

**Chelmsford office**

Strutt & Parker  
Coval Hall  
Rainsford Road  
Chelmsford  
Essex CM1 2QF  
Telephone [REDACTED]



ChelmsfordPlanning@struttandparker.com  
struttandparker.com

For the Attention of National Highways

**Direct dial:** 01245 254609

c/o Sarah Collins (Head of Land, Property and  
Compensation for the Lower Thames Crossing)  
and Tim Gloster (Deputy Land and Property Manager)

**Email:** [REDACTED]@struttandparker.com

Our Ref: DF/HM/DS/CHM198795

**BY EMAIL:** [REDACTED]

18<sup>th</sup> July 2023

Dear Sarah and Tim

**Lower Thames Crossing Development Consent Order (DCO) – Written Representations on behalf of the Chelmsford Diocesan Board of Finance (Consultee Ref. No. 101974) with regards to 1) Land North of South Ockendon and 2) Land at North Ockendon**

Further to the previous Lower Thames Crossing (LTC) Consultations, which our client the Chelmsford Diocesan Board of Finance (CDBF) submitted extensive representations to, we are registered on behalf of the CDBF as an interested party in the current LTC DCO application in relation to the CDBF's interests concerning Land North of South Ockendon and Land at North Ockendon.

This letter sets out the current position of the CDBF specifically with regard to:

- 1) The CDBF's interests, as a landowner, in land (Land Registry Title Number EX834723) to the North of South Ockendon. The land in question is being promoted by Bellway Homes Ltd. and is situated to the west of North Road and to the north of West Road, South Ockendon.
- 2) The CDBF's interests as landowner in agricultural land (Land Registry Title Number EGL419156) to the south of Ockendon Road, North Ockendon.

A summary (not exceeding 10% of the word count) of these representations is being submitted to the National Infrastructure Planning web-site, in accordance with the requirements set out in the Rule 8 letter.

**1) Land North of South Ockendon**

The CDBF confirm that they support in full the written representations that have been submitted on behalf of Bellway Homes Ltd. concerning Land North of South Ockendon, and which are set out in the detailed letter dated 18th July 2023 to yourselves. This letter summarises the key points contained in that letter as they affect the CDBF's interests.



As shown on the Illustrative Masterplan appended to that letter, the land's western boundary abuts the railway line to the east of South Ockendon. Through its emerging Local Plan, Thurrock Council has identified South Ockendon, including the land over which Bellway Homes has an option (see also Bellway Option Plan appended to that letter), as having potential for large scale strategic growth of up to 10,000 homes to meet identified housing needs. This includes the land interests of the CDBF.

As previously advised, the LTC has potential 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. As shown on the Illustrative Masterplan, its western boundary abuts the railway line to the east of South Ockendon. Through the emerging Local Plan, Thurrock Council has identified South Ockendon, including the land over which Bellway Homes has an option as having potential for large scale strategic growth of up to 10,000 homes to meet identified housing needs. The LTC is due to sever part of the potential development site, and therefore there will be significant impacts on the proposed development. The amount of land required around South Ockendon has varied throughout these Consultations, and, whilst it now appears to have reduced when compared to previous iterations, it remains significant.

Despite raising concerns and queries in previous Consultations, we continue to remain unclear what some of the land is specifically required for and what the potential impacts on the delivery of housing and employment land in this area could be. Furthermore, Bellway's intention was and continues to be to develop the entirety of the area within their Option Plan. Therefore, construction of the LTC over this land will lead to a reduction in the developable area, which will result in significant losses. As a result of the current LTC proposals the capacity of the land being promoted by Bellway will reduce to approximately 1,000 dwellings and approximately 20 acres of employment land, as indicated on the Illustrative Masterplan.

There could be a further reduction in the number of homes delivered within Bellway's option land due to the impact of noise generated by the LTC if this is not sufficiently mitigated. The majority of the concerns raised by Bellway Homes Ltd with respect to the previous Local Refinement Consultation and Community Impacts Consultation remain outstanding. Accordingly, we would request that this letter be read alongside the previous concerns raised by both Bellway Homes Ltd and the CDBF.

Following the submission of representations set out in our letter of 22nd February 2023, National Highways have since provided further clarification of matters, with discussions and work ongoing to assess and confirm the impacts of the LTC on the Bellway option land. The following issues were previously raised during the consultation stage pre-application and will need to be satisfied in full in due course.

1. Concerns remain over the effects of the noise associated with the operational stage of the LTC upon the Bellway option land.

This, if unmitigated, will likely limit the extent of residential development in some areas (principally the north of the land) and increase construction costs associated with the need to mitigate the noise levels. Although National Highways has responded on this point to Bellway separately, this issue remains a concern. The CDBF 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 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. We 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. The Public Right of Way route along North Road

The CDBF understand that is required to connect settlements and populations. We however continue to 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. We welcome National Highways' intention to consider a voluntary agreement regarding land ownership to ensure that future development and access is not constrained.

4. Extent of Land Requirements, including Temporary Possession

Whilst the proposed 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 that possession. The CDBF requests further clarity in this regard. In the absence of supporting information, it is entirely unclear why the temporary possession of that 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. The CDBF and Bellway require 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 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.

5. The Passive Provision Junction Arrangement

The CDBF and Bellway 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.

## 6. Barking Pipeline

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 the CDBF and Bellway.

## 7. Access to the ‘Northern Parcel’ from North Road

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 National Highways and we look forward to receiving this very shortly.

## 8. Future Traffic Flows

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. 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.

## Conclusion

As set out above, the CDBF remains unclear at the present time about some aspects of the LTC proposals and would appreciate further details accordingly. Once we do have further clarity around those matters, we may wish to comment further about the suitability of these. At the current time, it appears that some of the land and rights being sought could unnecessarily restrict development in this area to the detriment of the wider ambitions of Thurrock Council, the CDBF and Bellway Homes Ltd. Therefore, the CDBF supports the representations being made by Bellway Homes Ltd. as summarised above, either on the basis that insufficient information has been provided, or that the proposals have not been sufficiently aligned with the housing growth planned for South Ockendon. It is acknowledged however that there have been improvements since the Community Impacts Consultation, particularly in the reduction to the overall extent of the land to be included in the Development Order. Significant concerns remain regarding the noise and drainage implications of the LTC proposals along with the situation regarding retained rights over land required for permanent and temporary acquisition in some locations.

However, given the scale of new information that has been submitted with the DCO application that has not previously been shared during the consultation process, both Bellway and the CDBF are still reviewing all documentation and plans. We reserve the right to raise other matters during the DCO process.

The CDBF confirm that they are willing to further engage with National Highways to discuss the alignment of the Lower Thames Crossing to the north of South Ockendon, as it affects the CDBF’s land interests, to seek to mitigate the impact on growth in that area as far as possible.

In the same way that the Applicant is reserving detailed design provisions to the Design and Build phase of the Project, the CDBF considers it reasonable that planning conditions are imposed on the Lower Thames Crossing that require the detailed design of the Scheme to be tested and reviewed against Bellway's masterplan 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 the 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.

## 2) Land South of Ockendon Road, North Ockendon (North Ockendon Glebe)


The CDBF has previously raised three queries regarding this land during the Community Impacts Consultation and Local Refinement Consultation. These queries are repeated in these Representations, as below, in order that the Examining Authority can take account of the matters being raised and ensure that the appropriate responses and, if necessary, amendments are made.

- 1) Plans still appear to propose closure of the bridge over Ockendon Road for 19 months between June 2025 and March 2027. Can National Highways please confirm how they propose to provide access to North Ockendon Glebe during this time and also for any other times when Ockendon Road is due to be closed as a result of this scheme?
- 2) Previous plans showed a parcel of land that was severed on Land Registry Title Number EGL419156. This is no longer the case and the road will stay on its existing route. According to the latest plans a hedgerow is proposed on the boundary of Ockendon Road with no allocation of keeping the current field access onto the land. This field access is essential to the current tenant of the land and its loss would have a significant impact on the tenant's use of the land and that of any future tenant, subsequently impacting upon the land's value. Can National Highways confirm that the only access to the field from Ockendon Road will not be affected by the works and remain in situ?
- 3) The land allocated as "*temporary occupation with permanent acquisition of rights*" appears to be for the diversion of utilities. Please may National Highways confirm what utility will be diverted, when it is likely to occur and whether the diversion includes any undergrounding?

Conclusion

The CDBF trust that the Examining Authority will seek to address the above concerns during the course of the Examination.

Yours sincerely



**Mrs Hayley Morley BA (Hons) BPI MRTPI**  
**Associate Director**