

Affected/Interested Party Ref [20035315]

DEADLINE 1 WRITTEN REPRESENTATIONS on behalf of Bellway Homes Ltd with regards to Land North of South Ockendon:

Further to the Lower Thames Crossing (LTC) Consultations, which our client Bellway Homes Ltd provided extensive representations to, we registered on behalf of Bellway Homes Ltd as an interested party in the LTC DCO application in relation to land at South Ockendon and provided a summary of their objections within the Relevant Representations submitted at that time. A letter outlining Bellway's concerns and objections in more detail was produced and sent to National Highways at the time of registration to give them further opportunity to work with Bellway and provide assurances, where possible, to help alleviate them. Following this we have received responses from National Highways, which are appreciated, and we will continue to liaise with them to try and make progress with regards to Bellway's concerns and objections. At this time Bellway's principle concerns and objections can be summarised within the following points – please read this in conjunction with the Annotated Land Use Plan appended:

1. As previously advised, the LTC has potentially significant impacts upon the delivery of housing on the land to the North of South Ockendon. The land being promoted by Bellway Homes is situated to the West of North Road and to the North of West Road. The Western boundary abuts the railway line to the east of South Ockendon. Through the emerging Local Plan Thurrock Council have identified South Ockendon, including the land over which Bellway Homes has an option, as having potential for large scale strategic growth comprising approximately 10,000 homes. The land over which Bellway has an option could deliver a significant number of these, however due to the LTC severing the option site Bellway may now only be able to deliver approximately 1,000 homes and approximately 20 acres of employment land. Noise generated by the LTC needs to be sufficiently mitigated. National Highways has responded on this point to Bellway, however, this remains a concern. Additional mitigation in the form of acoustic barriers have been discounted by National Highways as being unnecessary in this area, something that we believe still requires further consideration.

We understand that the noise modelling submitted with the DCO is fully calibrated and could be used to identify the changes in noise levels and the predicted absolute

noise levels at levels within the Bellway option land. We would welcome further dialogue to explore this matter to ensure Bellway are satisfied that the noise impacts will not impact development of this land.

To summarise, Bellway Homes Ltd needs to be satisfied that sufficient noise mitigation will be delivered, in order to prevent the LTC from prejudicing Thurrock Council's housing growth aspirations for South Ockendon, particularly in relation to the Bellway Homes option land.

2. The proposed LTC will also sever the existing watercourse drainage that serves the northern parcel within Bellway's option land. This currently drains via a number of ditches and drains in a southerly direction under the proposed LTC. Therefore, to prevent the northern parcel being completely sterilised, suitable alternative surface water and foul drainage must be provided by National Highways to ensure that its existing uses can continue and to allow for its future development. Appropriate legal rights must also be granted over land that is to be transferred to National Highways to facilitate this drainage and to ensure its ongoing maintenance.

National Highways has since confirmed that the intention is for the ditch alongside the LTC to take surface water flows from the "northern parcel" of the site and that further engagement with the landowner is expected to occur. To date, we remain concerned that the discharge rate of the existing land has not been taken into account within the design of the drainage ditch, and that confirmation that the ditch can both take the predicted flows and allow for drainage from the northern parcel is required. We also remain concerned about how foul water from the northern parcel would connect to the existing foul water network – with the route of the LTC severing routes to the south. Should discharge into the ditch not be available then allowance within the design needs to be made for a conduit under the LTC to allow for both surface and foul water flows in the future as there are no alternative surface water discharge points or foul sewer networks north of the proposed LTC route.

3. Bellway understand that the objective of the public right of way route along north Road is required to connect settlements and populations. They however still object to the requirement for the permanent acquisition of land to deliver a footpath connection between the LTC and the northern edge of the existing built-up area of South Ockendon. Bellway welcome National Highways intention to consider a voluntary agreement regarding land ownership to ensure that future development and access is not constrained. We would wish to further such discussions on this matter and reserve our position in relation to our concerns on this matter.
4. Whilst the reduction in the extent of land required for the Development Order is welcomed, it is unclear what the remaining areas identified are intended for, and in the case of the temporary possession, the envisaged duration of their possession. We request further clarity in this regard. Bellway also requests confirmation and details of the diversion of the various pipelines that run to the north of and under the proposed LTC within Bellways option land. This aspect remains, and Bellway's position is unchanged.

5. In the absence of information, it is entirely unclear why the temporary possession of this land, alongside permanent acquisition rights, would be required. This land represents an increase in the extent of land required for the proposed Development Order to the north of the LTC and is entirely without explanation. We note that National Highways had previously advised that the projection southwards from this strip of land would be required to enable an electricity connection to the northern compound. We have previously made submissions on this point, so please refer to the Community Impactions Consultation appended to this response for further detail on this. Bellway also requires confirmation that National Highways proposed multi-utility works, temporary possession and acquisition of rights will not adversely impact on the proposed access onto North Road from the northern parcel (north of the proposed LTC) as it is necessary for Bellway to maintain the ability to create an access point from the North Road across the proposed multi-utility corridor that runs parallel to North Road. It is requested that where land or rights are acquired by National Highways, suitable rights are reserved to facilitate the existing and proposed access arrangements to cross land with permanent rights.
6. We understand that the Passive Provision junction arrangement is not part of the current DCO application process, however, the potential for its delivery is something that needs careful consideration between Thurrock Council and National Highways. The implementation of a junction in the North Road area could have significant impacts upon traffic routing in this area. More pertinently, the land-take associated with a new junction onto the LTC could affect the delivery of housing on the Bellway option land. Whilst we understand National Highways position on this matter, it remains a concern.
7. We understand from National Highways that the intention is to grout fill and abandon the section of the Barking Pipeline, we would welcome an update on the timescales for this process (identified as "summer 2023"). Whilst we understand that the focus of the work is on the high pressure gas main that is to be diverted, we believe that there is apparatus belonging to other statutory undertakers in this area. Multi-use corridors have been identified for these diversions, but we would again request that any diverted pipeline is provided with upgraded encasing so that consultation zones can be minimised to allow for the most efficient use of potential development land. Confirmation on any changes (or reductions) to HSE consultation zones that may affect the development location on adjacent land is necessary to be understood by Bellway.
8. National Highways has confirmed that they do not see access to the northern parcel from North Road as being compromised by the land ownership rights in this area. Further clarification is needed on how this will be guaranteed by NH and we look forward to receiving this very shortly.
9. It is understood that there are not predicted to be any material changes in traffic flow within South Ockendon as a result of the LTC in and around the Bellway option land site. Further clarifications on how any passive provision

junction may affect traffic flows, and what assumptions on Thurrock Local Plan traffic growth has been allowed for within the LTC transport modelling work is requested.

To enable positive dialogue with National Highways to continue we have produced an updated letter providing a detailed summary to Bellway's concerns which will be emailed today to Sarah Collins (Head of Land, Property and Compensation for the Lower Thames Crossing) and Tim Gloster to give National Highways further opportunity to work with Bellway and provide assurances, where possible, to help alleviate them. This is in addition to ongoing correspondence with them on the various points outlined above.

A copy of said letter can be obtained by emailing: [REDACTED]@struttandparker.com

Given the scale of new information that has been submitted with the DCO application that has not previously been shared during the consultation process, Bellway's technical specialists are still reviewing all documentation and plans. We reserve the right to raise other matters during the DCO process.

In the same way that the Applicant is reserving detailed design provisions to the Design and Build phase of the Project, our client considers it reasonable that planning conditions are imposed on the Lower Thames Crossing that requires the detailed design of the Scheme to be tested and reviewed against our clients masterplans for land north of South Ockendon with both projects in mind to establish an agreed detailed design, given that both schemes have the ability to provide huge public benefit. The decision by Government to delay the commencement of LTC by 2 years will allow extra time for the LTC's detailed design process to account for the emerging Local Plan and the development of South Ockendon.

Yours faithfully,

Oliver Lukies
Surveyor
Strutt & Parker
For and on behalf of Bellway Homes Ltd

