formal submission of the application.	Further details can be found in the WFD assessment submitted in support of this application (application document TR010029/APP/6.7).

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	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.		
	LB Havering welcome the inclusion of drainage ponds. Highways England should engage with the EA and the relevant landowner should ensure maintenance	The Applicant has engaged with the EA on this topic.	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).
	LB Havering request clarification that Highways England would maintain the access tracks.	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.	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.
Duty to cooperate	Continued joint working between Brentwood BC and Highways England is required in order to	Noted	Noted and agreed

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	understand the implications of growth in the wider area on the strategic highways network.		
Further analysis	<p>Essex CC required further data/analysis to:</p> <ul style="list-style-type: none"> • identify impact to Essex and surrounding area; • establish projected increase in traffic; • establish implications/sensitivity on transport movements across strategic network; • understand project delivery timescales and cumulative impacts; • understand sustainable transport provision for both construction and operation; • understand impact on Brook Street traffic; • understand implications on public footpath 	Noted	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).

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
Gas pipe diversion	LB Havering 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.
	LB Havering 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.
	EA 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	LB Havering - 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	Essex CC - 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>	investigation into potential improvements at the junction 28 Brook Street roundabout.	improvements at the junction 28 Brook Street Roundabout. These types of improvements would be funded and delivered separately from the Scheme.
Impacts to vehicular traffic and congestion	Brentwood BC 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.	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.	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.

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	It is noted that this Scheme has come forward at this stage in order to secure funding however Brentwood BC remain concerned by the likelihood of multiple and long-term disruption in the area as a result of numerous improvement projects.	The Applicant will seek to minimise disruption during construction.	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.
Ingrebourne River	LB Havering 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.	Noted.	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).
	LB Havering welcome the amendments to the water course and creation of wet grassland	Noted	Noted
	LB Havering - Important that green infrastructure features in the landscape and ecological mitigation	Noted	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

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
	plan. LB Havering wish to be involved in the development of the landscape design and species choice.		document TR010029/APP/3.1) addresses landscaping.
	Works are supported. Consent will be required from the EA .	Noted	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.
Ingrebourne River/Woodstock and Kenilworth Avenue	LB Havering - Vital that vehicles exiting Woodstock Avenue and Kenilworth Avenue are not subject to an unacceptable diversion route in order to travel westbound.	Noted	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.
Interaction with NG apparatus	National Grid - 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.	Noted	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).

Topic	Summary of consultee response	How the Applicant has had regard to the response received	The outcome
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	FC - 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. FC 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.
	FC - 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).
	FC - 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.

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.
Mitigation Area	LB Havering - Impact on Great Crested Newt (GCN) and Bats is unclear. Therefore, need further discussion regarding appropriate mitigation	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.
	LB Havering would encourage the mitigation proposals to be intertwined	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.
	LB Havering - 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.	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	Brentwood BC support the mitigation proposals and mitigation proposals for Weald Brook	Noted	N/A
	Brentwood BC 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.	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 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.
	Brentwood BC will continue to engage and provide feedback regarding the environmental, traffic, and construction management impacts of the gas main diversion	Noted	Noted
	Brentwood BC encourages Highways England to take all reasonable measures to protect all the veteran	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	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

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).
	Brentwood BC 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	FC 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	LB Havering 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
	LB Havering request confirmation as to whether the modifications to the existing gantry on the southbound side of the M25 are still required.	Yes. The proposal is to replace existing signage to announce the new junction.	This would form part of the authorised development listed in Schedule 1 of the draft DCO (application document TR010029/APP/3.1).
Response Times	Changes not expected to affect London Fire Brigade 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.	Noted	The preparation of Traffic management plans is secured by requirement 10 of the draft DCO (application document TR010029/APP/3.1).
Scheme construction	Essex CC - 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	Noted and the details available at the time of submission will be reported in the ES.	Details of the construction of the Scheme are available in chapter 2 of the ES (application document TR010029/APP/6.1).
Traffic forecasts	Essex CC are pleased to note that the latest traffic forecasts include LTC	Noted and where possible, consideration will be given	The TA (application document TR010029/APP/7.4) submitted in support of the DCO application sets out the

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	LB Havering - no comment as the location falls in Brentwood District Council	Noted	Noted
Veteran trees	<p>FC 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>	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.

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	LB Havering welcome the amendments to the water course	Noted	Noted
	EA 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
	EA - Flood storage compensation to be provided on a level for level and volume for volume basis	Noted	Noted
Weald Brook/Veteran trees	LB Havering - 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.
	LB Havering 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.	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.
	LB Havering would welcome discussions regarding the protective measures to be implemented to 8 other veteran trees.	Noted	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. The mitigation measures are secured via the REAC (application document TR010029/APP/7.3).
Working in proximity to assets	National Grid - 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).

9.9 Changes made to the Scheme following supplementary consultation

- 9.9.1 **Table 9.9.1** provides a summary of the key changes the Applicant has made to the Scheme as a result of continued engagement with key stakeholders following supplementary consultation.

Table 9.9.1: Summary of key changes following supplementary consultation

Change raised	Reason for change made
Identification of preferred route for gas mains diversion.	Further assessment work was undertaken, and a preferred route selected, enabling the area of land affected to be significantly reduced from that shown at supplementary consultation.
Golf course mitigation area	The preferred alignment for the proposed diversion of the underground gas pipeline and its associated easement has potential to impact the second tee of the golf course in the future, and as a result accommodation works are now proposed to enable the relocation and reconfiguration of the second tee.
Potential use of existing access tracks	The access track and associated land take on the eastern section of the A12 (near Frenches Farm) is no longer required, and the red line boundary has been drawn back accordingly.

9.10 Engagement following supplementary consultation

- 9.10.1 Stakeholder engagement continued following the close of the supplementary consultation on 3 December 2019.

9.11 Local authorities

- 9.11.1 On 13 December 2019, the Applicant met with Essex CC and Brentwood BC to provide an update on traffic modelling and the assessment of the impacts on Brook Street.
- 9.11.2 On 2 March 2020, the Applicant held an all day workshop to outline the draft DCO documents and explain the process that would take place following submission of the DCO application, including the role of the local authorities. Following this workshop, the draft DCO documents have been shared with the host authorities and Transport for London including the DCO, explanatory memorandum, Land plans and Works plans, and their comments have been sought.

9.12 PiLs

- 9.12.1 On 29 January 2020 a site meeting was held with the developers of the Gardens of Peace (burial ground) development proposed at Oak Farm to give them an update on the preferred gas main diversion and seek information regarding how the public will access and use their development site in the future.

9.13 Utility companies

- 9.13.1 On 20 December 2019 a meeting was held with Cadent Gas to discuss the proposed alignment of the gas pipeline diversion. Face to face meetings have been held on 12 December 2019 and 24 January 2020 to discuss the preferred route, easement and construction programming. Draft DCO documents, including the DCO, Land plans and Works plans have been shared with utility companies.

9.14 Statutory environmental bodies

- 9.14.1 On 17 December 2019 a meeting was held with the EA to discuss the HAWRAT.

10 Targeted consultation

- 10.1.1 The Applicant undertook a targeted consultation from 31 January to 27 February 2020 to seek views on proposed changes to the red line boundary for the Scheme since the supplementary consultation described in **Chapter 9** took place.
- 10.1.2 Whilst an extension of red line boundary was proposed, this was localised and no new Category 1 or 2 persons were identified. Therefore, this consultation was conducted as a non-statutory targeted consultation under the PA 2008. In determining how to conduct the consultation, the Applicant had regard to the former DCLG 'Guidance on the pre-application process' (March 2015), and in particular paragraphs 75 and 76:
- If the application only changes to a small degree, or if the change only affects part of the development, then it is not necessary for an applicant to undertake a full re-consultation. Where a proposed application is amended in light of consultation responses then, unless those amendments materially change the application or materially changes its impacts, the amendments themselves should not trigger a need for further consultation. Instead, the applicant should ensure that all affected statutory consultees and local communities are informed of the changes (paragraph 75).
 - In circumstances where a particular issue has arisen during the pre-application consultation, or where it is localised in nature, it may be appropriate to hold a non-statutory targeted consultation (paragraph 76).
- 10.1.3 This consultation related directly to measures being proposed by the Applicant to mitigate the likely impact of the Scheme on Maylands Golf Course.
- 10.1.4 The purpose of the consultation was to seek the views of LB Havering, Luddington Golf Limited, who run Maylands Golf Club, and those with an interest in the land proposed to be incorporated into the DCO boundary.
- 10.1.5 As explained in Chapter 9, the preferred alignment for the diversion of the existing underground high pressure gas pipeline was identified in late 2019. The proposed route alignment for the diversion would run directly beneath the tee on the second hole of Maylands Golf Course. Whilst construction techniques have been proposed that would involve minimal disruption to the playable course during construction of the diversion, future maintenance of the pipeline, once installed, could lead to the temporary closure of the second hole with resulting effects on the playability of the Course.
- 10.1.6 With a view to avoiding future disruption to the Course arising from the presence of the diverted gas pipeline, the Applicant has sought to include additional land within the DCO boundary in order to facilitate the relocation and reconfiguration of the second hole. This proposal would remove any potential future conflict as between the operation of the Course and the maintenance of the diverted gas pipeline. As such, the Applicant proposed an extension of the red line boundary to enable reconfiguration of the second hole to be delivered.

10.1.7 The aims of the consultation were to:

- consult the affected landowner on the proposed inclusion of the identified land within the DCO Boundary
- consult with the Golf Club regarding the proposal to secure additional land to facilitate the relocation and reconfiguration of the second hole of the course
- consult with the local authority regarding the proposal above.

10.2 Who was consulted

10.2.1 Having regard to the proposed extension of the red line boundary, and the purposes of the consultation, three consultees were identified to be consulted as identified in **Table 10.2.1**. The table also identifies the consultation materials that were provided to each consultee.

Table 10.2.1: Consultees and materials provided at targeted consultation

Consultee	Consultation materials provided
Glebelands Estates Limited	<ul style="list-style-type: none"> • letter informing them of the consultation • a targeted consultation plan showing the proposed DCO boundary • a plan illustrating the proposed changes to the DCO boundary, by reference to the red line boundary as illustrated at the supplementary consultation (undertaken in autumn 2019)
L B Havering	<ul style="list-style-type: none"> • letter informing them of the consultation • a targeted consultation plan showing the proposed DCO boundary • a plan illustrating the proposed changes to the DCO boundary, by reference to the red line boundary as illustrated at the supplementary consultation (undertaken in autumn 2019)
Luddington Golf Limited	<ul style="list-style-type: none"> • letter informing them of the consultation • a targeted consultation plan showing the proposed DCO boundary • a plan illustrating the proposed changes to the DCO boundary, by reference to the red line boundary as illustrated at the supplementary consultation (undertaken in autumn 2019), and in addition to • a drawing showing the Applicant's indicative design for the proposed relocation and reconfiguration of the second hole of the course

10.3 Consultation materials and channels

10.3.1 All targeted consultation letters were sent by courier delivery on 31 January 2020, and copies are available in **Annex G**. The deadline for responses was

Thursday 27 February 2020. As such, the Applicant allowed 28 days for the consultees to respond.

10.3.2 With regards to the indicative design for the proposed relocation and reconfiguration of the second hole that the Applicant presented to Maylands Golf Club, the Applicant has:

- liaised with Cadent Gas to minimise the impact of the diverted gas pipeline on the Golf Course
- engaged an independent golf course architect to advise on the potential reconfiguration of the second hole, with a focus on achieving a playable Course and with consideration of safety, walking distance and maintaining the character of the Golf Course
- given consideration to environmental and ecological features local to the Golf Course that are also being addressed as part of the Scheme
- sought to minimise the impacts of any land take of relevant landowners.

10.3.3 The Applicant has been mindful of the potential impact on the golf course and has engaged with representatives from Luddington Golf Limited during the development of the Scheme (see section 8.3.1 of this report). The assessment report (and addendum) produced on behalf of the Luddington Golf Limited were also taken into account.

10.4 Summary of feedback received and how the Applicant has had regard to those responses

10.4.1 Two responses were received from the three parties consulted. The matters raised in these responses, and details of how the Applicant has had regard to those responses, are summarised in **Table 10.4.1**.

10.4.2 These responses included a letter, and an enclosure entitled Wellers Design technical note and assessment from Luddington Golf Limited and an email from LB Havering. (See **Appendix G2**).

Table 10.4.1 Summary of topics raised

Topic	Summary of consultee response	How the Applicant has had regard to responses received	The outcome
Distance of walk to third tees and associated safety concerns	<p>Maylands Golf Club</p> <ul style="list-style-type: none"> proposed second tee has been rotated to point north east but the result is a long and unacceptable (in operational terms) walk of up to 170m (186yds) to the next tee complex. concerns over safety of golfers walking straight back into the hitting zone of the proceeding golfers playing the second tee. safer routes have been looked at, but these are problematic because of the newt buffer zone around the existing pond. It has to be assumed that an access pathway across the buffer zone would not be acceptable and, as a consequence of this, a pathway would have to run either north or south of the buffer zone. Both routes would be circa 280m (306yds) which is not acceptable (slowing up play, tedious and lowering the quality of the course). 	<p>The proposed design for the relocation and reconfiguration of the second hole as presented to the Golf Club would result in a longer walking distance than that currently experienced by users of the course as the Club has suggested. However, the Applicant has developed its proposal for the relocation and realignment of the second hole having careful regard to numerous factors.</p> <p>The design presented to the Club was prepared having regard to historic discussions between the Applicant and the Club and the designs previously presented by Weller Design. However, it also took account of the need to minimise land take and the future presence of the diverted gas pipeline and the desire to avoid its alignment as well as other environmental constraints within the locality. There is a need to avoid existing newt ponds and the design presented had been developed</p>	<p>The Applicant considers that the proposed layout for the relocation and reconfiguration of the second hole represents an acceptable design solution having regard to all relevant factors but will work with the Club to further refine the proposed route for users of the Course walking to the third tee from the new second hole in order to minimise delay.</p>

Topic	Summary of consultee response	How the Applicant has had regard to responses received	The outcome
		<p>taking all of these factors into account.</p> <p>With regards to the safety aspects of the proposed new configuration, it is acknowledged that it would not be permissible for players to tee off from the new second hole until those who had completed playing the hole had reached the third tee. Whilst this would result in minor delay to play, this type of playing restriction is not an unusual feature of golf courses and its control can be readily managed by the Club through the imposition of the necessary rules of play / bylaws.</p> <p>The Club has also raised concerns about the implications of the newt buffer zone for the walking distance from the second hole to the third tee and the need for users of the course to walk around this constraint.</p> <p>The Applicant is looking at possible options for the walking route to pass through the newt exclusion zone, for instance by installing a raised boardwalk for</p>	

Topic	Summary of consultee response	How the Applicant has had regard to responses received	The outcome
		this purpose. This would enable users of the course to avoid walking back around the exclusion zone to the second tee and create a more direct route to the third tee, thereby reducing the walking distance and any delay which might otherwise arise.	
Proximity to existing pond buffer zone	Maylands Golf Course - the green is in close proximity to the existing pond buffer zone. Concern that unfair hazard to golfers playing the hole (a relatively long par 3). Uncut grass in an area that is characteristically damp for a long period of the year will result lengthy searching and lost balls which will be both frustrating and lead to slow play.	<p>The Club has raised concerns about the proximity of the proposed new second hole to the existing newt pond and its associated buffer zone.</p> <p>The proposal does not envisage this area forming part of the playable course. It would form a rough rather than a managed fairway. This is not an unusual feature of a par 3 hole and the proposal is considered to represent a hole of similar difficulty and playability to the existing hole 2.</p> <p>Planting is proposed in this area and earth works are considered to be required. The planting would be developed with biodiversity needs in mind and a</p>	The Applicant considers that the proposed siting of the second hole adjacent to the newt buffer zone will not affect the difficulty or playability of the hole and proposes to work with the Club to further refine the proposed planting solution for that area, having regard to its biodiversity importance and the requirements of Natural England. Any bylaws relating to out of bounds areas would be under the control of the Golf Club and readily manageable.

Topic	Summary of consultee response	How the Applicant has had regard to responses received	The outcome
		<p>protected species licence would be required from Natural England. Subject to those requirements, the Applicant would develop proposals for the area in close consultation with the Club.</p> <p>It is anticipated that the area would be fenced to dissuade players from entering it and that the management and operation of the area would be within the control of the Golf Club. The area to be managed would be of a similar size and extent to the existing second hole.</p>	
Location of the 2nd hole in relation to the new slip road	<p>Maylands Golf Course - the new layout will mean that the hole is angled toward the carriageway and, as a result, golfers will be exposed to both visual and noise intrusion. The design presented does show mitigation in the form of mounding and planting, however, mounding will only limit a certain amount of the view and will not obscure the embankment created to the north east of the hole. Proposed planting will mitigate the views, but only in the long term.</p>	<p>As regards to visual impact, it is acknowledged that the Scheme will have an impact on the visual amenity of the Course generally by virtue of bringing the highway network closer to the Course. However, the design of the Scheme has sought to mitigate this as far as possible by introducing significant tree planting to act as a visual buffer and by pulling the loop road itself</p>	<p>The Applicant has undertaken an EIA of the Scheme which includes an assessment of the noise and visual impacts on relevant receptors.</p> <p>The predicted daytime noise levels throughout the study area, including across Maylands Golf Course, are shown in noise change contours provided in Figures 6.9 and 6.10, of the ES (application document TR010029/APP/6.2) whilst the</p>

Topic	Summary of consultee response	How the Applicant has had regard to responses received	The outcome
		<p>as far away from the existing Course as possible.</p> <p>As regards to the proposed relocation and reconfiguration of hole 2, this would provide additional distance between the playable golf course and the road allowing for greater visual impact mitigation.</p> <p>It is anticipated that there will be some disruption from construction noise. However, this will be mitigated as far as possible through a CEMP to be implemented by the contractors.</p> <p>As regards to operational noise impacts it is not expected that there will be a significant increase in noise, having regard to the existing position.</p>	<p>landscape and visual effects of the proposals are considered in Chapter 9 of the ES (application document TR010029/APP/6.1).</p> <p>As regards the mitigation measures proposed, an Outline CEMP (application document TR010029/APP/7.2) and an Outline LEMP (Appendix 7.16, application document TR010029/APP/6.3), setting out construction mitigation measures and further details of the planting and visual screening proposed also form part of the DCO application.</p>
Impact on the first hole	<p>Maylands Golf Course - the proposed second tee does not address the impact of the highways works on the first green.</p> <p>Option 1 presented by Weller Designs involved the first hole being re-aligned to the current second green. This re-alignment effectively moved the golfers further away from the proposed highways works. The Highways England</p>	<p>The proposal put forward as part of the targeted consultation was designed to address the future potential for conflict as between the maintenance of the gas pipeline and the playability of the existing hole 2.</p> <p>With regards to the effects of the Scheme on the first hole of the</p>	<p>Aside from the proposals for landscape planting to reduce the visual impacts of the Scheme, the Applicant does not consider it necessary to propose additional mitigation for the first hole of the Course.</p>

Topic	Summary of consultee response	How the Applicant has had regard to responses received	The outcome
	option would not permit this as the revised tees are located on the approach to the green.	Course, the Applicant is satisfied that the Scheme would not give rise to unacceptable impacts on the playability of the first hole. The proposed new highway infrastructure will not be situated within 100 metres of the Course and as such no physical reconfiguration of hole 1 is considered to be necessary. It is recognised that there will be some visual impacts, but screening measures are proposed to mitigate these effects.	
Safety margin from second hole to the public highway	Maylands Golf Course - the design illustrates a reasonable safety distance from the second green to public highway it is still marginal in terms of balls reaching third party land. While the majority will land within the margins illustrated there will still be a percentage that could potentially leave the boundaries of Maylands Golf Club.	It is noted that this is not dissimilar to the current position where balls have the possibility of entering third party land at Glebelands Estate.	The Applicant's proposed redesigned golf hole ensures that conventional industry safety distances are adhered to with at least 100m provided between the highway and the centre of the newly proposed green. The proposal is therefore considered to be appropriate from a safety perspective.
Loss of existing habitat	The design illustrates an area of circa 8000m ² will need to be topsoil stripped to build the hole.	The Club, in its consultation response, has referred to design work undertaken by Weller Design Limited which included	The Applicant has reviewed the Wellers Design option but considers that the Applicant's preferred design seeks to provide

Topic	Summary of consultee response	How the Applicant has had regard to responses received	The outcome
	<p>The design by Weller Designs Limited does currently show a requirement to strip a greater extent of land, there is scope to reduce this. By reducing the extent of the mounding to the right of the new second fairway and minimising the stripping in front of the new third tees it is possible to match the extent of stripping required to match that of the Highways England option.</p>	<p>proposals for reconfiguration of the second hole of the course. However, the Weller Design Limited proposal does not take account of the proposed alignment of the diverted gas pipeline and the need to avoid the route of this gas pipeline. It would also result in a greater loss of ecological features and tree clearance, require greater land take and result in greater loss within the Ingrebourne Valley Site of Metropolitan Importance (SMI).</p> <p>For these reasons, the Applicant has proposed an alternative design for the relocation and reconfiguration of the second hole to those set out by Weller Design Limited. The Applicant has not, at the time of writing, been provided with any refined design solutions as are alluded to within the Club's response but would welcome further opportunity to discuss these with the Club.</p>	<p>a suitable replacement second hole that minimises land take and loss of habitat within the SMI.</p>

Topic	Summary of consultee response	How the Applicant has had regard to responses received	The outcome
Practice Ground	Maylands Golf Course - there has been no discussion with regard to the practice ground to the south east of the site.	<p>The Club has referred to its informal use of an area of land belonging to Glebelands Estate which is currently employed as a practice ground.</p> <p>The Scheme would require the temporary use of this site during construction. A small portion of the area, approximately 10%, would also be required permanently to enable the delivery of a flood attenuation pond. The land would also be utilised for the deposit of surplus construction materials. However, the Applicant does not propose to permanently acquire the majority of this land.</p> <p>Following construction of the Scheme, possession of the land would revert to the landowner and it would remain open to the Club to secure the necessary land interests and consents to utilise this area, should it wish to do so.</p>	There will be a temporary impact on the area of land referred to by the Club and a small portion of it will also be acquired permanently. However, the majority of the site would be returned to the landowner following construction of the Scheme. Any plans the Club has to utilise this site in the future would need to be agreed with the landowner and the local planning authority.
In favour of the changes	LB Havering understand the need for this revision and support the decision to	Noted	Noted

Topic	Summary of consultee response	How the Applicant has had regard to responses received	The outcome
	<p>include land on Maylands Golf Course within the red line boundary for the DCO submission.</p> <p>It is also noted that Highways England are seeking the views of Maylands Golf Course, and Highways England should work closely with Maylands Gold Course as these proposed mitigation works are developed further.</p>		
Great Crested Newts (GCN)	<p>LB Havering - recommend during works near to pond 2 (a breeding pond for GCN), are phased during the construction period and implemented to minimise impacts on the local GCN population of this European Protected Species in strict compliance with the EPS mitigation licence.</p>	Noted	<p>A GCN licence application will be prepared to cover all works which may affect great crested newts and their habitat. This will be submitted to Natural England for review during the examination period. A summary of the mitigation proposals in relation to the Scheme and the golf course are set out in the Chapter 7 of the Environmental Statement and the REAC (application document TR010029/APP/7.3).</p>

10.5 The Applicant's consideration to the Scheme as a result of targeted consultation

- 10.5.1 As part of the targeted consultation, the Applicant presented an indicative design for the proposed relocation and reconfiguration of the second hole of the course. Whilst the Club has raised concerns regarding the proposed layout of the second hole, the Applicant remains of the view that redesign of the hole is capable of being achieved within the area of land identified within the DCO application, and indeed that the design should be constrained to this area, having regard to both environmental constraints, the presence of the diverted gas pipeline and the need to minimise land take. The Applicant therefore has not incorporated any further changes to the red line boundary in this location within the DCO application.
- 10.5.2 As regards the detailed design for the relocation and reconfiguration of second hole, the Applicant remains of the view that its proposed design, as presented to the Club as part of this consultation, is appropriate. However, the Applicant proposes to work closely with the Club to further refine the design to ensure the optimal solution is delivered having regard to all relevant considerations, including the concerns the Club has raised. For this reason, the DCO application has not sought to define the configuration of the replacement second hole but instead has identified the area within which this would be delivered. The Applicant anticipates that, following further liaison with the Club this will either be presented during the examination of the application or be the subject of a requirement within the draft DCO (application document TR010029/APP/3.1).

11 Conclusion

11.1 Summary

- 11.1.1 A multi-phased approach has been adopted to the Applicant's consultation, including both statutory and non-statutory processes.
- 11.1.2 Statutory consultation has served as the primary means of gaining feedback on the Scheme, combined with ongoing dialogue between the Applicant and key stakeholders, and where possible feedback has been taken into consideration in the development of the Scheme, as set out in this report.
- 11.1.3 Feedback received from all consultation undertaken indicates the need for the Scheme, as well as the support of Option 5F in addressing many of the current travelling issues, for example congestion.
- 11.1.4 The main concerns raised from the statutory consultation were in respect of traffic impacts, construction impacts, non-motorised users, the Green Belt designation and possible environmental impacts such as water, biodiversity, geology and soils, air quality.
- 11.1.5 As required by section 49 of the PA 2008, the Applicant has had regard to all the responses which it received in response to the statutory consultation and ongoing engagement.
- 11.1.6 In summary, the main changes that have been made to the Scheme in response to the feedback received as a result of consultation include:
- Development of mitigation proposals, including realignment of the Ingrebourne River and Weald Brook, provision of flood mitigation areas and identification of an area for biodiversity enhancement
 - Diversion of a high-pressure gas pipeline to maintain the integrity of this strategic infrastructure
 - Re-positioning of elements of the Scheme to minimise the impact on landowners, including the relocation of a gantry and reducing the radii of the road.

11.2 Evidence advice and guidance

Table 11.2.1: PA 2008: Guidance on the pre-application process (published by former DCLG)

Para	Requirement	Evidence
17	When circulating consultation documents, developers should be clear about their status, for example ensuring it is clear to the public if a document is purely for purposes of consultation.	All the consultation materials used clearly stated the Scheme name and that the status of the document was for consultation. For example, the statutory consultation brochure (Annex C4) stated on its front cover 'M25 junction 28 improvement scheme – statutory consultation.' At page two of the brochure it stated,

Para	Requirement	Evidence
		'Please read this document and give us your feedback in the response form.'
18	Early involvement of local communities, local authorities and statutory consultees can bring about significant benefits for all parties.	<p>Key stakeholders have been involved throughout the option selection and development of the Scheme as evidenced in this report.</p> <p>Meetings and ongoing engagement have taken place with a range of stakeholders including:</p> <ul style="list-style-type: none"> • Essex CC • LB Havering • Brentwood BC • Transport for London • Environment Agency • Cadent Gas • Affected landowners
19	The pre-application consultation process is crucial to the effectiveness of the major infrastructure consenting regime. A thorough process can give the Secretary of State confidence that issues that will arise during the six months examination period have been identified, considered, and – as far as possible – that the Applicant has sought to reach agreement on those issues.	Extensive engagement and consultation have been undertaken with all consultees and interested parties to give them the opportunity to share their views to influence development of the Scheme. Where possible the Applicant has sought to address issues raised in accordance with the PA 2008 and related guidance on the pre-application process.
20	<p>Experience suggests that, to be of most value, consultation should be:</p> <ul style="list-style-type: none"> • Based on accurate information that gives consultees a clear view of what is proposed including any options; • Shared at an early enough stage so that the proposal can still be influenced, while 	<p>An options consultation was undertaken in November 2016 on the three options that were being considered at the time. This was not a statutory consultation under the PA 2008. Views were sought that helped to inform the selection of the preferred route.</p> <p>Statutory consultation on the preferred option commenced well in advance of the DCO</p>

Para	Requirement	Evidence
	<p>being sufficiently developed to provide some detail on what is being proposed; and</p> <ul style="list-style-type: none"> Engaging and accessible in style, encouraging consultees to react and offer their views. 	<p>submission date to allow time for consultees to influence the development of the Scheme.</p> <p>All consultation materials were reviewed by the Applicant's communications team and consultation team to ensure that content was clear, concise and engaging for anyone with no background knowledge of the Scheme. A variety of communication and engagement methods were used as set out in this report.</p>
25	<p>Consultation should be thorough, effective and proportionate. Some applicants may have their own distinct approaches to consultation, perhaps drawing on their own or relevant sector experience, for example if there are industry protocols that can be adapted. Larger, more complex applications are likely to need to go beyond the design minimum timescales laid down in the Planning Act to ensure enough time for consultees to understand project proposals and formulate a response. Many proposals will require detailed technical input, especially regarding impacts, so sufficient time will need to be allowed for this. Consultation should also be sufficiently flexible to respond to the needs and requirements of consultees, for example where a consultee has indicated that they would prefer to be consulted via email only, this should be accommodated as far as possible.</p>	<p>Consultation was undertaken in accordance with the published SoCC, which was agreed with the relevant local authorities.</p> <p>The statutory consultation ran for eight weeks (56 days) which is in excess of the minimum 28 day requirement. The statutory consultation ran over the Christmas period and so an extension was added to allow consultees more time to respond.</p> <p>Consultation exhibitions were held across a range of days and times in different locations in the vicinity of the Scheme, as well as mobile consultation exhibitions where the Applicant visited local communities, as detailed in Section 7.5.</p> <p>Two 'drop in' sessions were held specifically for PiLs, as close to the Scheme as possible, as detailed in Paragraph 5.8.6.</p>
26	<p>The Planning Act requires certain bodies and groups of people to be consulted at the</p>	<p>The Applicant has followed the PA 2008 and associated guidance in this pre-application</p>

Para	Requirement	Evidence
	pre-application stage but allows for flexibility in the precise form that consultation may take depending on local circumstances and the needs of the project itself. Sections 42 – 44 of the Planning Act and Regulations set out details of who should be consulted, including local authorities, the Marine Management Organisation (where appropriate), other statutory bodies, and persons having an interest in the land to be developed. Section 47 in the Planning Act sets out the applicant's statutory duty to consult local communities. In addition, applicants may also wish to strengthen their case by seeking the views of other people who are not statutory consultees, but who may be significantly affected by the project.	stage to consult with the prescribed bodies, the local community, local authorities, GLA and PiLs as detailed in this report.
27	The Planning Act and Regulations set out the statutory consultees and prescribed people who must be consulted during the pre-application process. Many statutory consultees are responsible for consent regimes where, under section 120 of the Planning Act, decisions on those consents can be included within the decision on a DCO. Where an applicant proposes to include non-planning consents within their DCO, the bodies that would normally be responsible for granting these consents should make every effort to facilitate this. They should only object to the inclusion of such non-planning consents with good reason, and after careful	Engagement with statutory consultees commenced in 2016 – see Chapter 3 of this report. The Consents and Agreements Position Statement sets out the Applicant's approach to additional consents not included within the draft DCO. (application document TR010029/APP/3.3).

Para	Requirement	Evidence
	consideration of reasonable alternatives. It is therefore important that such bodies are consulted at an early stage. In addition, there will be a range of national and other interest groups who could be make an important contribution during consultation. Applicants are therefore encouraged to consult widely on project proposals.	
29	Applicants will often need detailed technical input from expert bodies to assist with identifying and mitigating the social, environmental, design and economic impacts of projects, and other important matters. Technical expert input will often be needed in advance of formal compliance with the pre-application requirements. Early engagement with these bodies can help avoid unnecessary delays and the costs of having to make changes at later stages of the process. It is equally important that statutory consultees respond to a request for technical input in a timely manner. Applicants are therefore advised to discuss and agree a timetable with consultees for the provision of such inputs.	Technical input has actively been sought and secured from bodies such as; EA, Natural England, Historic England and the relevant utility companies. Chapter 4 of this report outlines all of the organisations engaged with.
38	The role of the local authority in such discussions should be to provide expertise about the make-up of its area, including whether people in the area might have particular needs or requirements, whether the authority has identified any groups as difficult to reach and what techniques might be appropriate to overcome	All host local authorities were approached an early stage in development of the SoCC to gain their input and knowledge as to how to best engage with their local communities. Informal and formal discussions were held with; Essex CC, LB Havering and Brentwood BC. These discussions lead to early refinement and agreement on the

Para	Requirement	Evidence
	barriers to communication. The local authority should also provide advice on the appropriateness of the applicant's suggested consultation techniques and methods. The local authority's aim in such discussions should be to ensure that the people affected by the development can take part in a thorough, accessible and effective consultation exercise about the proposed project.	published SoCC, as detailed in Chapter 6 of this report.
41	Where a local authority raises an issue or concern on the SoCC which the applicant feels unable to address, the applicant is advised to explain in their consultation report their course of action to the Secretary of State when they submit their application.	There were no major issues or concerns with the approach to the SoCC as set out in Section 5.2 development of SoCC.
50	It is the applicant's responsibility to demonstrate at submission of the application that due diligence has been undertaken in identifying all land interests and applicants should make every reasonable effort to ensure that the Book of Reference (which records and categories those land interests) is up-to-date at the time of submission.	The Applicant's land referencing and engagement activities has enabled identification of land interests and a programme of early discussions with PiLs to be undertaken. The Applicant has sought to identify all relevant parties and all known land interests have been consulted under Section 42. The Applicant has made every reasonable effort to ensure that the Book of reference is accurate and up to date at the point of submission.
54	In consulting on project proposals, an inclusive approach is needed to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Applicants should use a range of methods and techniques to ensure that they	An inclusive approach to consultation was designed to ensure that different groups had the opportunity to participate in the statutory consultation. To encourage participation in the statutory consultation the

Para	Requirement	Evidence
	access all sections of the community in question. Local authorities will be able to provide advice on what works best in terms of consulting their local communities given their experience of carrying out consultation in their area.	<p>Applicant carried out a range of activities including:</p> <ul style="list-style-type: none"> • A mail out to 56,921 addresses in the vicinity of the Scheme • Social media activity via Twitter • Press Release • Extra adverts (outside of statutory notices) before and after the Christmas period • An email to approximately 5,000 people that signed up to the Scheme website updates
55	<p>Applicants must set out clearly what is being consulted on. They must be careful to make it clear to local communities what is settled and why, and what remains to be decided, so that expectations of local communities are properly managed. Applicants could prepare a short document specifically for local communities, summarising the project proposals and outlining the matters on which the view of the local community is sought. This can describe core elements of the project and explain what the potential benefits and impacts may be. Such documents should be written in clear, accessible, and non-technical language. Applicants should consider making it available in formats appropriate to the needs of people with disabilities if requested. There may be cases where documents may need to be bilingual (for example, Welsh and English in some areas), but it is not the policy of the government to encourage documents to be</p>	<p>The Applicant has been very clear about what was being consulted on at each stage of the process and which elements have been settled.</p> <p>A consultation brochure and response form were published for the options consultation and a further brochure and response form were published for the statutory consultation.</p> <p>These documents summarise the proposals, the potential benefits and impacts and clearly stated what matters the Applicant were seeking people's views on.</p> <p>The consultation brochures met the Applicant's style guide and avoided using technical language and jargon. The brochures and response forms, and the full suite of consultation materials were all available on the website and in display locations and consultation exhibitions.</p> <p>At consultation exhibitions subject matter experts of the project team were readily available to explain the Scheme in detail.</p>

Para	Requirement	Evidence
	translated into non-native languages.	
57	The SoCC should act as a framework for the community consultation generally, for example, setting out where details and dates of any exhibitions will be published. The SoCC should be made available online, at any exhibitions or other exhibitions held by applicants. It should be placed at appropriate local deposit points (e.g. libraries, council offices) and sent to local community groups as appropriate.	The SoCC as agreed provided the consultation framework as detailed in Section 6.2 development of SoCC in this report.
58	Applicants are required to publicise their proposed application under section 48 of the Planning Act and the Regulations and set out the detail of what this publicity must entail. This publicity is an integral part of the public consultation process. Where possible, the first of the two required local newspaper advertisements should coincide approximately with the beginning of the consultation with communities. However, given the detailed information required for the publicity in the Regulations, aligning publicity with consultation may not always be possible, especially where a multi-stage consultation is intended.	The section 48 notices were publicised as set out in Section 7.7 in this report.
68	To realise the benefits of consultation on a project, it must take place at a sufficiently early stage to allow consultees a real opportunity to influence the proposals. At the same time consultees will need sufficient	A non-statutory consultation on options took place in November 2016 to allow for early engagement and to seek opinions on various options for the Scheme. This is covered in Chapter 3 , in this report.

Para	Requirement	Evidence
	information on a project to be able to recognise and understand the impacts.	<p>The statutory consultation commenced in December 2018 and is covered in Chapters 5 and 7 of this report.</p> <p>A supplementary consultation took place between 4 November and 2 December 2019 (as detailed in Chapter 9).</p> <p>All of the above consultations helped inform the development of the Scheme proposal(s).</p>
70	To manage the tension between consulting early, but also having project proposals that are firm enough to enable consultees to comment, applicants are encouraged to consider an iterative, phased consultation consisting of two (or more) stages, especially for large projects with long development periods. For example, applicants might wish to consider undertaking non-statutory early consultation at a stage where options are still being considered. This will be helpful in informing proposals and assisting the applicant in establishing a preferred option on which to undertake statutory consultation.	A non-statutory options consultation was undertaken between 14 November 2016 and 7 January 2017 to consult on the three shortlisted options. In total, the Applicant has conducted four stages of consultation as detailed in this report.
72	The timing and duration of consultation will be likely to vary from project to project, depending on size and complexity, and the range and scale of the impacts. The Planning Act requires a consultation period of a minimum of 28 days from the day after receipt of the consultation documents. It is expected that this may be sufficient for projects which are straightforward and	<p>A summary of all consultation activities and dates is provided in Table 1.6.1 in this report.</p> <p>The statutory consultation ran for eight weeks (56 days) which is in excess of the minimum 28 day requirement. The statutory consultation ran over the Christmas period and so this extension was added to allow consultees a more than adequate time to respond.</p>

Para	Requirement	Evidence
	uncontroversial in nature. But many projects, particularly larger or more controversial ones, may require longer consultation periods than this. Applicants should therefore set consultation deadlines that are realistic and proportionate to the proposed project. It is also important that consultees do not withhold information that might affect a project, and that they respond in good time to applicants. Where responses are not received by the deadline, the applicant is not obliged to take those responses into account.	<p>An extension to the statutory consultation was made for a further 28 days for some specific additional parties.</p> <p>The supplementary consultation ran between 4 November to 2 December 2019 (29 days).</p> <p>The targeted consultation run between 31 January 2020 and 27 February 2020.</p>
73	Applicants are not expected to repeat consultation rounds set out in their SoCC unless the project proposals have changed very substantially. However, where proposals change to such a large degree that what is being taken forward is fundamentally different from what was consulted on, further consultation may well be needed. This may be necessary if, for example, new information arises which renders all previous options unworkable or invalid for some reason. When considering the need for additional consultation, applicants should use the degree of change, the effect on the local community and the level of public interest as guiding factors.	The Applicant has been mindful of the impact of changes to the Scheme and giving stakeholders the opportunity to comment on their impact. For this reason, the Applicant undertook the supplementary consultation between November and December 2019.
77	Consultation should also be fair and reasonable for applicants as well as communities. To ensure that consultations is fair to all parties, applicants should be able to demonstrate that the consultation process is	<p>Consultation was conducted in accordance with section 42 of the PA 2008 and through the approach outlined in the SoCC.</p> <p>The SoCC was reviewed and agreed with the local authorities who have a broader understating</p>

Para	Requirement	Evidence
	proportionate to the impacts of the project in the area that it affects, takes account of the anticipated level of local interest, and takes account of the views of the relevant local authorities.	of any local issues which should be considered.
84	A response to points raised by consultees with technical information is likely to need to focus on the specific impacts for which the body has expertise. The applicant should make a judgement as to whether the consultation report provides sufficient detail on the relevant impacts, or whether a targeted response would be more appropriate. Applicants are also likely to have identified a number of key additional bodies for consultation and may need to continue engagement with these bodies on an individual basis.	Throughout the development of the Scheme, the Applicant has undertaken detailed discussions with relevant technical bodies to address issues, particularly in relation to the watercourses.

Table 11.2.2: Advice in the Planning Inspectorate's Advice Note 14: Compiling the Consultation Report

Advice:	Evidence:
Explanatory text should set the scene and provide an overview and narrative of the whole pre-application stage as it relates to a particular project. It would assist if a quick reference guide in bullet point form, summarising all the consultation activity in chronological order, is included near the start of the report.	This report contains an Executive summary that outlines the consultation undertaken during the development of the Scheme.
The applicant should include a full list of the prescribed consultees as part of the consultation report.	A list of prescribed consultees is provided in Annex C2 .
A short description of how section 43 of the Act has been applied in order to identify the relevant local authorities should be included, this could be supported by a map showing the site and	Local authorities were identified in accordance with the Planning Inspectorate's Advice Note Two: The role of local

Advice:	Evidence:
identifying the boundaries of the relevant local authorities.	authorities in the development consent process. This is set out in Section 5.5 and Table 5.5.2 details the host and neighbouring authorities with a map at Figure 5.5.1 .
Where compulsory acquisition forms part of the draft DCO the consultees who are also included in the book of reference for compulsory acquisition purposes should be highlighted in the consolidated list of prescribed consultees.	This was undertaken as described in Paragraph 5.6.6 .
It would be helpful to provide a summary of the rationale behind the SoCC methodology to assist the Secretary of State's understanding of the community consultation and provide a context for considering how consultation was undertaken.	The rationale behind the SoCC methodology and the detail regarding how it was developed is included in Paragraph 6.2 .
Any consultation not carried out under the provisions of the Act should be clearly indicated and identified separately in the report from the statutory consultation. This does not necessarily mean that informal consultation has less weight than consultation carried out under the Act but identifying statutory and options consultation separately will assist when it comes to determining compliance with design requirements.	A non-statutory options consultation was undertaken at the options stage and this is set out in Chapter 3 of the report. The statutory consultation on the Scheme is described in Chapter 5 and 7 . A supplementary consultation was undertaken, and this is set out in Chapter 9. Although this was a non-statutory consultation, the opportunity was taken to consult with some newly identified statutory consultees on the matters raised at statutory consultation, as well as the matters raised in the non-statutory supplementary consultation. A non-statutory targeted consultation was undertaken, and this is set out in Chapter 10. It is indicated in chapters 3 and 10 that the consultation set

Advice:	Evidence:
	out in that chapter was not carried out under the provisions of the PA 2008.
<p>The summary of responses, if done well, can save a significant amount of explanatory text. We advise that applicants group responses under the three strands of consultation as follows:</p> <ul style="list-style-type: none"> • section 42 prescribed consultees (including section 43 and section 44); • section 47 community consultees; and • section 48 responses to statutory publicity. <p>This list should also make a further distinction within those categories by sorting responses according to whether they contain comments which have led to changes to matters such as siting, route, design, form or scale of the Scheme itself, or to mitigation or compensatory measures proposed, or have led to no change.</p>	<p>The summary of responses clearly distinguishes between the different categories of consultees. Paragraph 5.12 set out the responses from the prescribed consultees whilst Paragraph 7.12 sets out the responses from the section 47 and section 48 consultees.</p>
<p>A summary of responses by appropriate category together with a clear explanation of the reason why responses have led to no change should also be included, including where responses have been received after deadlines set by the applicant.</p>	<p>The tables set out how the Applicant has had regard to the consultation response.</p>

Table 11.2.3: Summary of compliance with PA 2008 statutory requirements

Statutory requirement	Activity undertaken	Date undertaken
Duty to consult prescribed consultees, under section 42(1)(a)	Letters and consultation brochure issued to prescribed consultees (see Chapter 5.4 and Annex C9 and C4 of this report).	30 November 2018 with consultation commencing on 3 December 2018.
Duty to consult each local authority that is within section 43, under section 42(1)(b)	As above (see Chapter 5.4 and Annex C9 of this report).	30 November 2018 with consultation commencing on 3 December 2018
Duty to consult the GLA if the land is in Greater London,	As above (see Chapter 5.4 and Annex C9 of this report).	30 November 2018 with consultation

Statutory requirement	Activity undertaken	Date undertaken
under section 42(1)(C)		commencing on 3 December 2018
Duty to consult each person within one or more of the categories set out in section 44, under section 42(1)(d)	As above (see Chapter 5.4 and Annex C9 of this report).	30 November 2018 and 6 December 2018 and 30 January 2019
Notification of the deadline for the receipt of responses under section 45(1). This deadline must not be earlier than 28 days under section 45(2)	Information stated in the letter and consultation brochure (see Annex C4 and C9).	30 November 2018 with consultation commencing on 3 December 2018 and closing on 28 January 2019
Section 46 Duty to notify Secretary of State of the proposed application on or before commencing consultation under section 42	Letter sent to the Inspectorate (see Paragraph 5.2.1 and Annex C1 of this report).	29 November 2018
Duty to consult each local authority on a SoCC under section 47(2)	Local authorities were consulted during the creation of the SoCC and then formally issued for consultation. (See Chapter 6.2 and Annexes D1 to D7 of this report)	5 October to 4 November 2018
Duty to prepare a SoCC under section 47(1) and to publish it under section 47(6)	Published in the Brentwood Gazette on 5 December 2018 and the Romford Recorder on 7 December 2018 (see Paragraph 6.3.1 and Annex D7).	5 and 6 December 2018
Duty to publicise under section 48	Published in two national newspapers.	The Guardian 3 December 2018 London Gazette 3 December 2018

Statutory requirement	Activity undertaken	Date undertaken
Duty to take account of responses to consultation and publicity under section 49	Response accounted for in the Response Form analysis (see Chapter 7.12).	February 2019 – November 2019

Table 11.2.4: Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended)

Regulation	Evidence
Regulation 3 states that the ‘prescribed consultees’ are those listed in column 1 of the table in Schedule 1 to the regulations and column 2 sets out the circumstances that they must be consulted.	Section 5.4 sets out how the consultees were identified and Annex C2 contains a list of the prescribed consultees.
<p>Regulation 4 sets out the requirements for publicising an application. Regulation 4(2) requires a notice to be published:</p> <ul style="list-style-type: none"> (a) for at least two successive weeks in one or more newspapers circulating in the vicinity in which the proposed development would be situated, (b) once in a national newspaper (c) once in the London Gazette. <p>Regulation 4(3) sets out that a notice must include:</p> <ul style="list-style-type: none"> (a) the name and address of the applicant (b) a statement that the applicant intends to make an application for development consent (c) a statement as to whether the application is EIA development (d) a summary of the main proposals, specifying the location or route of the proposed development (e) a statement that the documents, plans and maps showing the nature and location of the proposed development are available for inspection free of charge at the places (including at least one address in the vicinity of the proposed development) and times set out in the notice (f) the latest date on which those documents, plans and maps will be available for inspection 	Paragraph 7.7 sets out publicity of the requisite notice with Table 7.7.1 contains the dates it appeared in the relevant publications. Annex C7 contains the notice.

Regulation	Evidence
<p>(g) whether a charge will be made for copies of any of the documents, plans or maps and the amount of any charge</p> <p>(h) details of how to respond to the publicity</p> <p>(i) a deadline for receipt of those responses by the applicant, being not less than 28 days following the date when the notice is last published.</p>	

Table 11.2.5: Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Regulation	Evidence
Application for a scoping opinion – regulation 11(1)(b) and (c) requires that the applicant is informed in writing of the names and addresses of the bodies notified of the scoping request and who is likely to be affected or have an interest in the proposed development.	Annex A contains the scoping request to the Inspectorate.
Procedure for establishing whether establishing whether environmental impact assessment is required – regulation 8 sets out that a persons who propose to make an application for an application for an order granting development consent must either ask the Secretary of State for a screening opinion or notify the Secretary of State in writing that the applicant proposes to provide an environmental statement in respect of that development.	Annex A contains the scoping request and paragraph 2 of the letter to the Inspectorate sets out the intention to provide an environmental statement.
Consultation statement requirements – regulation 12(1) requires that the applicant must set out that an application is EIA development and how they are intending to consult on the preliminary environmental information.	Annexes C6 and C7 contain the relevant notices.
Pre-application publicity under section 48 (duty to publicise) – regulation 13 requires that a copy of the section 48 notice should be sent to the consultation bodies.	Table 5.8.1 sets out that this was done.

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