

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

Jonathan Stephenson (Chief Executive) and
Barry Aspinell (Council Leader)
Brentwood Borough Council
Ingrave Road
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CM15 8AY

By email only:

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4 June 2025

Dear Mr Stephenson and Mr Aspinell

**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**

I am writing on behalf of the M25 (Northeast) Residents' Association. The Association has more than 220 members. Like our previous correspondence, this letter is intended to avoid either of you being bombarded with other communications.

As you know:

- (i) Moto has applied for planning permission which, if granted, will allow it to build 2 motorway service areas (**MSAs**) near junction 28 on the M25. At this stage, access is to be determined. Everything else is reserved.
- (ii) Moto and Brentwood Borough Council (**BBC**) began their pre-application discussions before November 2023.
- (iii) By 8 May 2024 (at the latest), BBC had made it clear that, based on the information available at that time, *'the application would not be supported'* because (for example) new MSAs would necessarily be *'inappropriate development – and by definition, harmful to the Green Belt,'* unless they were justified by *'very special circumstances,'* of which, there were none. That aside, BBC explained that:
 - a. National Highways (**NH**) and the London Borough of Havering (**LBH**) both thought that a planning application to LBH would be required because, *'the anti-clockwise MSA entry slip will be partially located within the London Borough of Havering;'*¹ and
 - b. MSA access to and from the M25 would be *'of primary importance'* – not just because access is the only matter to be determined now but because, unless and until Moto can show that it has a settled, safe, and viable, way of connecting its MSAs to the M25, its application cannot be viable.²
- (iv) When Moto submitted its planning application to BBC on 23 July 2024, it repeatedly claimed that it had been talking to NH about MSAs in the northeast quadrant of the M25 since February 2022. And yet:

¹ See, for example, NH's response to the EIA Scoping Request, BBC reference: 24/00551/EIASO.

² Letter from Brentwood Borough Council to Smith Jenkins Limited, 8 May 2024 (BBC reference: 23/01602/PPA)

- a. as late as 7 June 2024, NH had told BBC that, ‘*We do not currently know 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. on 20 September 2024, NH repeated its assertion that Moto would need a planning approval from LBH before its slip roads could be built; drew the attention of BBC and Moto to a material number of gaps, inconsistencies, and flaws, in Moto’s proposed access arrangements; and recommended that Moto’s application should not be determined before 16 December 2024, to give it more time to adjust and complete its proposals;
 - c. this process was repeated on 26 February 2025, and NH’s deadline was put back to 16 May 2025, to give Moto even more time.
- (v) Although Moto replied to NH’s concerns of June and September 2024, there is no publicly available evidence that it has replied to NH’s concerns of February 2025 – concerns which *still* include (for example) that:
- a. a planning approval from LBH is required before the slip roads can be built;
 - b. these slip-roads ‘*may have a significant impact on the free flow and safety of traffic using the motorway;*’
 - c. ‘*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;*’
 - d. these things have, ‘*the potential to impact on the M25 mainline and junctions ... junction 28 in particular already experiences congestion and mainline queuing at peak times;*’
 - e. NH’s junction 28 improvements will not be enough to resolve issue (b), issue (c) *or* issue d.
- (vi) In other words, Moto (an experienced and professionally advised applicant) is still asking BBC to grant its planning application, although it knows that:
- a. its MSA proposals are inconsistent with BBC’s Green Belt Policy; *and* the Green Belt policy sections in the National Planning Policy Framework (December 2024);³
 - b. a planning application is a decision-making stage, not a scheme design process – and yet it is relying on NH, and other consultees, to fix its scheme’s shortcomings (this is why its proposals have changed so many times since they were consulted on in July 2024);
 - c. it will need a planning approval from LBH before it can proceed – although it has *still* not made an application;
 - d. it will need a non-objection from NH (at least) – and *still* does not have this; and
 - e. BBC cannot give Moto an outline planning permission which determines access (all other matters reserved), until Moto can show that it has a settled, safe, and viable, way of connecting its MSAs to the M25 – and it *still* cannot do that, after at least 18 months of trying.

NH has lodged a standing objection to Moto’s application; and made it clear that it would be content for the application to be refused.

Over the last 18 months, BBC, its councillors, and its staff have spent a great deal of time on Moto’s application. BBC has also incurred some significant consultants’ and other external fees.

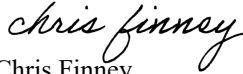
³ The Association has carefully considered, and fundamentally disagrees, with the Smith Jenkins, ‘Planning Statement Addendum – Grey Belt Assessment,’ added to BBC’s website on 16 April 2025; stands by its earlier ‘Green Belt’ arguments, including those added to BBC’s website on 12 March 2025; and will explain its position more fully, in a separate letter.

We would urge our council to draw things to a close, by rejecting Moto's application now, rather than spending any more time and public money on it.

I am copying this letter to the three relevant Ward Councillors listed on BBC's website, and to our members. A copy will also be published on the Association's website.

I will look forward to receiving your comments within a fortnight, please so that we can update our members and consider our next steps.

Yours sincerely

A handwritten signature in black ink that reads "Chris Finney". The script is cursive and fluid.

Chris Finney

For and on behalf of

The M25 (Northeast) Residents Association

cc:

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M25 (Northeast) Residents' Association members