

## **Brentwood Borough Council response to the Lower Thames Crossing Statutory Consultation, December 2018**

### **Principle**

#### **[1. The need for the Lower Thames Crossing]**

The Council supports the need for an additional river crossing. Evidence and experience shows that Dartford is heavily congested, which not only delays journeys but also has a negative impact on the local and national economy.

### **Brentwood Enterprise Park and M25 Junction 29**

#### **[3.2. Sections of the route North of the river in Thurrock, Essex and Havering**

##### **7. Development Boundary**

##### **11. Building Lower Thames Crossing**

##### **13. Other Comments]**

The Council has approved the Brentwood Pre-Submission Local Plan (Regulation 19), which includes provision for employment growth in the Borough to meet local needs. Fundamental to the employment strategy is the delivery of new employment land at Brentwood Enterprise Park, adjacent to M25 junction 29. There are historic development uses on site, including a highway works compound used as part of the M25 widening project. 89% of Brentwood Borough is within the London Metropolitan Green Belt, including this land. Therefore, meeting high housing and employment needs is challenging, which has resulted in the Council developing a strategy to balance development needs with retaining the local “Borough of Villages” character. In terms of employment, the Council has maximised strategic highway locations as a result of rationalising existing employment land in central locations to deliver a wider mix of uses in suitable places. Delivery of new employment land at Brentwood Enterprise Park is critical to the creation of new jobs in the Borough, and this location presents a unique opportunity for economic growth that is consistent with local character and can benefit a wider network through connectivity (London and South Essex).

The current Lower Thames Crossing proposals compromise the existing access arrangements to Brentwood Enterprise Park. This risks the delivery of the largest employment allocation in Brentwood Borough, and one of the two largest proposed in Essex.

The current Lower Thames Crossing proposals also set the need for temporary access through the centre of Brentwood Enterprise Park to service National Grid infrastructure/pylons to the south of the site. This access could be more sensibly located on the western edge of the site, adjacent to the M25, providing the required access during construction of the highways improvements and not constraining delivery of new employment land. An alternative access route has been suggested

to Highways England to ensure both objectives can be met but this has not been proposed.

Discussion has taken place with Highways England highlighting these issues, held by both Brentwood Borough Council and St Modwen, who are promoting Brentwood Enterprise Park. However, the Lower Thames Crossing proposals seem to have little consideration for the issues raised.

The proposals at M25 junction 29 risk undermining a key aim of the Lower Thames Crossing project, which is the stimulation of economic growth. The Council requests that further engagement with Highways England take place to identify junction improvements that can deliver alternative access arrangements to Brentwood Enterprise Park.

The Council object to proposals at M25 junction 29 on the basis that it constrains the existing access arrangements to Brentwood Enterprise Park. Further engagement is requested from Highways England to help resolve this objection, providing alternative options that can ensure the delivery of necessary improvements at M25 junction 29 for the Lower Thames Crossing project, and the delivery of economic growth at Brentwood Enterprise Park.

#### **Supporting Growth Aspirations in South Essex [4.1. Connections North of the Crossing]**

The Council recognises the balance that needs to be struck between competing benefits, such as fewer connections on route to increase journey times, reduce traffic, and maintain safety; and more connections on route that could help to unlock new development potential. Brentwood Borough Council is a partner in the Association of South Essex Local Authorities (ASELA), along with Thurrock, Essex County Council, Basildon, Castle Point, Rochford, and Southend. ASELA has been formed to realise long-term growth ambitions across local authority boundaries and to underpin strategic spatial, infrastructure and economic priorities. ASELA is preparing a Joint Strategic Plan to deliver the homes and jobs needed in South Essex through partnership working, not just at a local level, but also with Government, to bring forward key strategic infrastructure improvements needed to support growth, such as transport.

The proposed route and connections north of the crossing do not maximise opportunities for new growth. New junctions in Thurrock are not proposed. New junctions could enable the delivery of new communities supporting Government objectives to deliver new homes and jobs, supported by the work of ASELA. Given the pressure from the Ministry of Housing and Local Government to deliver new homes and jobs, and the requirement from the Department for Transport for transport infrastructure to support and enable growth, this seems like a missed opportunity.

On this basis, the Council objects to connections proposed north of the crossing and requests further engagement between Highways England and ASELA to enable growth aspirations in South Essex.

## **Strategic Highway Network**

### **[9. Traffic]**

The Council notes highways modelling work that has been published alongside Lower Thames Crossing consultation documents.

The Council support efforts made to understand traffic conditions through highways modelling and the need to improve traffic flows at M25 junction 29, benefitting a wider area and surrounding roads. The Council request further engagement with Highways England to enable modelling work to be consistently reflected in the Brentwood Transport Assessment, and vice-versa.

## **Future Engagement and Resolution of Objections**

### **[13. Other Comments]**

The Council requests further engagement with Highways England to help resolve objections relating to M25 junction 29 and the delivery of Brentwood Enterprise Park.

The Council requests further engagement between Highways England and ASELA to discuss opportunities for the Lower Thames Crossing to enable growth in South Essex.

The Council reiterates a comment made in response to Lower Thames Crossing proposals in 2016, that an additional crossing will only do so much to relieve congestion given the increasing levels of traffic projected in the South East of England driven by economic and housing growth. For this reason a wider infrastructure strategy is required for various transport types and future needs. This includes additional Thames crossings to reduce congestion and improve reliability and resilience. In particular, better collaboration between transport infrastructure improvement projects, such as M25 junction 28 and proposals to widen the A12, should be considered as part of planning for the Lower Thames Crossing.

We thank Highways England for involving the Council in this key public consultation and note the effort that has gone into preparing consultation material and holding public information events. The Council looks forward to continued dialogue on the issues identified in this response.

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