

M25 (Northeast) Residents' Association  
c/o Waterhales Cottage  
Horseman Side  
Brentwood  
CM124 5ST

Michael Doyle  
Brentwood Borough Council  
Ingrave Road  
Brentwood  
CM15 8AY

By email only: [Michael.doyle@brentwood.gov.uk](mailto:Michael.doyle@brentwood.gov.uk)

20 August 2025

Dear Mr Doyle

**24/00874/OUT | Outline planning application (access to be determined, all other matters reserved)  
Dual-site Motorway Service Areas | Land At Priors Golf Course & Hill Farm CM14 5ST**

***Introduction and purpose***

I am writing on behalf of the M25 (Northeast) Residents' Association (the **Association**):

- (i) to invite you to recommend the immediate rejection of Moto's outline planning permission application (the **Application**); and
- (ii) (if you are not willing to do that, or the Planning Committee of Brentwood Borough Council is not willing to reject the Application at this stage), to ask you to take the minimum steps required to turn an unfair Application process, into a fairer one.

***The M25 (Northeast) Residents' Association***

The Association was established in 2024. Its sole purpose is to campaign against the establishment of new motorway service areas (**MSAs**) in the Green Belt, between junctions 24 and 28 of the M25. We have more than 250 members; the overwhelming majority live in the Borough of Brentwood; and new members are joining all the time. There is more information about the Association here: <https://www.m25nomoremsas.org/>

***Rejecting Moto's Application***

Moto cannot deliver the MSAs described in its Application. So, the Application should be rejected.

As you know:

- (i) Moto took pre-application advice from Brentwood Borough Council (**BBC**), between October 2023 and 22 July 2024;
- (ii) By 8 May 2024, Moto had been told, by BBC and the National Highways Authority (**NHA**), that:
  - a. its Application '*would not be supported*' because there would have to be '*very special circumstances*' to justify such an obviously '*inappropriate development*' in the Green Belt, and those circumstances did not exist;<sup>1</sup> and
  - b. (in addition):

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<sup>1</sup> Letter from Brentwood Borough Council to Smith Jenkins Limited, 8 May 2024 (BBC reference: 23/01602/PPA).

- i. the Application would not be viable unless Moto could safely connect the MSAs to the M25;<sup>2</sup> and
  - ii. it would need a planning permission from the London Borough of Havering (**LBH**), because *‘the anti-clockwise MSA entry slip [would] be partially located within the London Borough of Havering;’*<sup>3</sup>
- (iii) The design stage ended, and the Application entered BBC’s decision-making process, when the Application was submitted on 23 July 2024;
- (iv) The Application did not (when made); and still does not (after several adjustments), address the concerns in (i). In fact:
  - a. NHA has lodged a standing objection to Moto’s Application, because – after more than 13 months of trying – it still cannot show that it can safely connect its MSAs to the M25; and
  - b. Moto still not made an application to LBH for the planning permission it needs from that authority;
- (v) The Application claims that Moto and NHA have been discussing M25-northeast quadrant MSAs since February 2022. And yet:
  - a. less than 2 months before the Application was made (7 June 2024), NHA still did not have *‘any details about the access proposals other than that it will be an on-line MSA, requiring the construction of four new slip roads;’*
  - b. 2 months after the Application was submitted (20 September 2024), NHA (A) reminded Moto that it needed a planning permission from LBH; (B) drew Moto’s attention to a material number of gaps, inconsistencies, and flaws, in the Application; and (C) recommended that Moto’s application should not be determined before 16 December 2024, so that Moto could adjust its proposals;
  - c. 5 months after that (26 February 2025), NHA had to extend its deadline to 16 May 2025, because Moto had still not fully and satisfactorily addressed its concerns;
  - d. at the time of writing, Moto has replied to some of NHA’s concerns of June and September 2024, but the February 2025 concerns are still outstanding, *and they still* include that:
    - i. the MSA slip-roads *‘may have a significant impact on the free flow and safety of traffic using the motorway’* because they are so close to junction 28, and for other reasons;
    - ii. the MSAs have *‘the potential to impact on the M25 mainline and junctions ... junction 28 in particular already experiences congestion and mainline queuing at peak times’* (exacerbating a problem that BBC has already said it is especially concerned about);
    - iii. *‘The removal of vehicular access to the rear of the sites ... will mean that staff (not using the minibus service) and service vehicles will be required to use the M25 to access the site’* (in other words, the MSAs will not be in sustainable locations, and should not therefore receive planning permission, in any event);
    - iv. NHAs junction 28 improvements will not solve these problems;
- (vi) In other words, Moto (a well-resourced, experienced, and professionally advised, applicant) has been asking BBC to grant an Application for 13 months, when it knows (and it has known for longer than that) that:

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<sup>2</sup> *Ibid.*

<sup>3</sup> See, for example, National Highways response to Moto’s Environmental Impact Assessment Scoping Request, BBC reference: 24/00551/EIASO.

- a. its Application will ‘*not be supported*’ by BBC’s planners, because it is inconsistent with the Green Belt policies of both BBC *and* the UK Government (see the National Planning Policy Framework (December 2024));<sup>4</sup>
  - b. it needs to make a successful planning application to LBH – and it has not done so;
  - c. it needs at least a non-objection from NHA, and it is *still* a long way from getting that (see (v)(d) above); and
- (vii) As if that was not enough, Moto has also known, since at least 10 March 2025 (when BBC published the Church Commissioners’ letter to Mike Ovenden / BBC of 7 March 2025), that ‘*The Church Commissioners own the Mines and Minerals underneath significant parts of the proposed site[s];*’ they ‘*have no intention to sterilise this resource and allow Moto to create [MSAs] over [their] Mines and Minerals;*’ and ‘*therefore the scheme is undeliverable.*’

Over the last 13 months, Moto has adjusted and supplemented its Application as it tries both (a) to fill the gaps, and resolve the inconsistencies, within it; *and* (b) address NHA’s long-standing concerns. That is wasting BBC’s time and resources. It has also contributed to the development and pursuit of an unfair process (as to which, see below).

It is clear (for example, from (v)(d) above), that (a) if Moto is left to its own devices, this adjustment and supplementation process will continue; and (b) despite Moto’s best efforts, the proposed MSAs will never be viable because they are too close to junction 28 for Moto to be able to overcome NHA’s concerns, however it tries.<sup>5</sup>

In these circumstances, the Application should be withdrawn or rejected now, to bring this saga to an end, before more public resource is wasted on it.

### ***Turning an unfair process into a fairer one***

If you are not yet minded to recommend the Application’s rejection; or the Planning Committee is not currently minded to accept that recommendation, I would ask you to take the minimum steps required to turn an unfair process into a fairer one.

As you know:

- (i) Moto is an experienced, well advised, and well-resourced applicant. Those who will be adversely affected by the proposed MSAs are not;
- (ii) Applications of this kind are unavoidably large, complex, and technical. They cannot therefore be prepared without access to a variety of suitably qualified and experienced experts. They cannot be properly scrutinised without access to experts either, and those who will be most affected by the granting of the Application do not have the access and other advantages that Moto has;
- (iii) Moto has had access to BBC councillors, planners, and staff; and we have not;
- (iv) Moto’s Application was first validated on 29 July 2024; the most recent ‘site notice’ and ‘neighbour consultation expiry’ dates were 18 September and 7 October 2024;
- (v) These are tight deadlines for an Application that is as large, complex, and technical as this one; and they are especially tight when those who will be most affected by Moto’s proposals are lay people, who work;
- (vi) There has therefore been a significant ‘inequality of arms’ between Moto (whose interests will plainly be served by the granting of the Application); and the members of the Association (whose

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<sup>4</sup> The Association has carefully considered, and fundamentally disagrees, with the Smith Jenkins, ‘Planning Statement Addendum – Grey Belt Assessment,’ added to BBC’s website on 16 April 2025; stands by its earlier ‘Green Belt’ arguments, including those added to BBC’s website on 12 March 2025; and will explain its position more fully, in due course.

<sup>5</sup> **Note:** the Application is flawed in several ways. We have drawn your attention to some of the flaws, in this letter. We reserve the right to draw your attention to the other flaws, and to make other arguments and submissions, in due course.

interests have already been adversely affected by the Application,<sup>6</sup> and whose interests will be adversely affected again if the Application is granted, and again, if the MSAs are built);

(vii) In this case:

- a. The version of the Application that was validated and published on BBC's website on 29 July 2024, comprised at least 60 documents and 2,057 pages;
- b. By the time the most recent site notice and neighbour consultation expiry dates had passed, another 2 documents and 211 more pages had been added to the Application;
- c. Since then, another 17 documents and 1,744 more pages have been added, in a piecemeal fashion (i.e. at least 17 batches of extra documents have been filed by Moto, or by its advisors on its behalf);

(viii) This adjustment, supplementation, and piecemeal approach, compounds the unfairness of the current process. It was always going to be challenging (at best) for the Association and its members to properly consider and respond to an Application that comprises 79 documents and 4,012 pages. It is, of course, wholly unrealistic to expect the Association and its members to consider and respond to batches of documents, as Moto and its advisors produce them, sometimes in quick succession. Of course, the unfairness this creates is compounded by the fact that, as consultees respond, Moto makes further adjustments to its proposals, and more scrutiny is required. In other words, the Application has entered the decision-making stage, and Moto is abusing the process, by continuing to shore up its Application, as if it was still in the design-phase;

(ix) It follows that, for these and other reasons, the decision-making process has become so unfair that, if:

- a. (despite the arguments made in this letter), Moto is somehow able to satisfy NHA's concerns; and
- b. (despite its previously expressed concerns and reservations, *and* its policy commitments) BBC eventually decides to grant the Application,

we will be able to challenge BBC's decision on fairness, procedural, and other grounds.<sup>7</sup>

In the circumstances, and if the Application is not to be withdrawn or rejected now, we would ask you to (a) give us at least 3 weeks' notice that the Application has reached its final, settled, form so that we can prepare and submit a single, final, set of objections to the Application as a whole (instead of being expected to respond piecemeal, as the Application is adjusted and supplemented overtime); and (b) give us an opportunity to meet you and your colleagues, before you prepare your recommendations to the Planning Committee, so that we *and they* can be sure that our concerns have been fully understood, both before your recommendations are finalised and before they are made available to the Planning Committee.<sup>8</sup>

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<sup>6</sup> The Application is already making it more difficult for Association members to sell their homes, if that is what they want to do. We anticipate that it is also adversely affecting the value of members' homes; and that each of these things will be exacerbated if (a) the Application is granted; and (b) (again) if the MSAs are built.

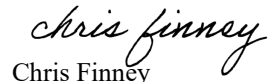
<sup>7</sup> These grounds include, for example, that the urban footprint of the proposed MSAs will be 18 hectares, but it is put at 1.6 hectares in the Application. This is so mis-leading that it makes the Application consultation process and results unreliable. It also means that the Environmental Statement is not an accurate description of the development to be assessed, and is therefore not compliant with the requirements of regulations 18(3)(a) and (c) of the Environmental Impact Assessment Regulations.

<sup>8</sup> The process that has developed since the Application made and validated has been unfair in several ways. We are not suggesting that, if these requests are granted, that will be enough to turn an unfair process into a fair one. We reserve the right to make these and other procedural unfairness arguments in due course.

*Next steps*

I will look forward to receiving your comments by 3 September 2025, please, so that we can update our members and consider our next steps.

Yours sincerely

A handwritten signature in cursive script that reads "chris finney".

Chris Finney

For and on behalf of

The M25 (Northeast) Residents Association

cc: the members of the M25 (Northeast) Residents' Association, via the Association's website