



Brentwood Borough Council Written Representations

Lower Thames Crossing
Application by National Highways

PINS Interested Party Number: LTC-IPS002
PINS project reference: TR010032

July 2023

1. Introduction

1.1 This document comprises Brentwood Borough Council's (BBC) Written Representations to the Lower Thames Crossing Development Consent Order (DCO). The Council has separately prepared a Local Impact Report which is submitted along with this document. BBC has also worked with National Highways in preparing a Statement of Common Ground which they will be submitting. These documents should be considered in conjunction with each other.

1.2 The following are identified as main issues / key areas of concern.

- Impact on the delivery of Strategic Employment Allocation E11 Brentwood Enterprise Park
- Growth assumptions in the Lower Thames Area Model (LTAM)
- Construction Traffic Impacts
- Monitoring of project when operational

2. Impact on the delivery of Strategic Employment Allocation E11 Brentwood Enterprise Park

2.1 The Brentwood Local Plan 2016-2033 was adopted in March 2022 and within this it contains allocations which are identified to meet the Borough's future housing and employment needs. One of those allocations is the Strategic Employment Allocation E11 Brentwood Enterprise Park (BEP). This is identified to deliver around 25.85ha of land for employment development which is a significant proportion of the overall needs in the Borough. The key concern relates to the potential impact of the DCO proposals on the ability to implement the development of E11 Brentwood Enterprise Park.

2.2 BEP is located on land to the south of the A127 between junction 29 of the M25 and the B186 Warley Street which are parts of the Lower Thames Crossing DCO Order Limits. A planning application was submitted for BEP (ref: 22/00402/FUL) in March 2022.

2.3 The planning application (ref: 22/00402/FUL) proposes the primary access into the site from junction 29 of the M25 involving the upgrade of the existing Codham Hall Farm access road and then the construction of a new road access bridge over the A127 into the site in the south. This is illustrated in the proposed masterplan. Work Number 9Z for the DCO proposes a Walking, Cycling, Horserider (WCH) bridge over the A127 in the same location.

2.4 It is understood that in the scenario where BEP is permitted and developed in advance of the Lower Thames Crossing proposals there would be no conflict. This is because the BEP proposals would deliver a solution for WCH provision over the A127 in a different configuration to what is being proposed by National Highways. However, in the scenario where the Lower Thames Crossing is developed in advance of BEP there are serious concerns that the WCH bridge that is part of the DCO application would prevent the delivery of the road access bridge that is required to gain suitable access to a strategic employment allocation identified in the adopted Brentwood Local Plan.

2.5 Secondly, there are also potential conflicts with regards to the proposed access for the proposed construction compound CA16 off the B186 Warley Street. This is near the access that is proposed for BEP in this location. It is understood that if the BEP proposals are delivered in advance of the LTC scheme there would be no conflict as the construction compound could utilise the BEP access. However, if the LTC construction compound is delivered in advance of BEP then this would be in a location further south. Therefore, if the BEP scheme come forward at a later date this could compromise the ability to deliver an access that meets road safety design standards due to two access points being in close proximity of each other. Again, as per the issue highlighted above this could prevent the delivery of this important strategic employment allocation which is not considered acceptable.

2.6 Based on the above BBC maintain an objection to the DCO proposals as we do not have confidence its key strategic employment allocation can be delivered if the Lower Thames Crossing is constructed in advance of Brentwood Enterprise Park. BBC would need to be satisfied that the proposals can be implemented in the locations indicated without any conflicts. If this cannot be demonstrated then an alternative location for the Walking, Cycling, Horserider bridge to the north and the access location on the B186 to the south would need to be proposed.

3. Growth Assumptions in Lower Thames Area Model (LTAM)

3.1 The Council have emphasised their concerns that the Lower Thames Area Model (LTAM) does not take account of planned growth which is identified in the adopted Brentwood Local Plan. This includes, but not limited to, a strategic employment allocation, E11 Brentwood Enterprise Park and Strategic Residential-led allocation, R01 Dunton Hills Garden Village. It is understood that Dunton Hills Garden Village has been accounted for in the model but Brentwood Enterprise Park has not. This could result in further negative effects on the road network that have not been accounted for in the LTAM.

4. Construction Traffic Impacts

- 4.1 The Council has concerns regarding the potential impact of construction traffic in and around Brentwood. This is particularly important given the constrained nature of the highway network in the main Brentwood urban area but due to its position between the A12, M25 and A127 offers an alternative for construction traffic to travel through if there are problems on the Strategic Road Network. The sensitive routes include the A128 through Wilson's Corner continuing north towards Ongar in the north and along the A1023 to the north east and junction 12 of the A12. The other route would be from J28 of the M25 down Brook Street, then Mascalls Lane and onto the B186 down towards the A127.
- 4.2 It is understood that National Highways have committed to establishing two monitoring locations during the construction period. These would be on the northern side of the A127/A128 roundabout and the junction of the A1023 and Mascalls Lane. These are to be reviewed by Essex County Council as Highway Authority and further locations may be required to ensure the appropriate monitoring of construction traffic in the area. If following this further monitoring locations are required Brentwood Borough Council would want the opportunity to review these.
- 4.3 To alleviate the impact of construction traffic the Council has sought that in regard to the Construction Compound CA16 that workers are strongly encouraged to use public transport as set out in the Framework Construction Travel Plan.

5. Monitoring of project when operational

- 5.1 One of the other key concerns that Brentwood Borough Council has is in regard to the potential wider network impacts of the scheme once in operation and the ability for the impact of the scheme to be monitored and managed appropriately. If not addressed properly additional unmonitored traffic generated by LTC would potentially create severe strain on the strategic road network in the Borough, and consequently stifle future development. Currently the Council is concerned that an appropriate monitoring regime is not proposed for when the scheme is operational, which would identify impacts that were either unforeseen or not accounted for in the methodology of the LTAM (as detailed above). We require a monitoring regime, the extent and time period of which should be agreed with Essex Highways and ourselves.