

## **Brentwood Borough Council response to the Lower Thames Crossing local refinement Consultation, June 2022**

### **Principle**

1. Brentwood Borough Council (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 local 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.
2. 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.

### **Wider Benefits**

3. 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 1h, 1i, 3d, and 4a that would ensure the protection of planned growth delivery, small local roads, and villages.
4. The Brentwood Local Plan 2016-2033 was adopted in March 2022 following an extensive period of examination in public. Allocations for significant development are identified within the local plan near to LTC work at M25 junction 29, including 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. The delivery of both Dunton Hills Garden Village and Brentwood Enterprise Park is progressing with live planning applications where detailed discussion should continue with National Highways (and the local highway authority Essex County Council).

## Unresolved issues / continued engagement

5. Several matters that the council has raised through previous consultation stages have been addressed. In addition to the comments made in response to this local refinement consultation, previous comments made and ongoing discussion between the council and National Highways include:
  - a) Need for the LTC to support economic growth aims in the borough and wider area.
  - b) Importance of delivering improved transport capacity in South Essex through joint working with the Association of South Essex Local Authorities (ASELA).
  - c) 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.
  - d) 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).
  - e) 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).
  - f) 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).
  - g) Questions around 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 to the A127 and enabling works.
  - h) Clarity on how trips from the construction of Brentwood Enterprise Park are taken into account or once the park is operational and the impacts to Brentwood Enterprise Park once the rolling contraflow enabling works on St Mary's Lane are active.
  - i) The appropriate consideration and control of spoil movements from the site which are currently not clear.
  - j) Request for continued dialogue on the Travel Plan that impacts compound CA16. In addition continued engagement on the prospect of

including the CA16 contractor into the Demand Response Transport model to be launched in the South Brentwood Growth Corridor and potentially beyond.

- k) Queries concerning whether National Highways have sufficient resource in place to effectively administer and monitor the Framework Construction Travel Plan.
- l) Continued request for a structure that allows the Council as direct feedback as possible to National Highways and the local contractor should any issues arise.

**Q1h and Q1i. Proposed changes to the section of the route north of the river: M25 junction 29 and Q2a: Improvements for walkers, cyclists and horse riders: A127/M25 junction 29**

- 6. The proposed changes relevant to Brentwood borough concern the upgrade of walking, cycling and horse riding bridge over the A127, east of M25 junction 29. These concern an update to the planned A127 bridge so it can accommodate horse riders and to include a link to bridleway BR183. This would allow for segregation of horse riders from motor traffic including HGVs which is the situation with the current bridge arrangements.
- 7. There are a number of points the council wish to raise in respect of these proposals, which are set out below:
  - a) The council supports the aim to improve infrastructure and facilities for non-motorised users including horse riders which is important in achieving overall sustainability aims.
  - b) There are concerns that the proposals may be incompatible with those being developed through both the adopted Brentwood Local Plan and the current planning application for Brentwood Enterprise Park. The council request that continued engagement is undertaken between National Highways, Essex County Council, Brentwood Borough Council and the Brentwood Enterprise Park promoters, St Modwen. This is to ensure that the most suitable solution is developed in respect of ensuring non-motorised users can cross the A127 in a safe and convenient manner.
  - c) Linked to this the council would also want to ensure that due consideration has been given to any necessary improvements for the onward travel of non-motorised users travelling through the northern part of M25 junction 29. This is particularly important as the southern arms of the junction will be closed off for non-motorised users as a result of the Lower Thames Crossing proposals. Also this will be the key connection between the new bridges (numbered 25 and 26) identified in Havering and Brentwood. Currently the footways in this location have uncontrolled crossings across the north bound on slip and the footways are not

particularly wide. The council would welcome further discussion on the details of how this matter is proposed to be addressed.

### **Q3d. Nitrogen impact and compensation: Hole Farm, Brentwood**

8. It is understood that since the last consultation, in consultation with Natural England, the project has had to consider the impacts of Nitrogen Deposition on the environment and specific habitats.
9. As a result of this the project now identifies proposed compensation sites for habitat creation amounting to approximately 250ha. Of the four areas identified one includes Hole Farm, Brentwood. This was originally purchased by National Highways in 2021 to deliver benefits for communities and the environment. Hole Farm has been deemed suitable as a compensatory habitat because it is close to Codham Hall Woods and other designated sites. It would also link with the existing woodlands that form the habitat network in this area. The amount of land anticipated to be used for compensatory measures is around 75ha.
10. The Council recognises that a masterplan is being developed for the entire site in partnership with Forestry England and Thames Chase Community partners. The masterplan will include proposals for the facilities associated with a community woodland such as a tree nursery and a visitor centre. It is understood that these elements of the scheme would be consented separately from the Lower Thames Crossing DCO via a planning application submission to Brentwood Borough Council.
11. The Council welcomes the commitment of National Highways to continue engagement with the Council and other key stakeholders in the development of this part of the project. As matters progress we would request clarification on the amount of the overall site that would eventually be accessible to the public given that significant elements of the sites are now required for specific compensatory measures relating to Nitrogen Deposition. We would also repeat our previous comments that there is expectation for non-motorised users to have improved access through the areas, including links outside the new community woodland.

### **Q4a. Changes to the Order Limits, special category land and private recreational facilities**

12. From review of the plans provided at part of the local refinement consultation the Council recognises that there are some specified changes to the order limits for the proposal. These include the addition of Hole Farm on the basis of being required for compensatory measures relating to nitrogen deposition. There are also additional areas relating to the non-motorised users crossing over the A127. There are reductions in the order limits on land to the south east of J29 which overlapped with the Brentwood Enterprise Park allocation.

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