

## **Brentwood Borough Council response to the Lower Thames Crossing Community Impacts Consultation, September 2021**

*This response takes account of the announcement made in August 2021 where Highways England changed its name to National Highways. For the purpose of this response and its accompanying committee report, reference is made to 'National Highways'*

### **Q2d. North of the river in Thurrock, Havering and Essex**

#### **Principle**

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

This is a complex project. The Council is grateful for the way that the National Highways LTC project team has made efforts to explain things simply in the consultation material, such as the ward summary documents (in this case, for Warley and South Weald wards, within Brentwood borough).

#### **Wider Benefits**

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 seeks additional clarity detailed in response to questions xxx that would ensure the protection of planned growth delivery, small local roads, and villages.

The Brentwood Local Plan has been undergoing examination by appointed Planning Inspectors since February 2020. Proposed development near to LTC work at M25 junction 29 include delivery of a garden village (Dunton Hills Garden Village) and strategic employment land (Brentwood Enterprise Park), among other things. This has been the subject of comments made in response to previous LTC consultations and moving forward the Council wishes to repeat the opportunity for synergy when delivering growth and highways improvements from the LTC project in and around M25 junction 29. Both Dunton Hills Garden Village and Brentwood Enterprise Park are progressing planning applications where detailed discussion should continue with National Highways (and local highways authority Essex County Council).

## **Unresolved issues / continued engagement**

Several matters that the Council has raised through previous consultation stages have been addressed. In addition to the comments made in response to the Community Impacts Consultation, previous comments made and ongoing discussion between the Council and National Highways include:

- Need for the LTC to support economic growth aims in the borough and wider area;
- Importance of delivering improved transport capacity in South Essex through joint working with the Association of South Essex Local Authorities (ASELA);
- Opportunity for the LTC route north of the Thames in Essex (Thurrock Borough specifically), to provide more connections that could unlock new development potential, and the need to work closer with ASELA on this;
- Resolution of the existing access at M25 junction 29 to Brentwood Enterprise Park (an area of new employment land being proposed through the Brentwood Local Plan, one of the two largest new employment sites in Essex), and Codham Hall Farm (existing employment uses); and
- Questions about use of land proposed for new employment uses at Brentwood Enterprise Park during the construction of LTC (long-term or permanent access through the site, gas pipeline diversion, etc); and
- The need for non-motorised uses to be prioritised beyond simply crossing the A127 (although this is supported), and for these to be integrated with mitigations planned through the delivery of Brentwood Enterprise Park and other local plan growth (the provision of this is even more important considering the environmental mitigation proposed by the creation of a new community woodland at Hole Farm in Warley).

## **New community woodland at Hole Farm, Warley**

The Council supports the creation of this new community woodland in the borough and is grateful to National Highways (in partnership with Forestry England) for providing greater clarity on the environmental mitigation from Lower Thames Crossing – a point of objection to the previous consultation that has been resolved. Provision of the community woodland will be a great asset to local people, providing publicly accessible open space and benefiting health and wellbeing. The Council is keen to support those delivering the new community woodland. The Council is keen to ensure that non-motorised uses (including pedestrians) have improved access through the area, including links outside the new community woodland.

## **Q1 b & d: The project's impacts and mitigation**

### **Transport Assessment**

- It is noted that the project is due to commence from 1 January 2024 and finish by 31 December 2029. While the Council should leave the validity of the LTC transport assessment model to Essex County Council as local highways authority, there is concern about the impact on housing delivery projections within the Brentwood Local Plan period (to 2033). In particular, for planned growth in the South Brentwood Growth Corridor due to main LTC works M07 and M08 on the M25, and M10 to the A127 (which facilitates work to the M25).

- Housing and employment delivery may also be affected by the enabling works D09 to facilitate utility diversions over nine months, which impacts the A127 and may affect the ability to deliver the new slip road from M25 junction 29 to the B186. So careful coordination will be required for these and the main works mentioned above.
- Within Brentwood the construction traffic and employee traffic generated by LTC compound CA16 adjacent to Brentwood Enterprise Park is accounted for. However, it is not clear how trips from the construction of Brentwood Enterprise Park are taken into account or once the park is operational. The Council seeks clarity on the impacts to Brentwood Enterprise Park once the rolling contraflow enabling works at D10 on St Mary's Lane are active.
- The biggest unknown is construction spoil. The LTC Transport Assessment adds 20% to flows to account for spoil traffic but states that it is not yet known where that spoil will be going given this is likely to be site specific and by contract etc. Our concern is that landfill sites around Greater London and the South East will compete for this spoil and truck movements carrying it will be uncontrolled. If left unchecked this could generate trips through places like West Horndon village in the event that the A127 is congested, and/or increase truck movements through the Brentwood urban area and town centre. The Council seeks some form of control measure from National Highways regarding spoil movements.

#### **Framework Construction Travel Plan**

- The Council request that it remain directly informed of the Travel Plan that impacts compound CA16.
- Mention is made of sustainable modes of transport, which a subject the Council has made some progress with the South Brentwood Growth Corridor sustainable transport vision document. This vision aims to link growth with sustainable transport options, such as Demand Responsive Transport. The Council seeks to engage with National Highways about the prospect of including the CA16 contractor into the Demand Responsive Transport model to be launched in the South Brentwood Growth Corridor and potentially beyond.
- The Council requests representation on the proposed Travel Plan Liaison Group along with Essex County Council and other partners.
- The Council queries whether sufficient resource is in place from National Highways to effectively administer and monitor this process.

#### **Code of Construction Practice (CoCP)**

- The Council notes the importance of the CoCP in terms of the requirement for an Environmental Management Plan (EMP2) to be created by the local contractor. This will determine travel behavior, especially for truck delivery routes into the compounds and spoil movements away from them.

#### **Communications and Engagement Plan**

- There are outstanding issues relating to achieving the very best from the project locally and so the Council seeks a structure that allows as direct feedback as possible to National Highways and the local contractor should any issues arise.

## **Waste Management Plan**

- While the plan seeks to minimise the amount of construction waste that needs to leave site to circa 20%, if the contractor achieves this it would still equate to over 2 million cubic meters of spoil. It's likely this would go wherever local contractors get the best deals, so there is a danger that sites which are accessed by shortcuts through the boroughs urban areas and villages, or to avoid congestion on main highways, would be utilised by HGVs. As above, the Council seeks some form of control measure from National Highways regarding spoil movements.

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