

Brentwood Borough Council response to the Lower Thames Crossing Supplementary Consultation, March 2020

Principle and Wider Benefits [8. Other Comments]

The Council welcomes the opportunity to formally engage with highways England on the Lower Thames Crossing (LTC) project and notes the changes proposed as part of the Supplementary Consultation. The Council notes the ongoing cooperation with Highways England regarding LTC and the Statement of Common Ground being prepared between our two organisations. In this regard, the response to the Supplementary Consultation should be read in conjunction with comments made to previous LTC consultations.

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

However, the Council object to proposals at M25 junction 29 on the basis that it constrains the existing access arrangements to Brentwood Enterprise Park, a fundamental part of the strategy for economic growth in the borough. 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 LTC project, and the delivery of economic growth at Brentwood Enterprise Park.

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.

The Council continues to highlight the importance of delivering improved transport capacity in South Essex. Comments have been made previously regarding 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, Basildon, Castle Point, Rochford, Southend and Essex County Council. ASELA has been formed to realise long-term growth ambitions across local authority boundaries and to underpin strategic spatial, infrastructure and economic priorities. Opportunity South Essex (OSE), partners to ASELA, has expressed concern regarding the design of the new route through Thurrock and the missed opportunity to provide economic benefit to the local area

because of lack of access. The Council agrees with these comments and request that further engagement between ASELA and Highways England takes place regarding economic opportunities that could be enabled by LTC.

The Council has raised comments to previous Highways England consultations (LTC and M25 junction 28) regarding the need to consider the wider strategic highways network and not just individual projects. In addition to the opportunities raised above in South Essex, rather than rely on the existing M25 and specific junctions such as 29 and 28 for traffic using the LTC to access parts of central Essex and beyond, Highways England should consider traffic between the A12 and LTC. Due to increased levels of traffic flows a wider strategy is needed to consider links to and from the A12 independent of the M25.

M25 Junction 29, B186 Warley Street and Brentwood Enterprise Park [1. Changes to the Route; 2. Revised Development Boundary]

The Council has submitted the Brentwood Pre-Submission Local Plan, which includes provision for growth in the Borough to meet local needs. This is also informed by emerging work in the south of the borough regarding sustainable transport integration, which Highways England has been involved. This area of the borough, known as the South Brentwood Growth Corridor, connects to the LTC via M25 junction 29. In addition, Highways England has been involved in the production of the Local Plan Transport Assessment. This evidence base proposes several changes to the highways network, including the B186/A127 junction, and accesses to Brentwood Enterprise Park and Codham Hall Farm from M25 junction 29. It is not clear how the LTC proposals have considered these proposals in light of the Brentwood Local Plan.

The submitted Brentwood Local Plan plans for new employment land at Brentwood Enterprise Park and the allocation of existing employment land at Codham Hall Farm, both adjacent to M25 junction 29. This is in addition to other employment growth planned in the corridor and a new garden village at Dunton Hills. The current LTC proposals compromise the existing access arrangements to these sites or do not take account of the Brentwood Local Plan Transport Assessment. This risks the delivery of the largest employment allocation in Brentwood Borough, and one of the two largest proposed in Essex.

The identified need for junction improvements through the LTC project is as important as the need for safe and effective access to Brentwood Enterprise Park, given it is a large employment site within the Brentwood Local Plan that will deliver needed economic growth. While M25 junction 29 is a key focus in the LTC proposals, a consistent approach setting out the legacy of the LTC and how existing accesses will be safeguarded and maintained should be provided.

The Council has requested further engagement with Highways England to enable transport modelling work to be consistently reflected in the Brentwood Transport Assessment, and vice-versa. The Brentwood Transport Assessment makes efforts to mitigate increased flows at M25 junction 29 as a result of planned growth, including the potential to close access to Codham Hall Farm from the junction slip

road. This mitigation has been accommodated following concerns from highways England about junction capacity and safety. However, the revised LTC proposal now looks to use this access for works. The Council requests that consistency is applied to the consideration of the junction for both the LTC and Brentwood Local Plan, as well as growth planned in other areas. Alternative access to Codham Hall Farm through Brentwood Enterprise Park (and so the need for improved or new access over the A127) is being considered by the Council and so should be considered within LTC proposals. However, regardless of options that the Council is considering regarding the mitigation of growth, Highways England should ensure that accesses are maintained to both the Brentwood Enterprise Park and Codham Hall farm sites (i.e. with or without delivery of LTC).

Alternative access arrangements to Brentwood Enterprise Park from the B186 have been tested in the Brentwood Transport Assessment as a result of the LTC proposals at M25 junction 29. This alternative access can be achieved subject to the reduction in speed limit on the B186, something that is being discussed with Essex County Council (local highway authority). It is noted that a works access for the LTC is now proposed off the B186. The Council supports the reduction of speed limit on this road in order to accommodate a safe and compliant access. Further engagement with Essex County Council is advised on this issue.

The current LTC proposals also set the need for temporary access through the centre of Brentwood Enterprise Park. Clarity is sought on the need for temporary access and permanent acquisition of rights proposed. 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.

Regular discussion has taken place with Highways England highlighting these issues, held by Brentwood Borough Council and the landowner/promoter of Brentwood Enterprise Park and Codham Hall farm. However, the LTC proposals seem to have little consideration for the issues raised.

The proposals at M25 junction 29 risk undermining a key aim of the LTC project, which is the stimulation of economic growth. The Council requests that further engagement with Highways England take place to coordinate proposals for highways proposals.

Environmental mitigation proposed as part of the proposals at M25 junction 29 is not explained to provide more detail about what this will entail. Further engagement is requested regarding this issue.
