



Brentwood Borough Council Local Impact Report

Lower Thames Crossing
Application by National Highways

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

July 2023

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1 Introduction

- 1.1 This report comprises the Local Impact Report (LIR) for Brentwood Borough Council (BBC) for the proposed development by National Highways of the Lower Thames Crossing (LTC); a Nationally Significant Infrastructure Project (NSIP).
- 1.2 As set out in the Planning Act 2008, the purpose of the LIR is to provide written details of the likely impact the proposed development (the 'Project') would have on any part of BBC's authority area. The local knowledge and evidence held by Local Authorities is valuable to the NSIP process and can provide further insight to that provided by the applicant in the Development Consent Order (DCO) application.
- 1.3 This LIR follows the guidance in Advice Note one (Local Impact Reports April 2012 Version 2). In particular, the guidance advises "Local authorities should cover any topics they consider relevant to the impact of the proposed development on their area". The report therefore does not seek to comment on matters that do not affect the borough, even if these are planning matters. The LIR is therefore proportionate to the scale of development proposed within the borough. For example, most of the proposed development lies within Thurrock to the south and beyond into Kent and this LIR will only cover matters relevant to Brentwood Borough Council.
- 1.4 This document has been written on the basis that Brentwood Borough Council and National Highways have worked together and prepared a Statement of Common Ground (SoCG) which is fully expected to be agreed and submitted by Deadline 1 on 18 July 2023. The Council has also prepared written representations. Consequently, this LIR, SoCG and written representations should be read in conjunction with one another.
- 1.5 It is noted that the Examining Authority and the Secretary of State must have specific regard to the BBC LIR (as well as others received) when making their recommendation and decision, respectively.

2 Site description and surroundings/location

- 2.1 The Project involves providing a connection between the A2 and M2 in Kent and the M25 south of junction 29, crossing under the River Thames through a tunnel.
- 2.2 The area of the DCO Order Limits that are within Brentwood Borough Council's boundaries include the M25 in the south up through junction 29 to a section adjoining junction 28. Other areas include the section of the A127 east of junction 29 up to the B186 Warley Street junction and includes land between the B186 and the M25 opposite the Upminster Trading Park. To the

north of junction 29 a large area of land known as Hole Farm, which is predominantly farmland and woodland is also included within the order limits.

- 2.3 This part of the borough is dominated by the M25, A127 and A12 and their respective junctions at J29 and J28. The A127 is the main east – west route from London towards Basildon, Rayleigh and Southend-on-Sea. The junction is one of two in the borough serving the M25, the other connects the A12 from Romford to Ingatestone, Chelmsford, Colchester and beyond.
- 2.4 The nearest settlements are Little Warley which is approximately 1.9km to the east of the M25, junction 29 along the A127. West Horndon is around 3.9km in the same direction. Great Warley is at its closest point 1km from the M25 and 2.2km from junction 29.

3 Details of the proposal

- 3.1 The Project involves providing a connection between the A2 and M2 in Kent and the M25 south of junction 29, crossing under the River Thames through a tunnel.
- 3.2 The description of the development is taken directly from the Applicant’s submitted DCO application form and document 1.3 Introduction to the Application dated October 2022.

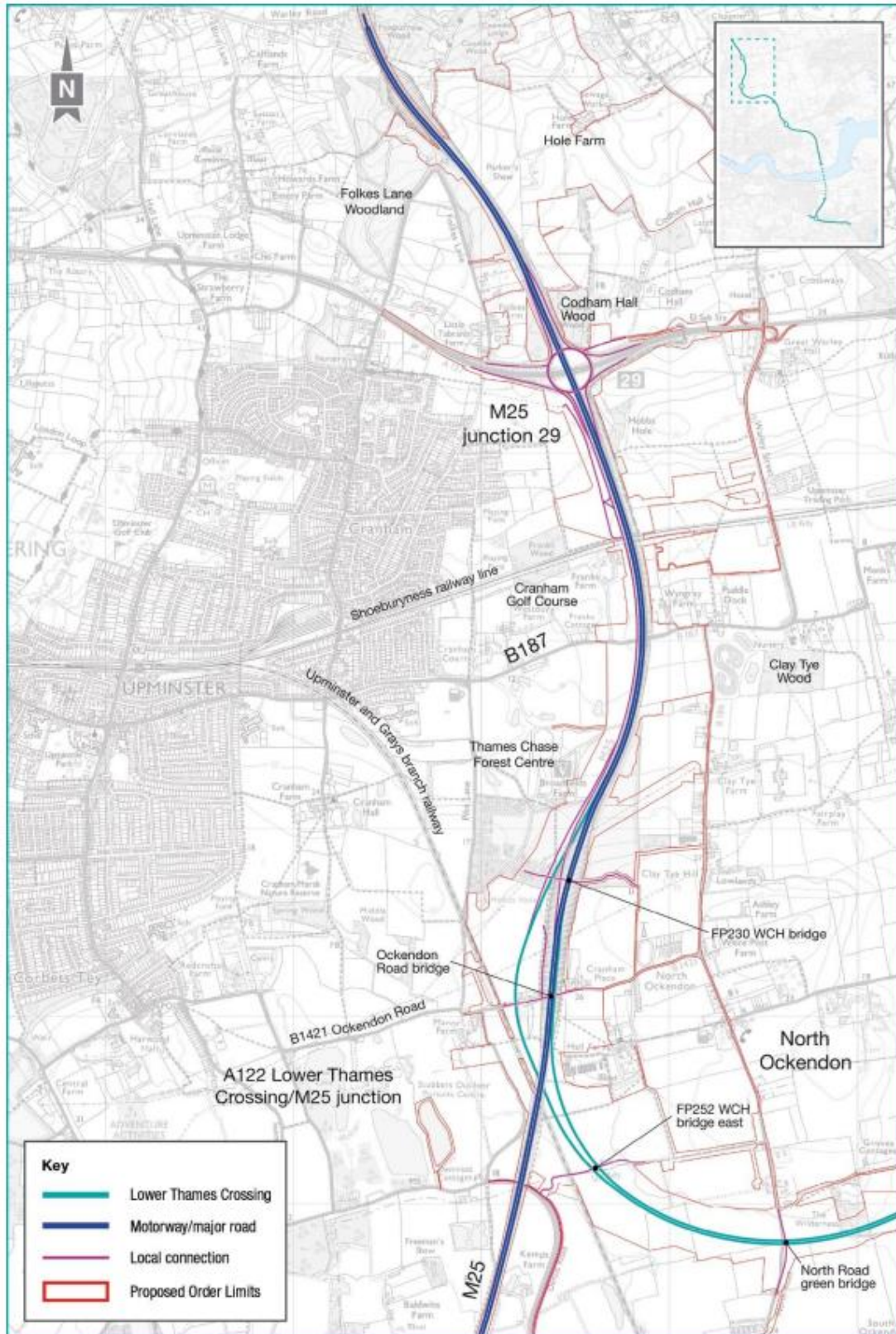
‘The A122 would be approximately 23km long, 4.25km of which would be in tunnel. On the south side of the River Thames, the Project route would link the tunnel to the A2 and M2. On the north side, it would link to the A13, M25 junction 29 and the M25 south of junction 29. The tunnel portals would be located to the east of the village of Chalk on the south of the River Thames and to the west of East Tilbury on the north side.

Junctions are proposed at the following locations:

- *New junction with the A2 to the south-east of Gravesend*
- *Modified junction with the A13/A1089 in Thurrock*
- *New junction with the M25 between junctions 29 and 30’*

- 3.3 A detailed description of the complete scheme is set out at Chapter 2 of the Environmental Statement (‘The Proposed Scheme’).
- 3.4 The proposed development is principally located within the administrative areas of Thurrock Council and Gravesham Borough Council, and to a lesser extent within Brentwood Borough Council, London Borough of Havering, Medway Council and Maidstone Borough Council. The DCO Order limit also adjoins Dartford Borough Council.

3.5 The project has been broken down geographically into 9 sections. Section 9, A122 Lower Thames Crossing/M25 junction is the most relevant to Brentwood Borough Council’s administrative area. An operational Section 9 schematic is set out below:



3.6 The key works in Section 9 relevant to BBC would comprise the following:

- a) Improvement works and widening would be undertaken along the M25 from the Thames Chase Forest Centre up to and including junction 29.
- b) Modification works would also be carried out on the M25 between its junction with the Project and to the north of junction 29.
- c) The M25 would be reduced to three lanes locally between the diverge of the connection to the junction 29 parallel link road and the merge from the A122 northbound.
- d) North of the connection from the A122, the M25 northbound would revert to its existing four lanes with hard shoulder as far as the disconnected junction 29 northbound off-slip.
- e) In the southbound direction, the M25 would be widened from four lanes with a hard shoulder to five lanes with a hard shoulder between the M25 junction 29 southbound on-slip and A122 southbound off-slip.
- f) Through M25 junction 29, the existing M25 would be widened from three lanes each way with hard shoulder to four lanes each way with hard shoulder in both directions. This would involve the widening of the existing viaduct structure over the existing roundabout and A127.
- g) North of M25 junction 29, the connections of the north-facing slip roads would be modified because of the widening of the M25 through the junction. The northbound on-slip would be modified from a lane gain arrangement to an extended auxiliary lane extending approximately 2,340m north. In the southbound direction, a two-lane auxiliary lane parallel diverge would be provided in place of the existing lane drop. These auxiliary lanes would be approximately 580m long.
- h) The M25 southbound would remain on the current alignment with an additional lane between M25 junction 29 and the A122 Lower Thames Crossing/M25 junction. The M25 northbound would also remain on the current alignment, with an additional lane north of the A122 Lower Thames Crossing/M25 junction.
- i) The A127 eastbound and westbound would remain on their current alignment to Southend-on-Sea and London respectively. The current links from the A127 eastbound and westbound to the M25 via junction 29 would also remain.

- 3.7 Key design features in Section 9 relevant to BBC would comprise the following (see Appendix 3 of this LIR for plans showing the location of the proposed works):
- a) **Work Number 9D** - Construction of a new two-lane link road from the M25 northbound carriageway to the M25 junction 29 link road, approximately 3,510m in length. A new overbridge (Structure Ref. BRN0000085), approximately 17m in length and 2m AGL, would be constructed to carry the improved M25 northbound to M25 junction 29 link road over the West Mardyke. A new overbridge (Structure Ref. BRN0000086), approximately 18m in length and 6m AGL, would also be constructed to carry the improved M25 northbound to M25 junction 29 link road over the B187 St Marys Lane. A further new overbridge (Structure Ref. BRN0000087), approximately 37m in length and up to 8.5m AGL, would be constructed to carry the improved M25 northbound to M25 junction 29 link road over the Shoeburyness railway line. Also, to include a new private means of access between the new PRow (Work No. 9P) and the existing M25 junction 29 roundabout would also be constructed.
 - b) **Work Number 9E** – Construction of an improved section of the M25, including the improvement of the existing M25 northbound for approximately 9,610m in length, and the improvement of the existing M25 southbound for approximately 9,010m in length. Also includes modification of the Mardyke West Tributary culvert (Structure Ref. BRE0013569) to carry the improved M25 southbound over the Mardyke West, modification of the underbridge (Structure Ref. BRE0013568) to carry the improved M25 southbound over B187 St Marys Lane, modification of the bridge (Structure Ref. BRE0013562) to carry the improved M25 southbound over Shoeburyness railway line, and modification of Codham Hall viaduct (Structure Ref. BRE0013567) to carry the improved M25 over the M25 junction 29 roundabout and the A127 road.
 - c) **Work Number 9F** – Construction of an improved link road (improved section of the existing A127), approximately 690m in length, between the A127 westbound carriageway and the improved southbound carriageway of the M25 link road.
 - d) **Work Number 9G** - Improvements to the existing M25 junction 29 roundabout. Full signalisation would be provided in place of the current partial signalisation, and segregated left-turn lanes would be provided from the A127 westbound offslip to M25 southbound on-slip and from the northbound parallel link road to the A127 westbound on-slip. A new PRow would be constructed in the verge of the improved M25 junction

29 roundabout.

- e) **Work Number 9H** - Improvements to the existing two-lane link road between the A127 eastbound and the M25 junction 29 roundabout for approximately 335m in length.
- f) **Work Number 9I** - Improvements to the existing two-lane link road between the M25 junction 29 roundabout and the eastbound link road to the A127, for approximately 325m in length. The existing private means of access between the improved M25 junction 29 roundabout and Codham Hall Lane would also be improved.
- g) **Work Number 9J** - Improvements to a section of the existing A127 two-lane dual carriageway, approximately 1,850m in length.
- h) **Work Number 9K** - Improvements to the existing two-lane link road between the M25 junction 29 roundabout and the M25 northbound link for approximately 1,295m in length.
- i) **Work Number 9L** - Improvements to the existing two-lane link road between the M25 southbound link and the M25 junction 29 roundabout for approximately 1,295m in length.
- j) **Work Number 9P** - Construction of a new PRow under the A122, between the existing footpath FP176 and Warley Street. A new private means of access would also be constructed between the new drainage attenuation pond (Work number 9U) and the existing B186.
- k) **Work Number 9U** - Construction of a gravity highway drainage network incorporating an existing attenuation pond with a new gravity outfall (Pond Ref. POS14-003). The pond is located adjacent to the southbound carriageway of the M25, immediately to north of the Shoeburyness railway line. The pond would be enlarged and reconfigured as a vegetated drainage system with a lined sediment forebay. The pond would outfall to local watercourse via the new gravity outfall. A private means of access would be constructed for the pond.
- l) **Work Number 9V** - Construction of a gravity highway drainage network incorporating an existing attenuation pond with a new gravity outfall (Pond Ref. POS14-005). The pond is located adjacent to the southbound carriageway of the M25, immediately to the north of M25 junction 29. The pond would be enlarged and reconfigured as a vegetated drainage system with a lined sediment forebay. The pond would outfall to local watercourse via the new gravity outfall. A private means of access would be constructed for the pond.

- m) **Work Number 9Z - Construction of a new PRow over the improved A127, east of the existing M25 junction 29; together with the construction of a new WCH bridge, referred to as the A127 WCH bridge east (Structure Ref. BRN0000089) to carry the new PRow at this location. The new combined pedestrian, cyclist and equestrian use bridge would be approximately 55m in length, with an additional approximately 370m of ramps.**

3.8 **Warley Street compound CA16** - There is one construction compound proposed within the Brentwood Borough Council area. The Warley Street compound would be located south-east of M25 junction 29, west of the B186 Warley Street. It would be around 2.4ha in size, with space for parking, offices and welfare, as well as storage and equipment. It would be used as a supporting compound for the widening of the M25, mostly around M25 junction 29. Access would be via a temporary haul road from Warley Street. Construction vehicles would need to use Warley Street between the A127 junction and the entrance of the compound (approximately 300m north of the bridge over the Shoeburyness railway line) throughout construction. Vehicles turning into and out of Warley Street from the compound would be managed using temporary traffic signals.

3.9 **ULH01 Beredens Lane & Work Number G10** - There is one Utilities Logistics Hub (ULH) proposed within the Brentwood Borough Council area. This is ULH01, Beredens Lane and covers an area of approximately 13,200m² and involves the diversion of a gas pipeline controlled by Cadent (**Work Number G10**). Access would be off Beredens Lane and the M25. It is anticipated works could take 13 months.

3.10 The following diversion of other utilities networks are relevant to BBC:

- a) **Work Number MU87** - Trenchless crossing of the M25 to the north of the Shoeburyness railway line. Two replacement poles and polemounted transformers would be required to the west of the existing ones. These works would require extended working hours.
- b) **Work Number MU88** - Trenchless installation of utilities through M25 junction 29 connecting to the east and west of the A127. These works would require extended working hours.
- c) **Work Number MU89** - Trenchless installation of utilities through M25 junction 29. These works would require extended working hours.
- d) **Work Number MU92** - Trenchless crossing of the M25 to the north of M25 junction 29. One new pole-mounted transformer would be

required on the existing overhead pole network to the west of the works. These works would require extended working hours.

3.11 The following temporary utilities works are relevant to BBC:

- a) **MUT32** – Temporary supplies would be provided to compound area CA 16. These would include, power, water, foul water and communications connections.

3.12 The following ecological mitigation and compensation measures proposed as part of the project are relevant to BBC:

- b) **Work Number E50** - Provision for a site for ancient woodland planting compensation, including the construction of at least one new ecological pond. This is located north-east of M25 junction 29 and Codham Hall Wood and is part of the proposals for Hole Farm. This area of compensation is located near Project Section 9 and has been identified to offset the loss of ancient woodland. It is anticipated that the woodland planting as part of the Hole Farm proposals will start in winter 2022/2023 and will have begun to become established prior to the commencement of construction of the Project.
- c) **Work Number E52** - Creation of compensatory habitat to compensate for the effects of nitrogen deposition, located east of the M25 at Hole Farm. This area of nitrogen deposition compensation planting (Site Reference: Hole Farm East) is located near Project Section 9, approximately 750m north of M25 junction 29 and comprises approximately 75.2ha of habitat creation, primarily of woodland. It is anticipated that the habitat creation as part of the Hole Farm proposals would start in winter 2022/2023 and will have started to become established before the start of the Project's construction.
- d) **Work Number OSC12** – In addition to the above part of the Hole Farm site is also proposed as replacement land in exchange for the permanent acquisition of land and rights over it at Folkes Lane Woodland (an area that forms part of the wider Thames Chase Community Forest network of woodlands), located to the north of M25 junction 29 on the western side of the M25. The replacement open space land would be provided on the eastern side of the M25, within a new area of woodland planting at Hole Farm. This area will be linked to the current area by the existing bridge over the M25. The landscaping would complement the existing site and allow the spaces to link together.

4 Relevant planning history and any issues arising

- 4.1 There is no relevant planning history relating to the M25 or A127 specifically. However, on the land within or adjacent to the DCO Order Limits within Brentwood Borough the following applications are relevant as set out in Table 1 below. Corresponding location plans are set out within Appendix 2 of this LIR.

Table 1

	Application Reference	Site Location	Application Description	Status
1.	17/00549/EIASO	Land South of A127 East Of M25 Junction 29, Codham Hall (Brentwood Enterprise Park)	EIA Scoping opinion for a mixed-use commercial and supporting amenity development in Brentwood, known as Brentwood Enterprise Park.	Scoping Opinion Issued: 5 April 2017
2.	12/00331/EIASO	Land Adjacent to Codham Hall	Scoping Opinion on Land adjacent to Codham Hall in respect of a duck farm and agricultural based anaerobic digestion plant.	Scoping Opinion Issued: 8 May 2012
3.	19/00502/FUL	Codham Hall Farm	Construct 2 new agricultural buildings for use as workshop and sprayhouse with associated hardstanding and access.	Application permitted: 7 June 2019
4.	ESS/07/13/BRW (Application determined by Essex County Council as Waste Planning Authority)	Codham Hall Farm, Codham Hall Lane, Great Warley	The use of the site as a material storage, recycling and distribution facility (second submission with revised access)	Application permitted: 25 June 2014
5.	ESS/07/13/BRW/SO (Application determined by Essex County Council as Waste Planning Authority)	Codham Hall Farm, Codham Hall Lane, Great Warley	Screening Opinion request - The use of the site as a material storage, recycling and distribution facility (second submission with revised access)	Screening Opinion Issued: EIA not required 11 March 2013
6.	ESS/40/12/BRW/7/1 (Application determined by Essex County Council as Waste Planning Authority)	Codham Hall Farm, Codham Hall Lane, Great Warley	Retrospective application for the use of the site as a material storage, recycling and distribution facility	Granted on appeal: 13 November 2013

- 4.2 Aside from the issues arising with regards to Brentwood Enterprise Park which are detailed further below no other issues are arising from the applications identified above.

5 Relevant development plan policies, supplementary planning guidance or documents, development briefs or approved master-plans

National Policy

- 5.1 The overarching National Policy Statement (NPS) for Transport is known as the National Policy Statement for National Networks, published in 2014. The statement sets out national policy for the delivery of nationally significant highways infrastructure and include assessment principles for judging impacts of national network proposals. It is a material consideration when considering development proposals
- 5.2 The Government is reviewing and updating the NPS for National Networks, however, at present no update has been announced.
- 5.3 The Environment Act 2021 contains legislation to protect and enhance the UK's Environment for future generations and contains a series of principles to guide future policy making to protect the environment. It contains legally binding environmental targets that will be enforced by law through a new independent Office for Environmental Protection (OEP).
- 5.4 The National Planning Policy Framework (NPPF, chapter 9, promoting sustainable transport) is supportive of large-scale transport facilities, although the environmental impacts of traffic and transport infrastructure should be identified, assessed, and considered.

Local Planning Policy

- 5.5 The Brentwood Local Plan was adopted in March 2022 and covers the period of 2016-2033, this sets out the key principles for development within the Borough. There are several local planning policies that are relevant to the consideration of the proposal.
- Strategic Policy MG02: Green Belt
 - Policy MG05: Developer Contributions
 - Policy BE08: Strategic Transport Infrastructure
 - Policy BE12: Mitigating the transport impacts of development
 - Policy BE16: Conservation and Enhancement of Historic Environment
 - Strategic Policy NE01: Protecting and Enhancing the Natural Environment
 - Strategic Policy PC01: Safeguarding Employment Land
 - Policy NE03: Trees, Woodlands, Hedgerows
 - Policy NE04: Thames Chase Community Forest
 - Strategic Policy NE08: Air Quality
 - Strategic Policy NE09: Flood Risk

- Policy NE11: Floodlighting and Illumination
- Policy E11: Brentwood Enterprise Park
- Policy E10: Codham Hall Farm

5.6 Other relevant adopted local planning policies and guidance include:

- Essex County Council and Southend-on-Sea Waste Local Plan, 2017
- Essex County Council Minerals Local Plan, July 2014
- Developers' Guide to Infrastructure Contributions (Revised Edition 2020)
- The Sustainable Drainage Systems Design Guide for Essex (2020)

6 Relevant development proposals under consideration or granted permission but not commenced or completed

6.1 Table 2 below sets out the relevant proposals which are pending a decision or granted permission but not commenced or completed within or adjacent to the DCO Order Limits. Location plans are set out within Appendix 2 of this LIR:

Table 2

	Application Reference	Site Location	Application Description	Status
1.	22/00402/FUL	Land South Of A127 East Of M25 Junction 29, Codham Hall (Brentwood Enterprise Park)	Regulation 25 Submission: Brentwood Borough Council gives notice that further information has been submitted in support of the hybrid planning application with reference 22/00402/FUL, such further information seeking to remove the outline element of the application relating to the M25 to B186 link road (Phase 2) and making alteration to the application site boundary (to remove the outline element and land adjacent to Jax Folly). The following is the revised description of development for the application. Full planning application seeking detailed planning permission for demolition of existing buildings and structures; ground works to enable creation of development plots; highways works including construction of new A127 overbridge, access to B186, site roads and construction of M25 J29 to B186 link road (phase 1), erection of buildings for Class B8 (Storage and Distribution) and/or Class B2 (General Industrial) use within ancillary office space (within Class E); landscaping, infrastructure and enabling works including diversion of public rights of way. The further information relates to the Environmental Statement, including a Statement of Conformity Letter considering the implications for the changes to the red line boundary of the proposed	Pending consideration

			development for the following topics: Socio-economics, Waste and Resources, Traffic and Transport, Air Quality, Noise and Vibration, Ground Conditions, Water Resources and Flood Risk, Ecology, Climate Change and Greenhouse Gas Emissions, Landscape and Visual Impact Assessments and Built Heritage.	
2.	22/00587/FUL	Land opposite Upminster Trading Park	Regulation 25 submission - Further information under Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Application seeking full planning permission for engineering works on land situated to the south of Brentwood Enterprise Park, west of the B186 (Warley Street), north of the railway line and east of the M25 Motorway. Works to comprise the stripping and storage of topsoil, the movement, spreading and compacting of earthworks material from the adjacent Brentwood Enterprise Park development, and the respreading and levelling of the stored topsoil. The further information relates to the Environmental Statement and Environmental Statement Addendum, including the Non-Technical Summary, Ecology, Built Heritage, Effect Interactions and Conclusions chapters (including amended and additional ecology information and ground level tree assessment).	Pending consideration

- 6.2 The two planning applications set out in Table 2 above are in relation to the Strategic Employment Allocation E11 Brentwood Enterprise Park (BEP) as allocated within the adopted Brentwood Local Plan 2016-2033. The key concern relates to the potential impact of the DCO proposals on the ability to implement the development of E11 Brentwood Enterprise Park.
- 6.3 Firstly, 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 set out in Appendix 2, B, ii of this LIR. Work Number 9Z (Appendix 4, E) for the DCO propose for a Walking, Cycling, Horserider (WCH) bridge over the A127 in the same location.
- 6.4 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.

- 6.5 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 in close proximity to 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.
- 6.6 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.

7 Local area characteristics such as landscape qualities and nature conservation sites

- 7.1 As per the Mid-Essex Landscape Character Assessment 2006 the proposals lie within two Character Areas:
- **F13 Great Warley Wooded Farmland:** Situated to the southwest of Brentwood, this character area encompasses an area of strongly undulating wooded farmland/wooded hills. The area extends from the southwestern edge of Brentwood urban area in the north, to the A127 road corridor in the south. Character is dominated by the extensive patches of woodland, scattered amongst a small-scale (predominantly arable) field pattern. Mature hedgerows, generally in good condition and containing several mature deciduous trees, delineate fields. Pockets of improved meadows, streams and ponds speckle the area and contribute to an overall mature landscape structure. Settlement pattern consists of several dispersed historic farmsteads and the linear hamlet of Great Warley. Narrow, quiet sinuous rural lanes runs across and along the slopes. Despite a sense of enclosure and tranquillity within woodland clearings, tranquillity within the area is disturbed in several locations by background

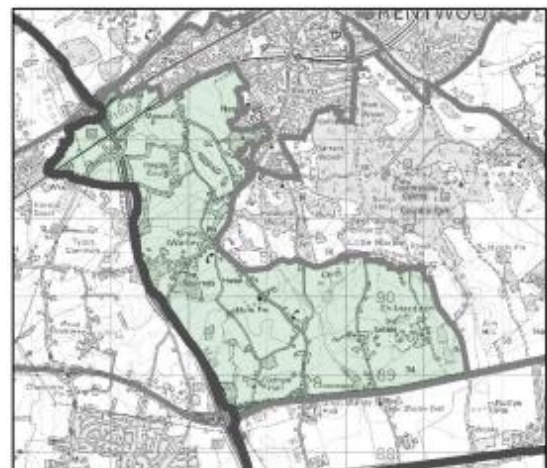
noise associated within the M25 and A127 road corridors, which delineate the western and southern boundaries of the area. Strong, recognisable sense of place is provided by open views across the M25 road corridor over the Thames Chase to London and North Kent.

F13 GREAT WARLEY WOODED FARMLAND



Key Characteristics

- Strongly undulating wooded farmland/wooded hills.
- Extensive patches of woodland.
- Small-scale field pattern with mature treed field boundaries.
- Small-scale settlement pattern comprising small historic farmsteads and hamlets.
- Narrow, quiet sinuous rural lanes.
- Noise and movement associated with the M25 and A127 road corridors.
- Strong sense of place and orientation provided by views across Thames Chase to the west towards London and North Kent.



- **G1 Horndon Fenland:** This predominantly flat arable farmland is situated to the south of A127 and most of the Fenchurch Street to Southend railway line, and encompasses West Horndon settlement. Fields are generally large, with low hedgerows at field boundaries. These hedges often contain single mature deciduous trees, and although gappy in places, are usually trimmed. Sense of tranquillity within the area is disturbed by constant background traffic noise associated with the A127 and also the corridor to the south. To the north and east, a sense of general enclosure is provided by views to low wooded hills. Open views to pylons (which are dominant within several views) and Tilbury power station give a hint of the proximity of this area to a landscape, which is more greatly influenced by human activity around Thurrock1 and the Thames Gateway to the south. Other

than residential and small industrial areas at West Horndon, settlement pattern within the area consists of occasional single farmsteads dotted within the landscape.

G1 HORNDON FENLAND



Key Characteristics

- Large arable and pasture fields.
- Predominantly flat topography.
- Mature hedgerow field boundaries (sometimes gappy), which contain several single mature trees.
- Relatively sparse settlement pattern.
- Views to surrounding wooded hills to the north.
- Long distance views to pylons and Tilbury power station to the south.



7.2 Designated nature conservation sites are set out within the adopted Brentwood Local Plan Policies Map. An interactive version of this map can be viewed on the Council’s website:

<https://maps.brentwood.gov.uk/mapstore/#/context/BBC0>

7.3 The following sites are in close proximity to the DCO Order Limits:

- **Hobbs Hole** - Local Wildlife Site (Bre66) and Ancient Woodland
- **Codham Hall Wood** –Local Wildlife Site (Bre59) and Ancient Woodland
- **Parker’s Shaw** – Local Wildlife Site (Bre54)
- **Combe Wood** – Local Wildlife Site (Bre50) and Ancient Woodland
- **Jackson’s Wood/Tyler’s Shaw** – Local Wildlife Site (Bre46) and Ancient Woodland

7.4 The Local Wildlife Site Review 2012 which informed the designated sites identified within the adopted Local Plan Policies Map sets out the following descriptions for the above sites:

- **Hobbs Hole (Bre66):** Comprises woodland and scrub habitat. The southern part of the site has tall Ash coppice and standards in the high canopy. Much of the remainder is dense Blackthorn scrub with a ground flora dominated by Common Nettle and Red Campion. To the north-east side of the small stream channel that runs through the wood is a high canopy with Ash and a mixed shrub layer with Hawthorn and Elder. In contrast to the species-poor flora of the southern area, the ground flora includes ancient woodland indicators including Wood Anemone, Bluebell and Moschatel. The majority of this woodland is of recent origin. However, the species indicative of ancient woodland suggest that a remnant of far older woodland does survive within this site.

- **Codham Hall Wood (Bre54):** Is dominated by densely shading Hornbeam coppice and occasional Pedunculate Oak standards. Sweet Chestnut is found as a locally dominant tree species, whilst Sycamore and Silver Birch are also present. Elder is part of a very sparse shrub layer. Bluebell and Wood Anemone are abundant throughout the ground flora, which also has other ancient woodland indicator species, including Yellow Archangel, Wood Millet, Wood-sedge and Pendulous Sedge. To the north, two smaller blocks of woodland are found in close proximity to one another, with the larger westerly block being connected to Codham Hall Wood by woodland and hedgerow alongside a small stream. Both of the northern woodland sections have a similar structure with Hornbeam coppice and Pedunculate Oak standards forming the high canopy. This woodland structure continues for some distance alongside the stream channel to the south. Bluebell is abundant in both of these smaller woods and several other ancient woodland indicators are found, including Wild Service-tree, Wood Melick, Wood Millet, Wood Meadow-grass and Wood Anemone. Whilst Codham Hall Wood clearly exhibits the structure and flora characteristic of ancient woodland and is included in the Ancient Woodland Inventory for Essex, the other smaller woodlands also exhibit similar characteristics suggesting that these may also be ancient. The thick hedgerow alongside the stream provides valuable connective habitat.

- **Parker's Shaw (Bre54):** Much of the central part of Parker's Shaw has been replanted with Sweet Chestnut standards. Whilst Bramble forms some dense ground cover, Bluebell and Yellow Archangel are also found in the ground flora. Towards the east side of the Site the character of the wood changes. Young Hornbeam coppice, Hawthorn and Pedunculate Oak standards form a lower canopy with much scrub. The ground flora here comprises Bramble and Ivy. The western and southern margins of the woodland have a contrasting structure to the other areas of the site. These

areas have Hornbeam coppice with ground flora species including Yellow Archangel, Dog's Mercury and the scrambling herb Black Bryony. The status of this wood is uncertain, with possibly some part being derived from ancient woodland. As such, the HC1 criterion may apply in part, but the Site fits more certainly into the definition of the BAP Priority Habitat listed above and the associated criterion. The eastern section of young woodland and scrub is clearly very recent, but provides additional contiguous habitat for wildlife.

- **Combe Wood (Bre50):** The western part of this site is characterised by Silver Birch (*Betula pendula*), scattered Pedunculate Oak, Sycamore and some Sweet Chestnut. Rhododendron forms dense areas of the shrub layer beneath the canopy. Bluebell is abundant in the ground flora of this part of the wood. The eastern part of the Site presents contrasting habitat structure, with very tall Ash and Pedunculate Oak dominating. Sycamore and Rowan are found at sub canopy/shrub level. Other species of the shrub layer throughout the site include Rhododendron, Hawthorn and Elder. Several species indicative of ancient woodlands are found throughout this site, including Wood Anemone, Yellow Archangel, Yellow Pimpernel, Dog's Mercury and Moschatel. Much of this woodland is included within the Essex Ancient Woodland Inventory. The woodland's diverse habitat structure supports important ancient woodland species. More recent areas of woodland form a natural and contiguous habitat extension.
- **Jackson's Wood/Tyler's Shaw (Bre46):** Either side of the watercourse in Jackson's Wood Hornbeam coppice dominates along with scattered Ash and Pedunculate Oak standards. The shrub canopy within the woodland is sparse but includes Hawthorn and Elder, whilst Spindle is confined to the margin of the wood. Patches of Bramble are found beneath the densely shading canopy. Species of interest in the ground flora include Bluebell and Wood Anemone. Tyler's Shaw differs in having a less uniform structure and composition. Whilst Hornbeam, Pedunculate Oak and Ash still dominate the canopy, Sycamore and Scots Pine are also present. The shrub layer in Tyler's Shaw is sparse, but Bluebell is also abundant in the ground flora in this part of the site particularly beneath areas dominated by Hornbeam. Several other ancient woodland indicator species are recorded from this woodland site, including Yellow Archangel, Wood Melick, Primrose and Three-nerved Sandwort. This woodland clearly exhibits the structure and flora characteristic of ancient woodland. It was one of the Sites transferred to Brentwood Borough from the London Borough of Havering during a 1994 boundary review.

8 Local transport patterns and issues

- 8.1 Essex County Council and National Highways are the Statutory Highway Authorities for the area therefore Brentwood Borough Council will rely on these organisations to provide assessments of all relevant planning applications in the Borough. The County Council are also a host authority for the Lower Thames Crossing. ECC will provide their assessment on highway matters in their own LIR and Brentwood Borough Council will primarily therefore defer to ECC on this matter.
- 8.2 The following Development Plan Policies are relevant in respect of the consideration of highways:
- Policy BE08: Strategic Transport Infrastructure
 - Policy BE12: Mitigating the transport impacts of development
- 8.3 One of the 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 below). We require a monitoring regime, the extent and time period of which should be agreed with Essex Highways and ourselves. are identified and actioned accordingly.
- 8.4 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 in this location that have not been accounted for in the LTAM.
- 8.5 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.

- 8.6 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.
- 8.7 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.

9 Designated sites

- 9.1 The following Development Plan Policies are relevant in respect of the consideration of designated sites:
- Strategic Policy NE01: Protecting and Enhancing the Natural Environment
 - Policy NE03: Trees, Woodlands, Hedgerows
 - Policy NE04: Thames Chase Community Forest
- 9.2 The designated nature conservation sites within the Brentwood Borough area within close proximity to the DCO Order Limits are set out in section 7 above. Whilst the DCO proposals only result in very localised loss of ancient woodland at Codham Hall Wood, there are potential impacts upon them in terms of degradation in air quality, particularly through the impact of nitrogen deposition.
- 9.3 DCO Document 6.3 Environmental Statement, Appendix 5.6 Project Air Quality Plan, identifies that of the sites within Brentwood Borough Hobbs Hole Ancient Woodland and Local Wildlife Site and Codham Hall Wood Ancient Woodland and Local Wildlife Site would have significant effect from the project without mitigation.
- 9.4 Mitigation measures have been considered for these sites and others affected across the route but the conclusions of this being that it is not feasible to do so. Therefore, instead compensation areas have been proposed on a strategic basis. One of the compensation areas for Nitrogen Deposition is located at Hole Farm East which would be 75.2ha in size and is within Brentwood Borough.

9.5 Overall whilst there are negative impacts on those Local Wildlife Sites and areas of Ancient Woodland it is acknowledged that the impact on these designated sites in terms of air quality would allow for some positive benefits to be realised.

9.6 It is understood that National Highways have established a Stakeholder Landscape and Ecology Working Group which Brentwood Borough Council will continue to engage with. The purpose of this group is to allow continued discussion on the development and design of landscape and ecology mitigation and compensation during and beyond any DCO consent. This is welcomed and considered appropriate to ensure any unforeseen impacts are dealt with appropriately.

10 Socio-economic and community matters

10.1 The following Development Plan Policies are relevant in respect of the consideration of Socio-economic effects:

- Strategic Policy PC01: Safeguarding Employment Land
- Policy E11: Brentwood Enterprise Park
- Policy E10: Codham Hall Farm

10.2 As reflected in the Council's responses to the consultations during the progression of the project and set out in the Statement of Common Ground with National Highways there is recognition of the need for the Lower Thames Crossing and the positive economic benefits this could enable both locally and nationally.

10.3 However, as detailed above in sections 5 and 6, there are a number of employment allocations located within or in close proximity to the DCO Order Limits. The impact on the delivery of the strategic employment allocation E11 Brentwood Enterprise Park (BEP) is a key concern. BEP is identified as a Strategic Employment Allocation in the adopted Brentwood Local Plan and allows for the delivery of the large proportion of the identified employment needs in the Borough. If this was to be impacted upon as detailed above and as a result could not be delivered this would create an overall negative impact from a socio-economic perspective.

11 Landscape and Visual impact effects

11.1 The following Development Plan Policies are relevant in respect of the consideration of landscape and visual impact effects:

- Strategic Policy MG02: Green Belt
- Policy NE02: Green and Blue Infrastructure

- Policy NE03: Trees, Woodlands and Hedgerows
- Policy NE04: Thames Chase Community Forest

- 11.2 The scheme has been subject to a Landscape and Visual Impact Assessment as detailed in Chapter 7 of the Environmental Statement. In broad terms the assessments undertaken are considered to be appropriate.
- 11.3 The main area identified within the assessment that is relevant to Brentwood is that which is named 'Brentwood Wooded Hills LLCA'. The conclusion of the assessment is that the impact of construction would result in an 'Adverse change in landscape character due to limited loss of woodland along the M25, very localised loss of ancient woodland at Codham Hall Wood, and the perception of construction activity within the context of the M25 corridor, resulting in a further reduction in relative tranquillity'. The effect of construction is stated as neutral and not significant.
- 11.4 The assessment of impacts arising from the scheme during operation state that there would be an 'Increase in the amount of woodland within the LLCA and reduction in the prominence of the M25 corridor. The effect would go from neutral to slight beneficial with it being considered not significant.
- 11.5 It is understood that National Highways have established a Stakeholder Landscape and Ecology Working Group which Brentwood Borough Council will continue to engage with. The purpose of this group is to allow continued discussion on the development and design of landscape and ecology mitigation and compensation during and beyond any DCO consent. This is welcomed and considered appropriate to ensure any unforeseen impacts are dealt with appropriately.

12 Noise and air quality

- 12.1 The following Development Plan Policies are relevant in respect of the consideration of noise and air quality:
- Strategic Policy NE08: Air Quality
- 12.2 DCO Document 6.1 Environmental Statement, Chapter 5 Air Quality presents an assessment of the likely significant effects of the Lower Thames Crossing proposals on local air quality. The assessment considers local air quality impacts on sensitive receptors at human exposure locations and on designated habitats for ecology during construction.
- 12.3 Overall, the conclusions of this assessment are that the significance of the impact of construction traffic, construction dust and operational traffic movements on human receptors would be not significant. The impact on designated habitats would also be not significant except for the impact of

nitrogen deposition as a result of the operational traffic of the scheme when implemented.

- 12.4 DCO Document 6.1 Environmental Statement, Chapter 12 Noise and Vibration presents an assessment of the likely significant effects of the LTC proposals on noise and vibration during construction and operation. Overall this concludes that there would no significant impacts on receptors within the Brentwood Borough area as a result of construction or operational noise.

Appendix 1: Relevant Development Plan Policies (extracts from [Brentwood Local Plan 2016-2033](#))

Pages 38-43 – Green Belt

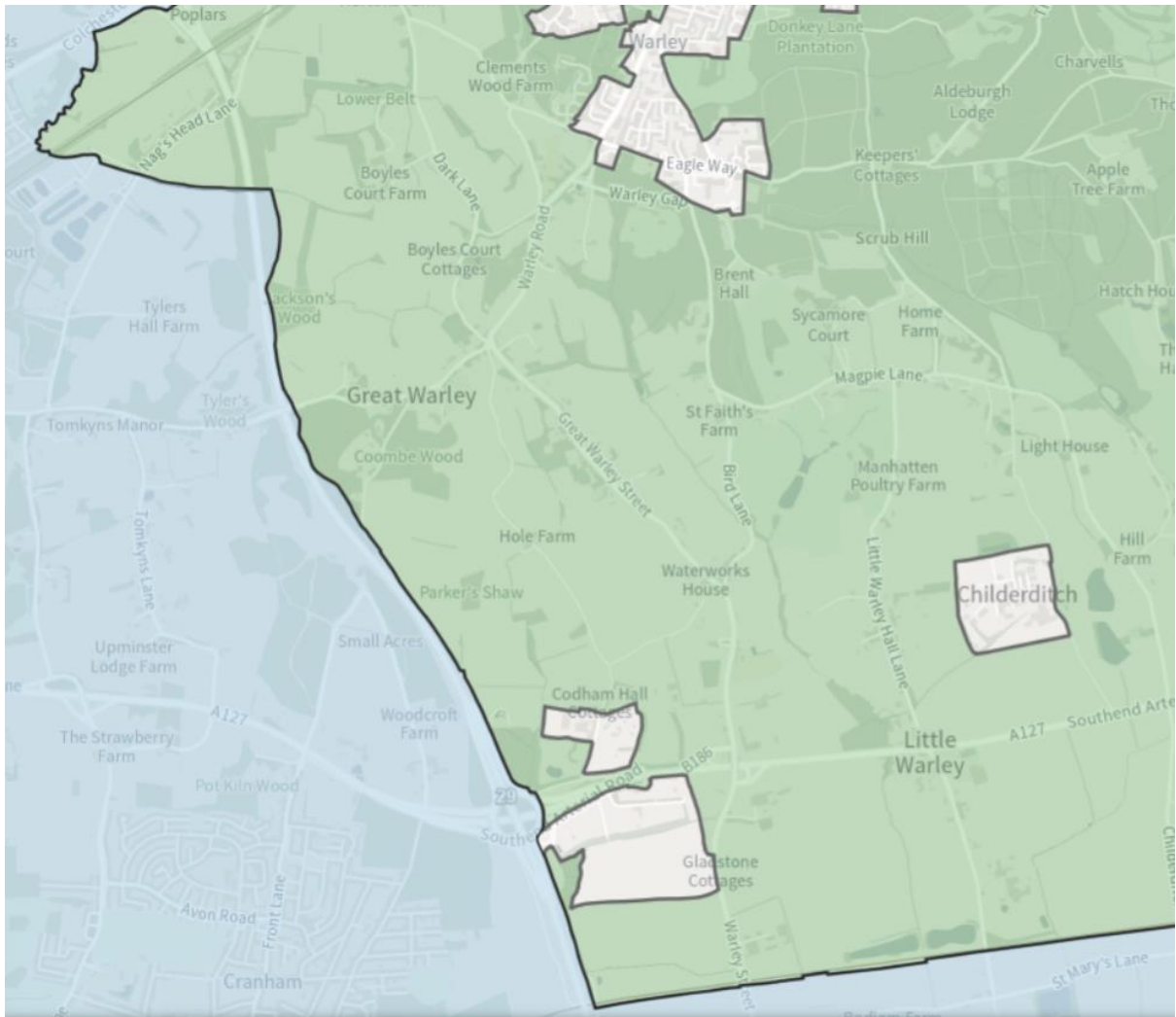
STRATEGIC POLICY MG02: GREEN BELT

- A. The Metropolitan Green Belt within Brentwood Borough (as defined in the Brentwood Policies Map) will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions. Planning

permission will not be granted for inappropriate development in the Green Belt other than in very special circumstances.

- B. All development proposals within the Green Belt will be considered and assessed in accordance with the provisions of national planning policy.
- C. The Council will seek to enhance the beneficial use of the Green Belt to provide or improve access to it; to provide or enhance opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity and; to improve damaged and derelict land. Development proposals in or adjacent to the Green Belt (including those the subject of allocations in this plan) will be expected to include measures to achieve these objectives so far as it is possible and appropriate.
- D. For site allocations which are being released from the Green Belt, development proposals should set out ways in which the impact of removing land from the Green Belt are to be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.

Policies Map extract (interactive version) – Green Belt



Pages 48-51 – Developer Contributions

POLICY MG05: DEVELOPER CONTRIBUTIONS

1. All new development should be supported by, and have good access to, all necessary infrastructure. Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered in a timely and, where appropriate, phased manner by the proposal.
2. Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Local Planning Authority and the appropriate infrastructure provider. Such measures may include (not exclusively):
 - a. financial contributions towards new or expanded facilities and the maintenance thereof;
 - b. on-site provision of new facilities;
 - c. off-site capacity improvement works; and/or
 - d. the provision of land.
3. Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.
4. Applicants proposing new development will be expected to make direct provision or contribute towards the delivery of relevant infrastructure as required by the development either alone or cumulatively with other developments, as set out in the Infrastructure Delivery Plan and other policies in this Plan, where such contributions are compliant with national policy and the legal tests. Where necessary, developers will be required to:
 - a. enter into Section 106 (S106) agreements to make provisions to mitigate the impacts of the development where necessary or appropriate. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL; and/or
 - b. make a proportionate contribution on a retrospective basis towards such infrastructure as may have been forward-funded from other sources where the provision of that infrastructure is necessary to facilitate and/or mitigate the impacts of their development (including the cumulative impacts of planned development),

Page 76-82 – Strategic Transport Infrastructure

POLICY BE08: STRATEGIC TRANSPORT INFRASTRUCTURE

In order to support and address the cumulative impacts of planned and other incremental growth, allocated development within the Local Plan and any other development proposals shall (where appropriate) provide reasonable and proportionate contributions to required mitigation measures to strategic transport infrastructure, including:

- a. circulation arrangements, public realm and multimodal integration around Brentwood, Shenfield and Ingatestone stations;
- b. circulation arrangement and public realm around West Horndon station, and the creation of associated multimodal interchange through phases to support new residents and employees;
- c. improvements to the highway network as deemed necessary by transport evidence or as agreed by National Highways and Essex County Council as appropriate, other statutory bodies, stakeholders and passenger transport providers; and
- d. additional and/or improved pedestrian, cycling infrastructure and bus services connecting development to key destinations such as railway stations, education facilities, employment, retail and leisure.

Pages 87-88 – Mitigating the transport impacts of development

POLICY BE12: MITIGATING THE TRANSPORT IMPACTS OF DEVELOPMENT

1. Developments must not have an unacceptable impact on the transport network in terms of highway safety, capacity and congestion.
2. New development proposals will be required to be supported by:
 - a. Travel Plans, Transport Assessments and/or Statements in accordance with the thresholds and detailed requirements for each land use category as set out in the Essex County Council's Development Management Policies or its successors; and engage in an appropriate and proportionate assessment process with National Highways where development has a likelihood to have a material impact on the Strategic Road Network which is not otherwise catered for by programmed works or improvements;
 - b. where necessary, reasonable and proportionate financial contributions and/or take reasonable measures to:
 - i. mitigate the cumulative transport impact of the development to an acceptable degree, including relevant highways measures identified in the IDP Part B; and
 - ii. accommodate the use of sustainable modes of transport including borough-wide sustainable transport measures identified in the IDP Part B, investment in infrastructure, services, Low Emission Zone,

or measures to promote behavioural change (including enforcement).

Pages 98-104 - Heritage Assets

POLICY BE16: CONSERVATION AND ENHANCEMENT OF HISTORIC ENVIRONMENT

A. All Designated Assets

1. Great weight will be given to the preservation of a designated heritage asset and its setting. Development proposals affecting a designated asset, including a listed building, conservation area, registered parks and gardens, or scheduled monument, will be required to:
 - a. sustain and wherever possible enhance the significance of the assets and its settings (including views into and out of conservation areas and their settings);
 - b. be supported by a Heritage Statement providing sufficient information on the significance of the heritage asset (according to its importance), the potential impacts of the proposal on the character and significance of the asset and its setting, and how the proposal has been designed to take these factors into account. The Statement should make an assessment of the impact of the development on the asset and its setting and the level of harm that is likely to result, if any, from the proposed development;
 - c. provide clear justification for any works that would lead to any harm to the asset.
2. Proposals that make sensitive and appropriate use of heritage assets, particularly where these bring redundant or under used buildings or buildings on the At Risk Register, into appropriate use consistent with their conservation status will be supported.

3. Proposals designed to enhance an asset and/or its setting and which reinforce its significance and contribution to the character of an area will be supported.
4. Development proposals that would be likely to cause either less than substantial or substantial harm to, or loss or partial loss of, a designated asset or its setting will be assessed in accordance with the statutory framework and national planning policy.
5. Where a proposed development involves the loss or partial loss of a designated asset, applicants will be required to record and advance understanding of the asset in a manner proportionate to its importance and the impact which will be caused.

B. Conservation Areas

In addition to satisfying the relevant criteria in A above:

1. Permission for proposals which involve the demolition or partial demolition of a building in a conservation area will only be granted subject to a condition and/or a planning obligation (as appropriate) that no demolition will take place until an enforceable contract has been let for the carrying out of the new development.
2. Development will be permitted in a conservation area where the siting, design and scale of the proposed development would preserve or enhance its character or appearance and important views into and out of the area are preserved or enhanced.

C. Non-Designated Heritage Assets

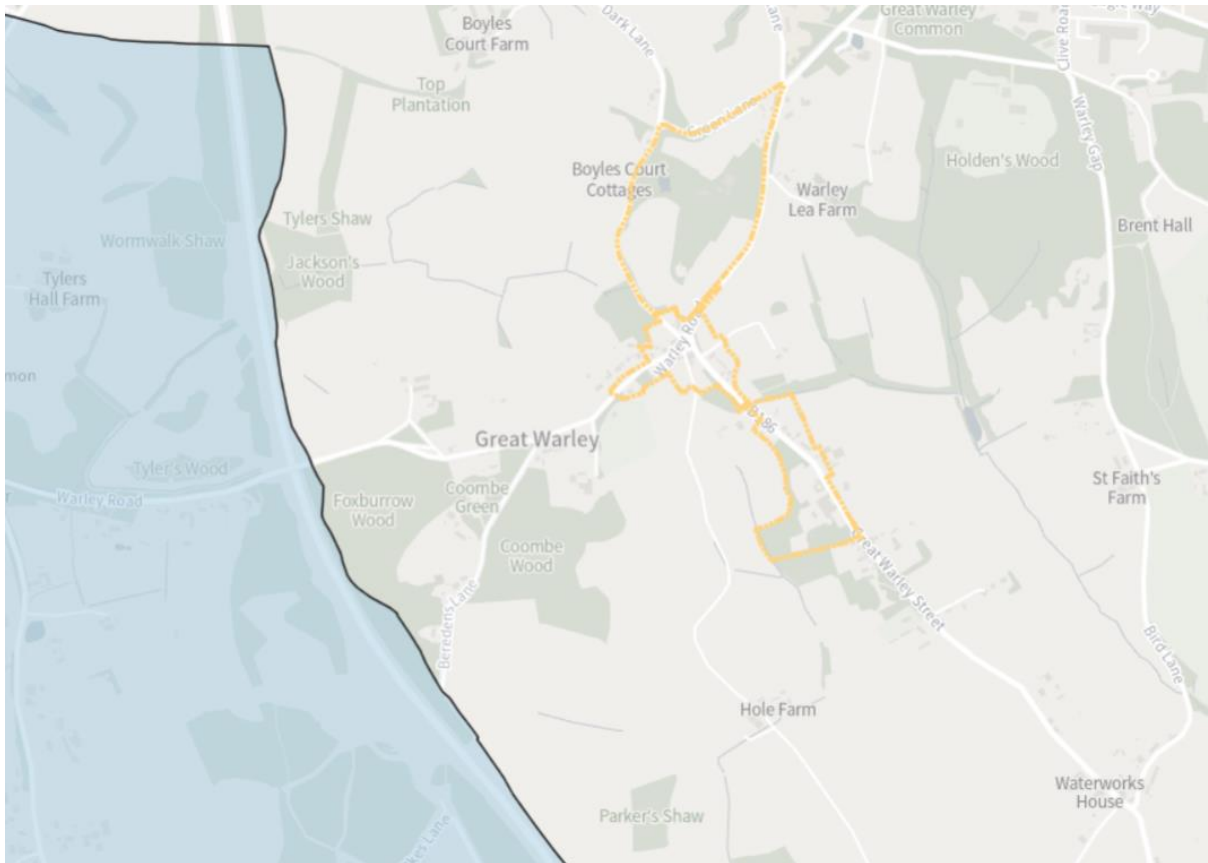
Development proposals that affect non-designated heritage assets and their settings, including protected lanes, should seek to preserve and wherever possible enhance the asset and its setting. When considering proposals which are likely to cause harm to such an asset consideration will be given to:

- a. the significance of the asset and its setting; and
- b. the extent to which the scale of any harm or loss harm has been minimised.

D. Specific Requirements

Specific requirements in relation to particular heritage assets identified in housing allocation policies should be read alongside the overarching requirements of this policy.

Policies Map extract (interactive version) - Conservation Areas (Great Warley)



Local Heritage List Map extract (assets in Great Warley)

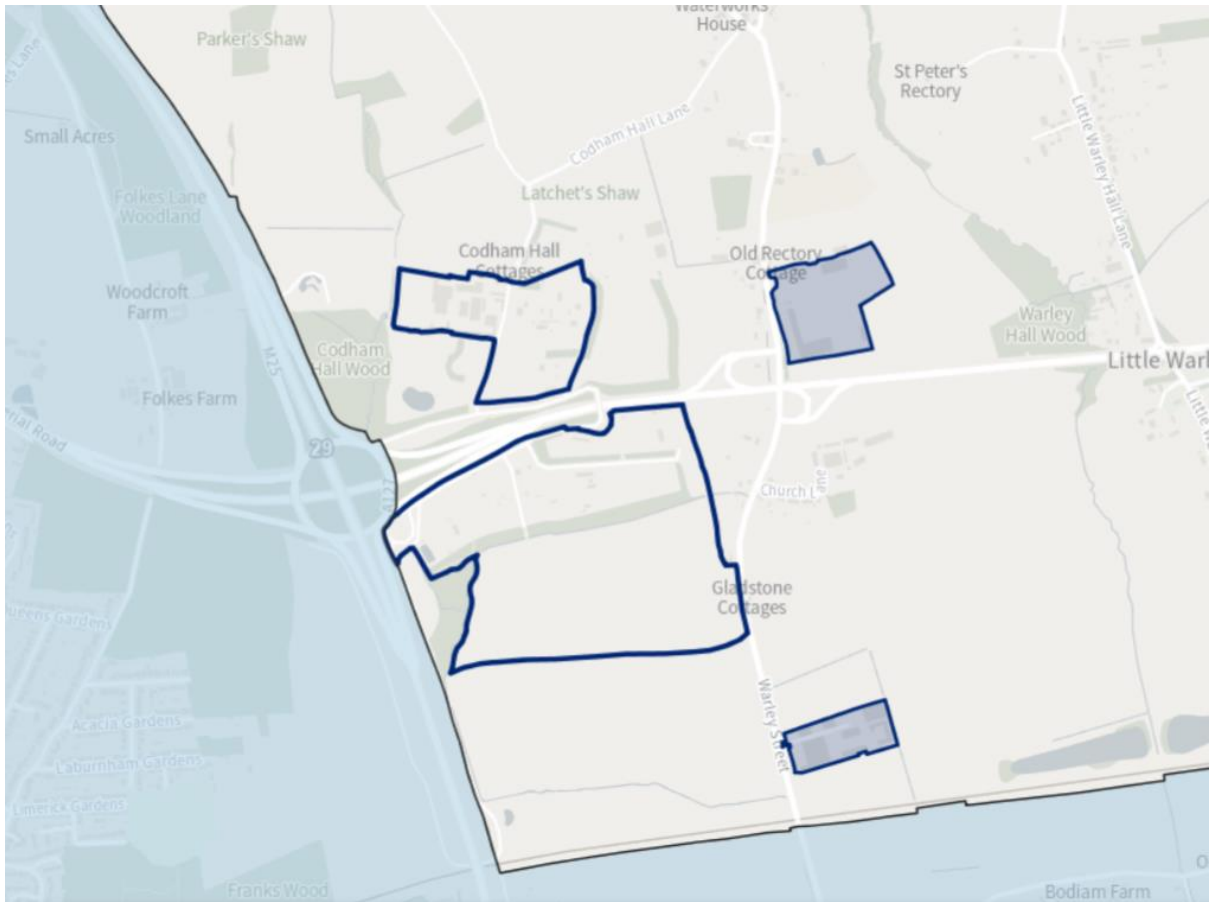


Pages 134-138 – Safeguarding Employment Land

STRATEGIC POLICY PC01: SAFEGUARDING EMPLOYMENT LAND

1. In order to maintain sufficient employment land supply to meet identified needs, within those areas designated for general employment development, as shown on the Brentwood Policies Map, the Council will only approve redevelopment proposals from offices, light industrial, research and development (within Class E), B2, B8 or sui generis employment uses to non-employment uses where one or more of the following criteria apply:
 - a. the proposal is for ancillary non-residential uses that provide employment, and there is no reasonable prospect for the site to be used for the above purposes; or
 - b. the proposal is for any other use and the application is supported by reliable evidence of reasonable efforts made to secure re-use for all of the above uses including ancillary non-residential uses that provides employment and which evidence demonstrates there is no realistic prospect of the site or buildings being used or re-used for these purposes in their own right or, through refurbishment, adaptation, subdivision or redevelopment.
2. Development proposals (including the redevelopment of existing developed areas) on designated employment land within the Green Belt will be considered in line with national and local green belt policy.

Policies Map extract (interactive version) – Safeguarded employment sites



Pages 162-165 – Protecting and enhancing the natural environment

STRATEGIC POLICY NE01: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT

1. The Council will require development proposals to use natural resources prudently and protect and enhance the quality of the natural environment. All proposals should, wherever possible, incorporate measures to secure a net gain in biodiversity, protect and enhance the network of habitats, species and sites (both statutory and non-statutory) and avoid negative impacts on biodiversity and geodiversity. Compensatory measures will only be considered if it is not possible fully to mitigate any impacts.
2. When determining planning applications, the council will apply the principles relevant to habitats and biodiversity as set out in National Planning Policy.

International Designated Sites

3. Where a proposed development is likely to have an adverse impact on European Designated Site (whether individually or in combination with other plans or proposals) permission will not be granted unless there is due compliance with the requirements of the Habitats Regulations.
4. New residential development within the Essex RAMS and Epping Forest SAC Zones of Influence will be required to provide appropriate on-site measures for the avoidance of, and/or reduction in, recreational disturbance on European Designated Sites through the incorporation of recreational opportunities, including the provision of green space and footpaths in the proposals. Proposals will be required to follow the mitigation hierarchy by seeking to avoid creating recreational impacts first and foremost, with mitigation measures considered separately to avoidance.

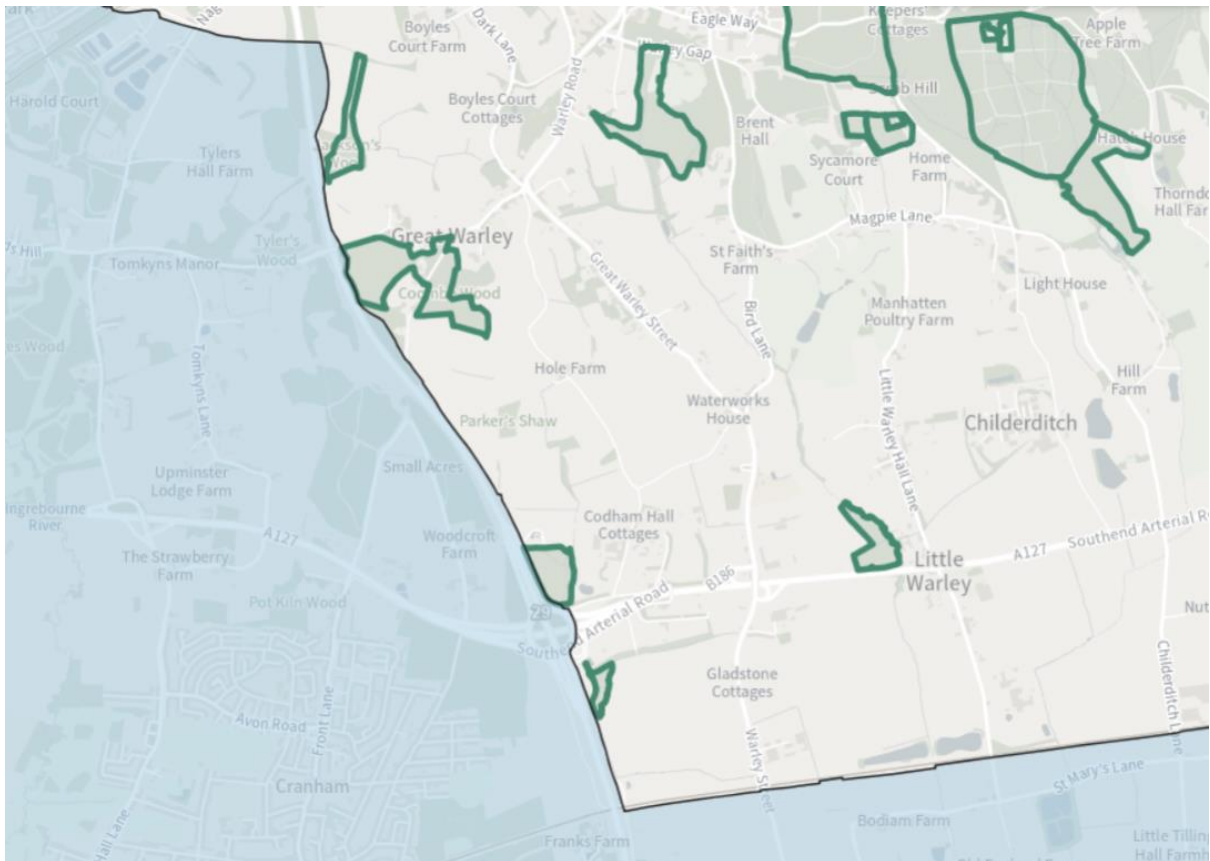
Nationally Designated Sites

5. Development proposals within or outside a SSSI, likely to have an adverse effect on a SSSI (either individually or in combination with other developments), will not be permitted unless, exceptionally, the benefits of the proposed development clearly outweigh both the adverse impacts on the features of the site that make it of national importance and any impacts on the wider network of SSSIs.

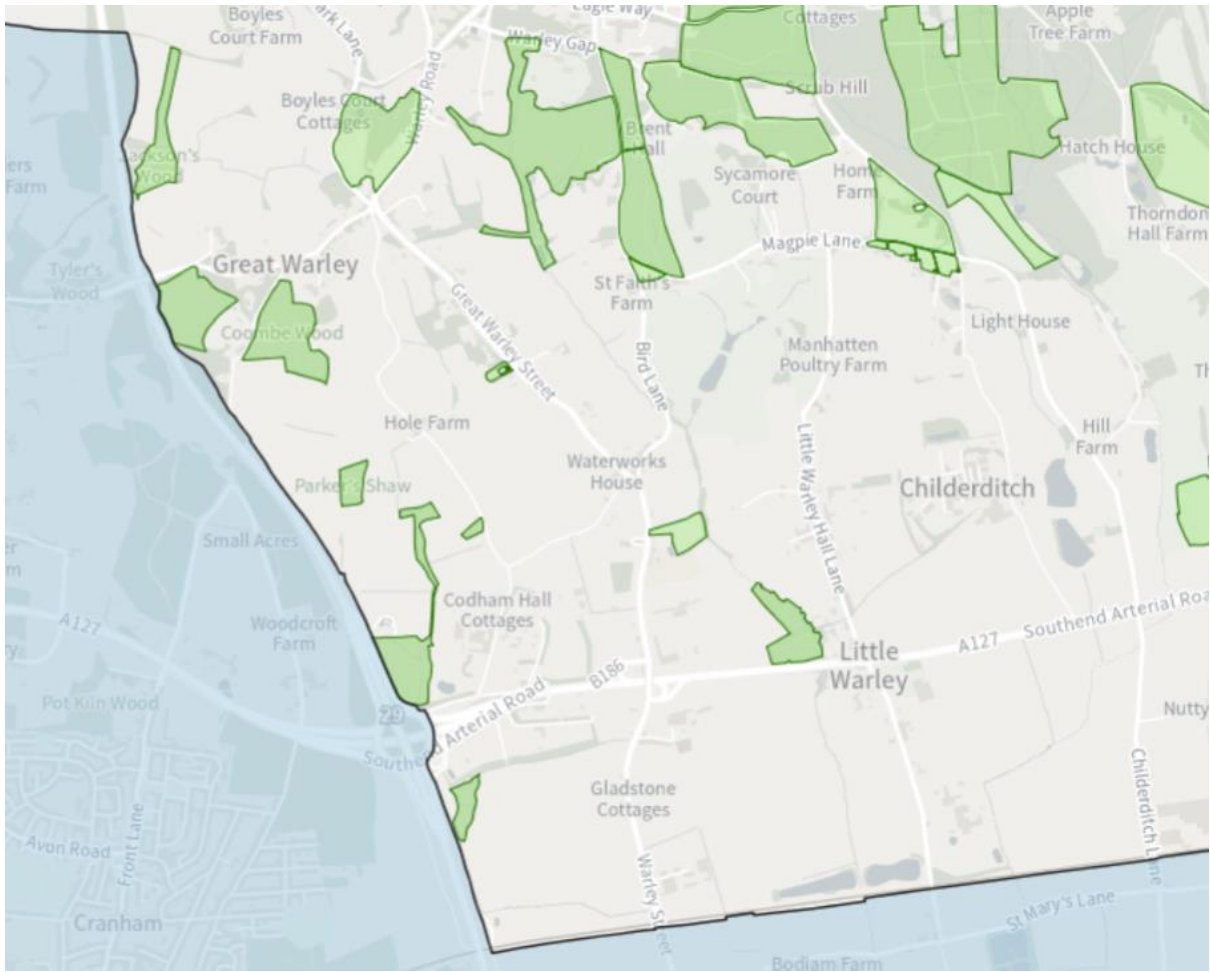
Sites of Local Importance

6. Development proposals that are likely adversely to affect locally designated sites, including their functional status within any identified ecological network, will only be permitted where the applicant can demonstrate that:
 - a. the ecological coherence of the site and any local ecological network is maintained; and
 - b. it can be demonstrated that the benefits of the development clearly outweigh the loss.

Policies Map extract (interactive version) – Ancient Woodlands



Policies Map extract (interactive version) - Local Wildlife Sites



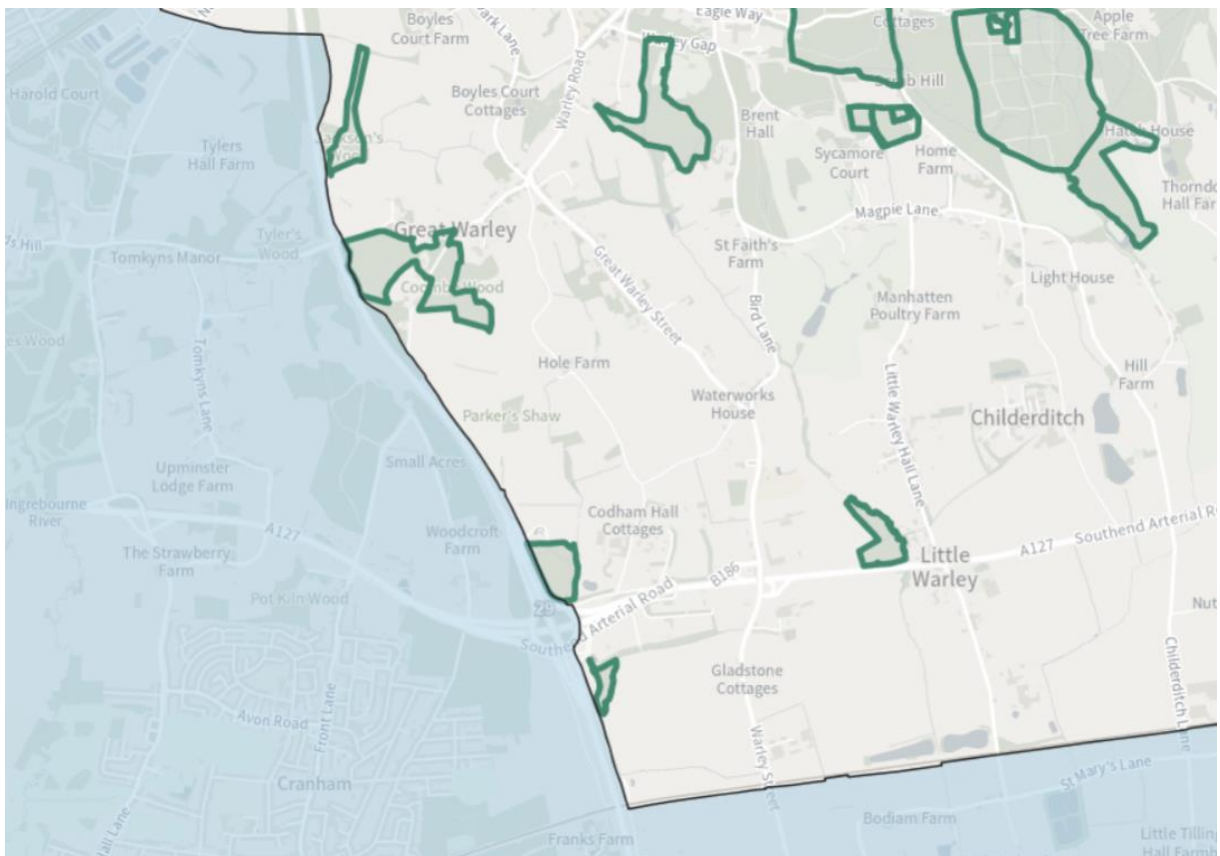
Pages 170-171 – Trees, woodlands, hedgerows

POLICY NE03: TREES, WOODLANDS, HEDGEROWS

1. Development proposals that would result in the deterioration or loss of irreplaceable ancient woodland and ancient and veteran trees will not be permitted other than in wholly exceptional circumstances and only if the proposals include a suitable compensation strategy. Applicants will need to demonstrate the efficacy of the strategy by reference to the value of the habitats that will be lost or harmed and provide an appropriate implementation and maintenance programme to underpin the strategy the performance of which will be subject of a condition and/or planning obligation, as appropriate.

2. In all other cases, proposals should, so far as possible and practicable, seek to retain existing trees, woodlands and hedgerows where they make a positive contribution to the local landscape and/or biodiversity or which have significant amenity value. Wherever possible and appropriate, landscaping schemes should take account of and incorporate these existing features in the scheme and where any loss is unavoidable, incorporate measures to compensate for their loss.

Policies Map extract (interactive version) – Ancient Woodlands

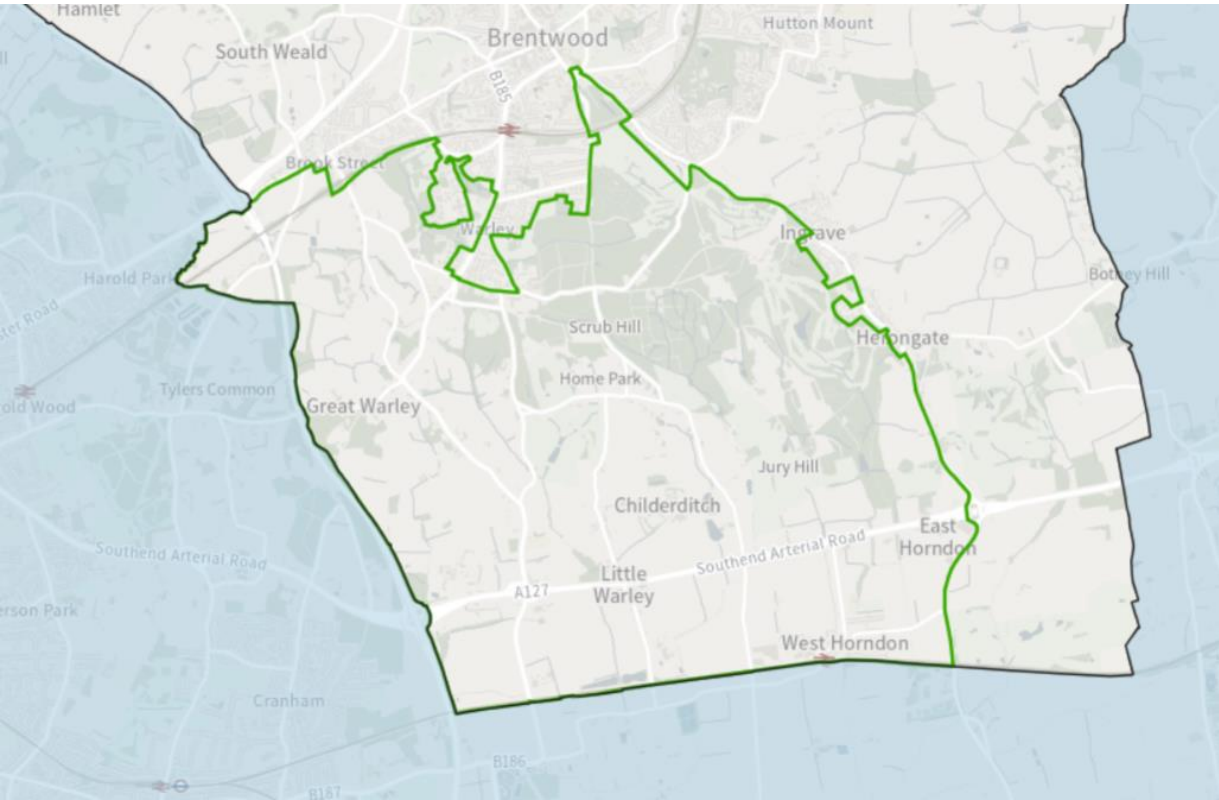


Pages 171-172 – Thames Chase Community Forest

POLICY NE04: THAMES CHASE COMMUNITY FOREST

Development proposals which fall within the Thames Chase Community Forest Area should not prejudice the implementation, aims and objectives of the Thames Chase Plan.

Policies Map extract (interactive version) – Thames Chase Community Forest



Pages 178-181 – Air Quality

STRATEGIC POLICY NE08: AIR QUALITY

1. Development is required to meet national air quality standards and identify opportunities to improve air quality or mitigate local exceedances and impacts to acceptable legal and safe levels. Development proposals must demonstrate that they will not:
 - a. Compromise the achievement of compliance targets within Air Quality Management Areas (AQMAs);
 - b. Create new exceedance areas; and
 - c. Create unacceptable risk of high levels of exposure to poor air quality, particularly where development is near to, or promotes land uses to be used by those particularly vulnerable to poor air quality (such as children and older adults).
2. Development proposals should be designed to minimise exposure to existing poor air quality and make appropriate provisions to improve local air quality conditions through design solutions and measures to the outdoor and indoor environment. Particular attention should be given to the positioning, layout and design of proposals for new build developments and community infrastructure (indoor and outdoor) that are likely to be used by large volumes of people on a daily basis, especially by vulnerable groups. Community infrastructure should, where possible incorporate appropriate buffer zones to prevent or minimise exposure to air pollution sources.
3. An Air Quality Impact Assessment is required as part of any planning application for:
 - a. major developments;
 - b. employment led developments;
 - c. developments which will require substantial earthworks or demolition;
 - d. developments which include community infrastructure including leisure, education and health facilities or open space (including child play space);

- e. new build developments in areas along busy or congested road and rail lines where residents will be exposed to poor air quality;
 - f. developments which propose the use of Combined Heat and Power, biomass boilers or similar solutions that might impact air quality; and
 - g. new developments within AQMAs.
4. Development proposals should have regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of (A) and (B) above will be resisted unless appropriate measures are implemented to ensure adverse impacts can be mitigated to an acceptable level. Mitigation should be provided onsite unless it can be demonstrated that it is inappropriate and that off-site provision will deliver equivalent or wider benefits.

Pages 181-185 – Flood Risk

STRATEGIC POLICY NE09: FLOOD RISK

1. New development will be required to avoid areas of flood risk by applying the Sequential and, where necessary, the Exception Tests in accordance with national policy and guidance.
2. A site specific Flood Risk Assessment must assess all sources of flooding. It should demonstrate how flood risk will be managed over the development's lifetime, taking climate change into account. A site specific FRA is required, in

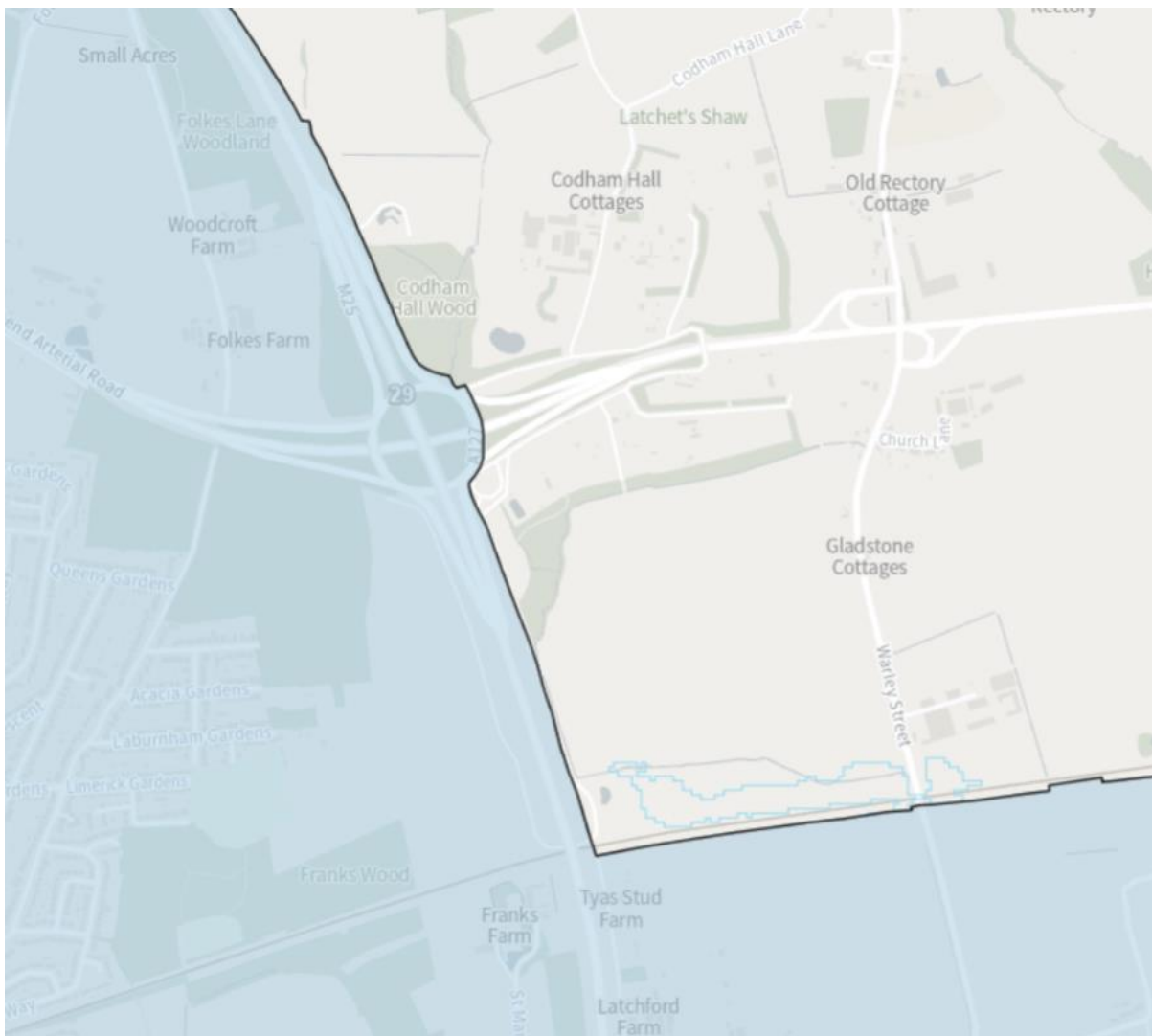
accordance with national policy guidance, for the following types of development:

- a. all new development greater than 1 ha in size in Flood Zone 1;
- b. all development within a Critical Drainage Area;
- c. all new development (including minor development and change of use) in flood zones 2 and 3;
- d. new development or a change of use to a more vulnerable class which may be subject to other sources of flooding.

3. Where proposals satisfy the Sequential and Exception Tests design proposals should ensure that:
 - a. the most vulnerable land uses are located in areas within the site that are at lowest risk of flooding;
 - b. development will be safe for its lifetime taking account of the vulnerability of its users,
 - c. flood risk will not increase elsewhere;
 - d. development would not constrain the natural function of the flood plain, either by impeding flow or reducing storage capacity;
 - e. development is constructed so as to remain operational even at times of flood through resistant and resilient design;
 - f. appropriate mitigation measures are incorporated to address any residual flood risk safely, including safe access and egress for all likely users of the development;

- g. where necessary incorporate flood resistant and flood resilient design measures such that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment;
- h. incorporate sustainable drainage systems in line with Policy BE05 Sustainable Drainage, unless there is clear evidence that this would be inappropriate;
- i. where possible, the development will reduce flood risk overall.
- j. safe access and escape routes are included where appropriate, as part of an agreed Emergency Response Plan, where required.

Policies Map extract – Flood Zone 2



Pages 187-188 – Floodlighting and Illumination

POLICY NE11: FLOODLIGHTING AND ILLUMINATION

1. Development proposals involving floodlighting or any other means of illumination (other than advertisements) will only be permitted where the scheme:
 - a. is appropriate for the intended use and has been appropriately designed to prevent light spillage ;
 - b. is energy efficient;
 - c. provides the minimum level of light necessary to achieve its purpose;
 - d. uses an appropriate light spectrum and specification that will not be harmful to nocturnal wildlife or human health;
 - e. does not impact unacceptably on the night sky or give rise to any unacceptable increase in sky glow; and
 - f. ensures the appearance and design of the installation when unlit is sympathetic to the character and design of the development of which it forms part and will when lit have no unacceptable adverse effect on visual amenity, highway safety, landscape or the historic character of the area.
2. Applicants will need to submit a full lighting strategy, proportionate to their application, specifying details of external lighting, its power and type, the overall level and distribution of illumination and times of operation. Appropriate conditions will be imposed to restrict lighting levels and hours of use or require measures to be taken to minimise adverse effects where reasonably necessary.

Pages 245-246 – Strategic Employment Allocations, Brentwood Enterprise Park

POLICY E11: BRENTWOOD ENTERPRISE PARK

Land south east of M25 Junction 29 is allocated for around 25.85 ha of land for employment development (principally for offices, light industrial and research and development, B2 and B8 and other sui generis employment uses). Other ancillary supporting development within classes C1, E and F1 or other sui generis ancillary supporting development may be permitted as a means of supporting these principal employment uses.

1. Development Principles

Proposals should:

- a. be accompanied by a high quality landscaping scheme (including a scheme of maintenance) for the site as a whole with the objective also to provide improved visual amenity between the site and adjoining Green Belt;
- b. be of a high quality in terms of its design and layout to reflect its status as a key gateway site;
- c. protect and where possible enhance the adjoining Local Wildlife Site (Hobbs Hole);
- d. preserve and where possible enhance the Public Right of Way through the site.

2. Infrastructure Requirements

Proposals should provide:

- a. access via M25 Junction 29 and/or Warley Street (B186) and associated slip roads;

- b. well-connected internal road layouts which allows good accessibility for bus services;
- c. new public transport or Demand Responsive Travel links with the surrounding area; and
- d. good walking and cycling connections within the site and to the surrounding area.

3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the Junction 29 mitigation and A127/B186 works, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;
- b. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.

**Policies Map extract (interactive version) – Employment Site Allocations E11
Brentwood Enterprise Park (southern area) and E10 Codham Hall Farm
(northern area)**



Pages 248-250 – Employment Allocations, Codham Hall Farm

POLICY E10: CODHAM HALL FARM

Land at Codham Hall Farm, north east of M25 Junction 29 is allocated for around 9.6 ha of land for employment development which may comprise offices, light industrial, research and development (within Class E), B2, B8 or sui generis

employment uses. Other ancillary supporting development may be permitted as a means of supporting these principal employment uses.

1. Development Principles

Proposals for development (including the redevelopment of existing developed areas) should:

- a. provide access via M25 Junction 29 and Warley Street (B186);
- b. protect and where possible enhance the adjoining Local Wildlife Site (Codham Hall Wood);
- c. preserve and where possible enhance the Public Right of Way through the site;
- d. provide good walking and cycling connections within the site and to the surrounding area; and
- e. be accompanied by an appropriate landscaping treatment scheme for the site as a whole to improve visual amenity on site, and safeguard and where possible and appropriate, enhance the visual amenity of the adjoining green belt.

2. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. necessary off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the A127/B186 works, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;
- b. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.

**Policies Map extract (interactive version) – Employment Site Allocations E11
Brentwood Enterprise Park (southern area) and E10 Codham Hall Farm
(northern area)**



Appendix 2: Site location plans for relevant developments, permitted or pending consideration

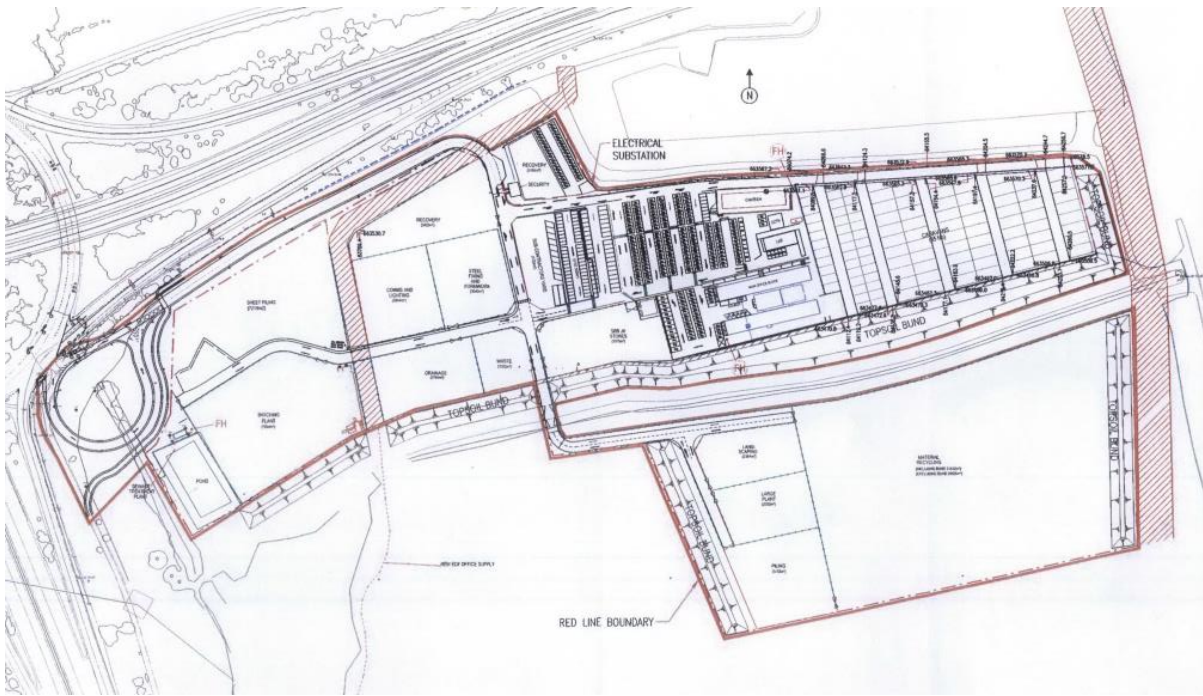
A. Planning History

- i. Land South of A127 East of M25 Junction 29, Codham Hall (Brentwood Enterprise Park) (Ref: 17/00549/EIASO) (site location plan)

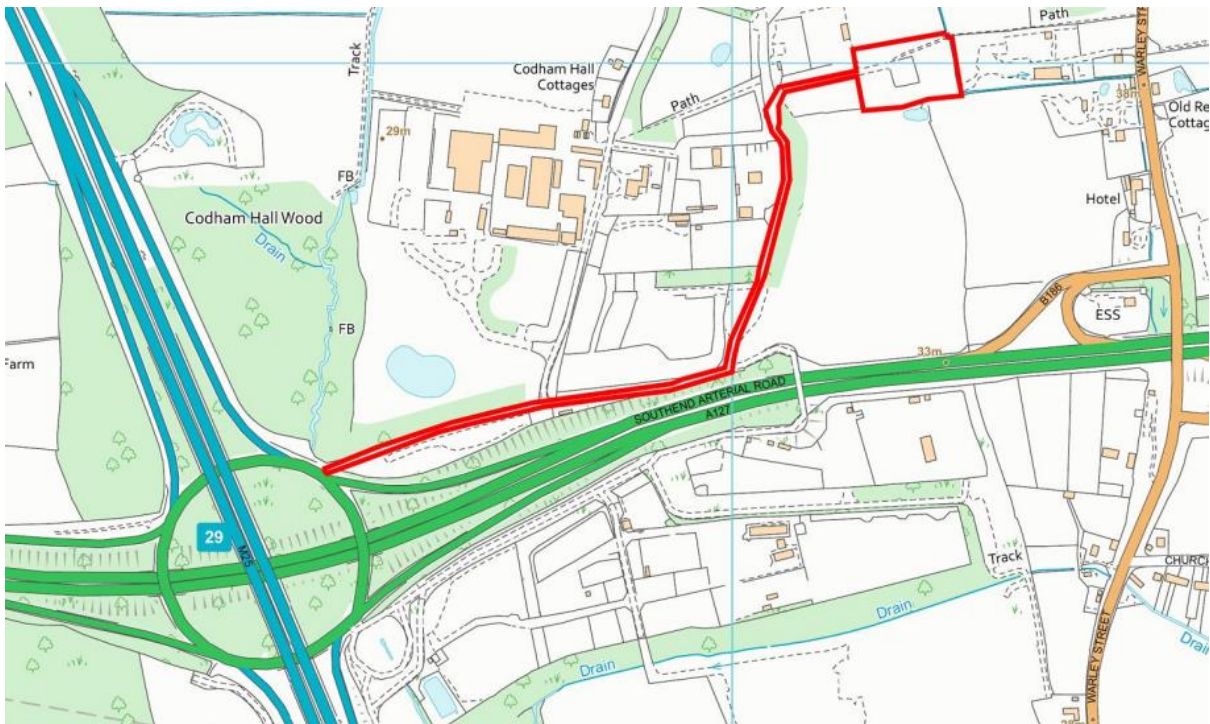


- ii. Land Adjacent to Codham Hall (12/00331/EIASO) (Site location plan and proposed layout plan)

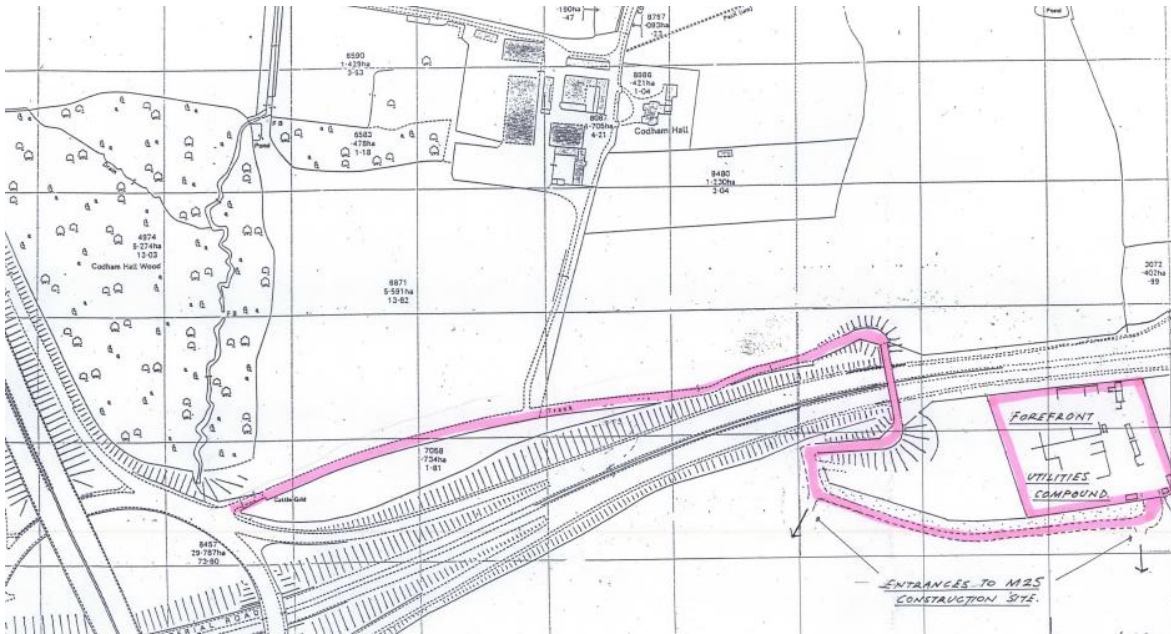




iii. Codham Hall Farm (19/00502/FUL) (site location plan)



- iv. Codham Hall Farm, Codham Hall Lane, Great Warley (ESS/07/13/BRW) (site location plan)



- v. Codham Hall Farm, Codham Hall Lane, Great Warley (ESS/07/13/BRW) (site location plan)

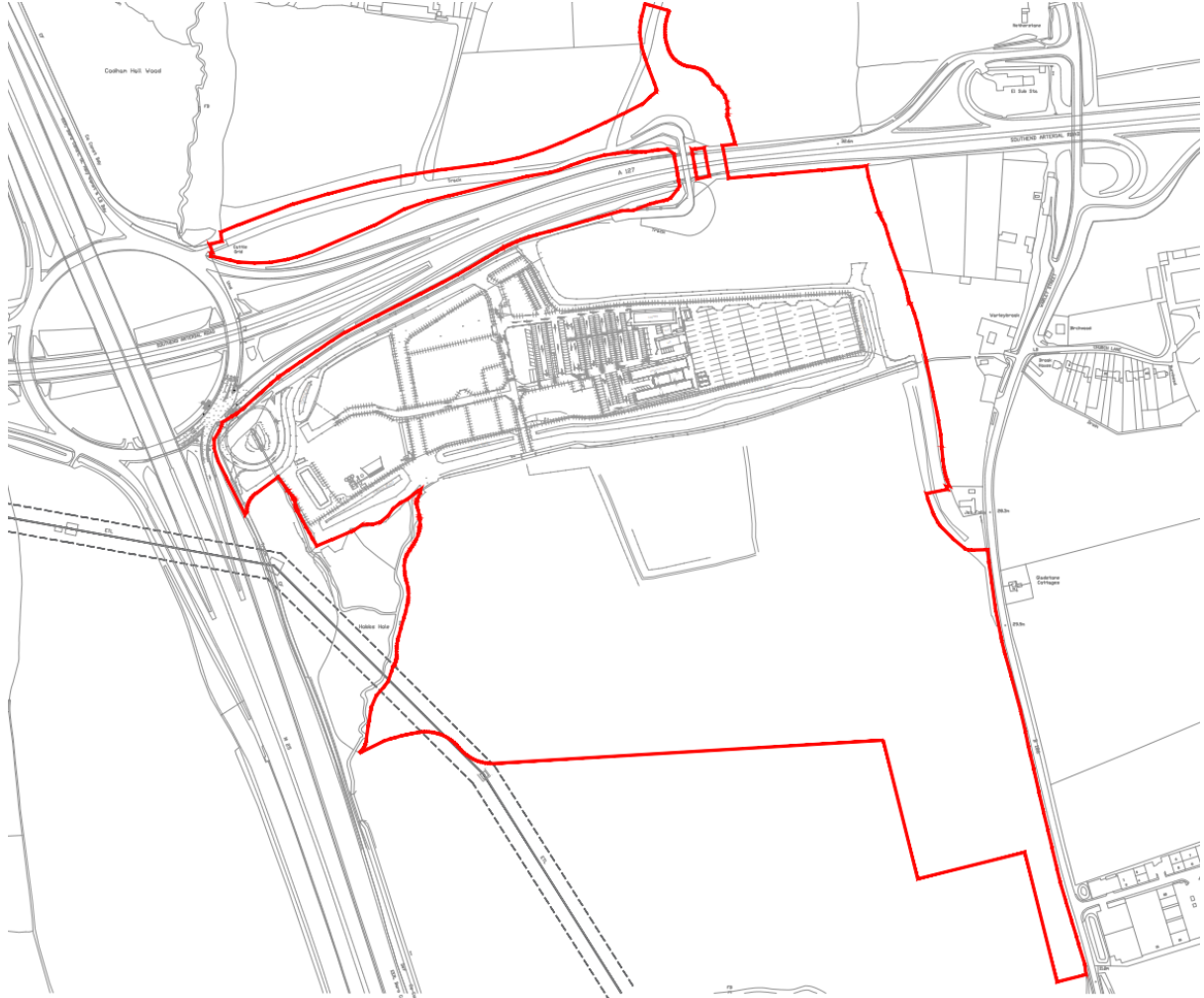
As per item iv) above.

- vi. Codham Hall Farm, Codham Hall Lane, Great Warley (ESS/07/13/BRW) (site location plan)

- vii. As per item iv) above.

B. Relevant development proposals under consideration or granted permission but not commenced or completed

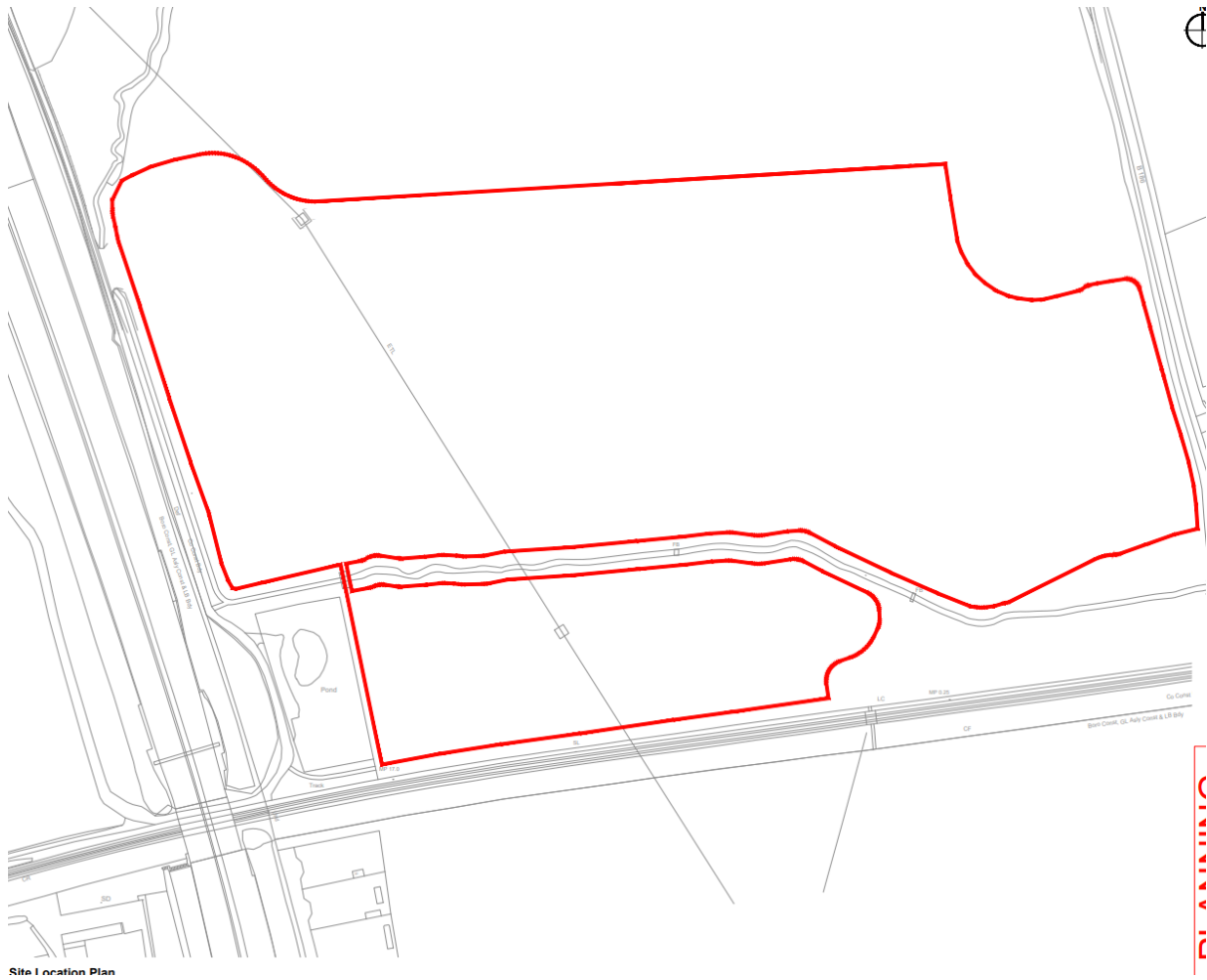
- i. Land South Of A127 East Of M25 Junction 29, Codham Hall (Brentwood Enterprise Park) (ref: 22/00402/FUL) (site location plan)



- ii. Land South Of A127 East Of M25 Junction 29, Codham Hall (Brentwood Enterprise Park) (ref: 22/00402/FUL) (proposed masterplan)

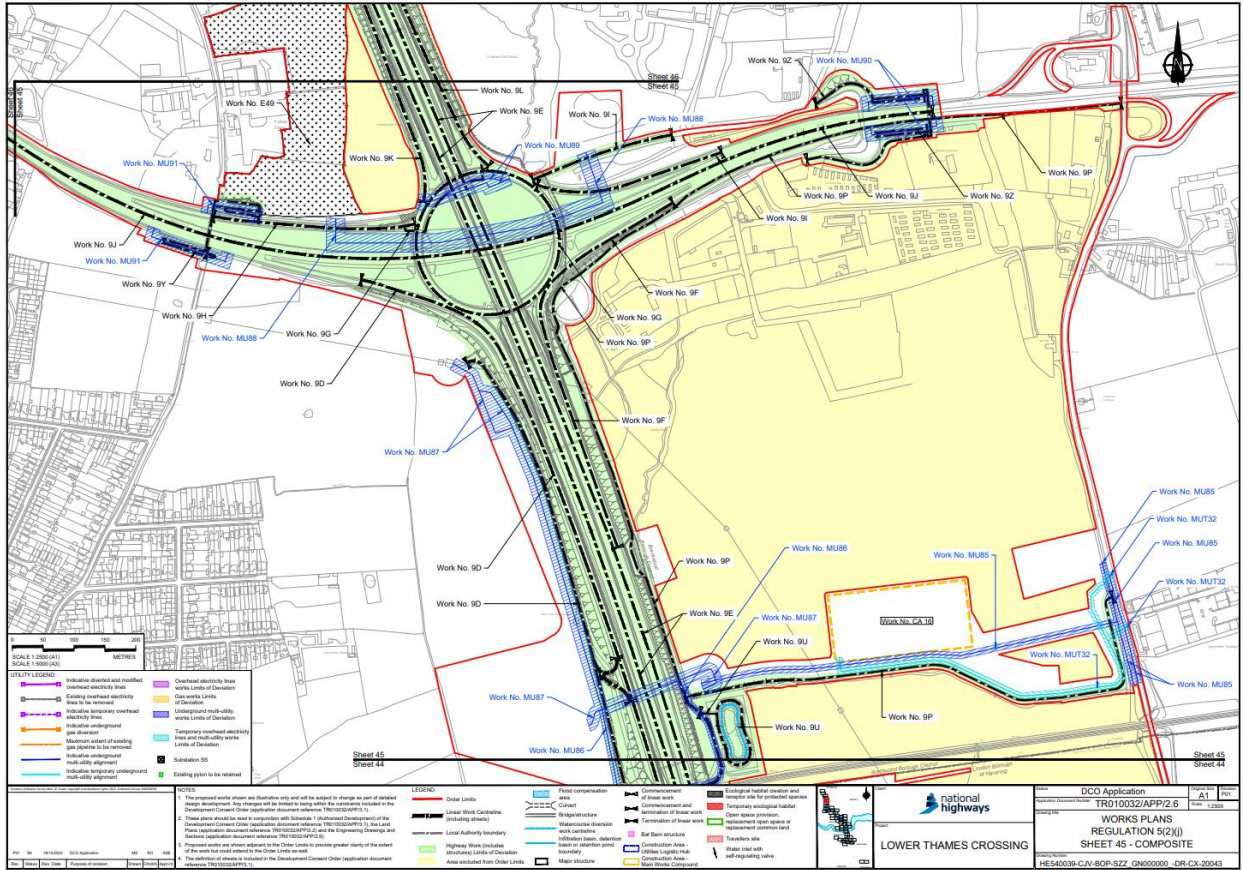


iii. Land opposite Upminster Trading Park (ref: 22/00587/FUL) (Site location plan)

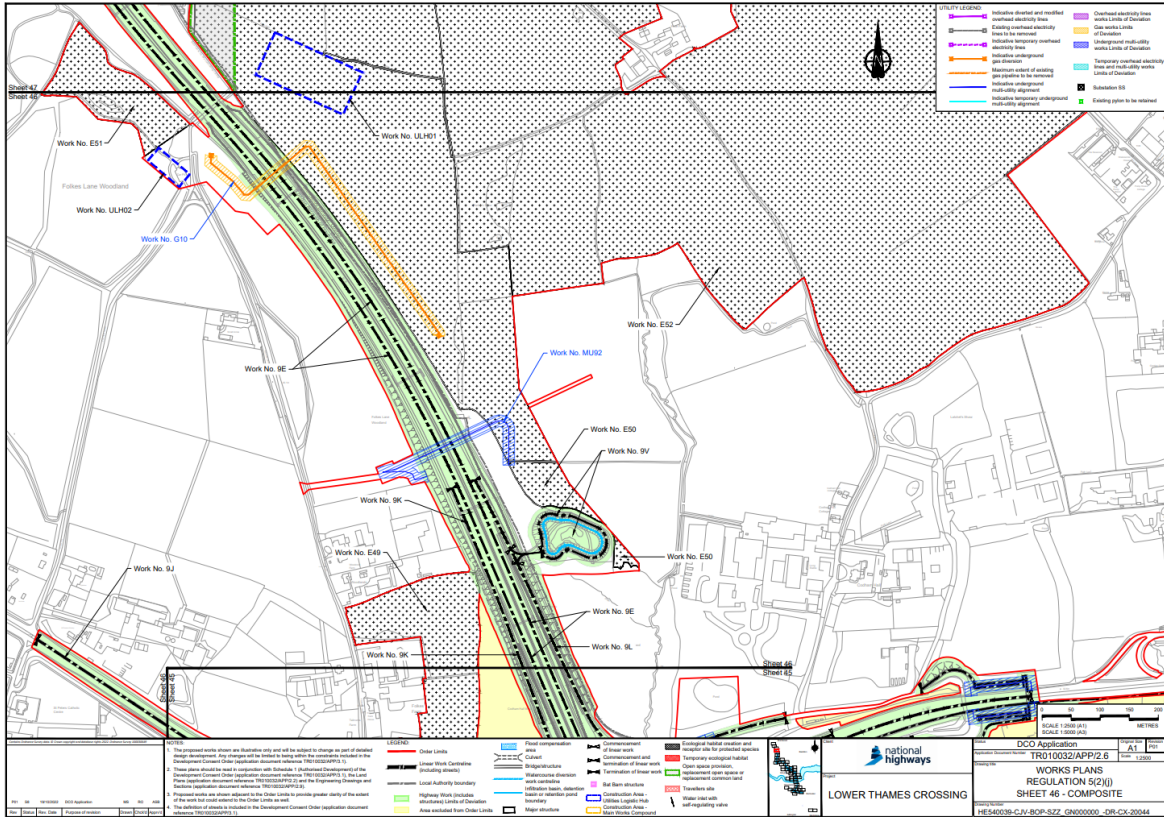


Appendix 3: Extracts of DCO Application Plans relevant to BBC administrative area – Document 2.6: Works Plans Composite (Document ref: TR010032/APP/2.17)

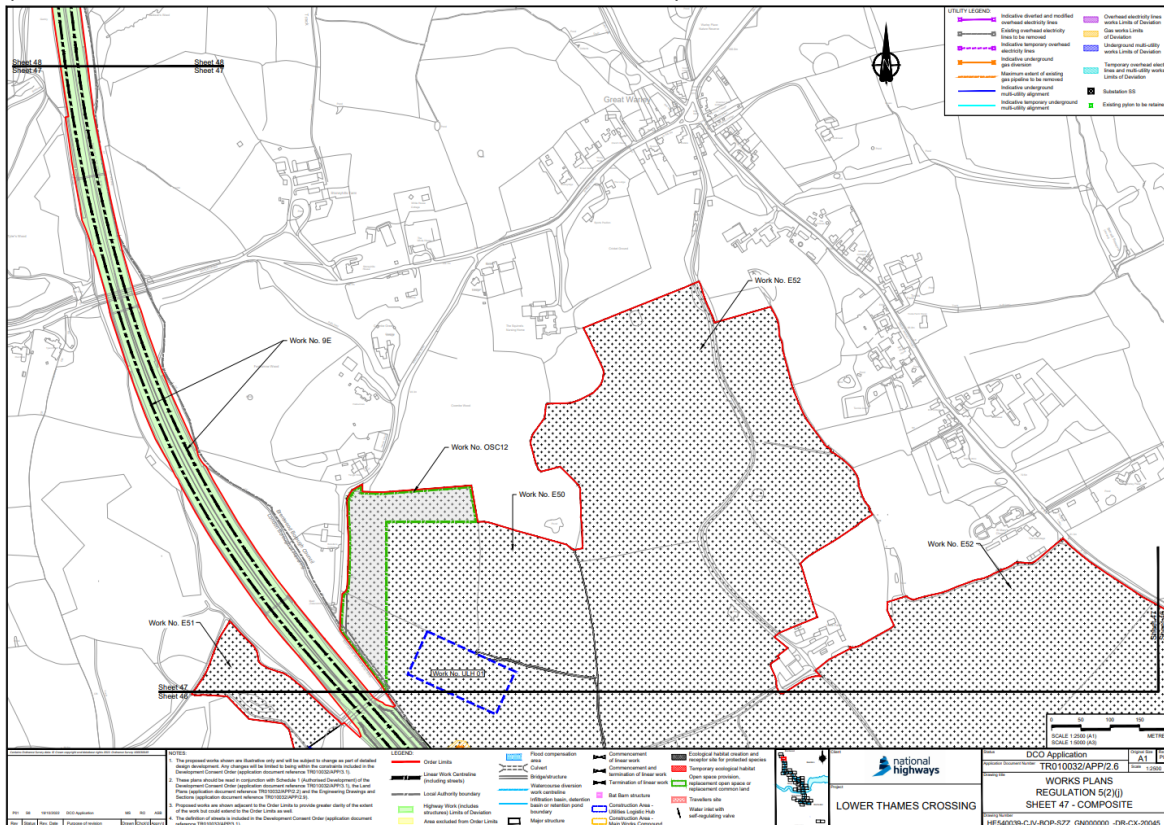
A. Works Plans Composite - Sheet 45 (M25 junction 29 and surrounding land)
 (Work Numbers: 9D, 9E, 9F, 9G, 9I, 9J, 9K, 9L, 9P, 9U, 9Z, MU85, MU87, MU88, MU89, MU90, MUT32)



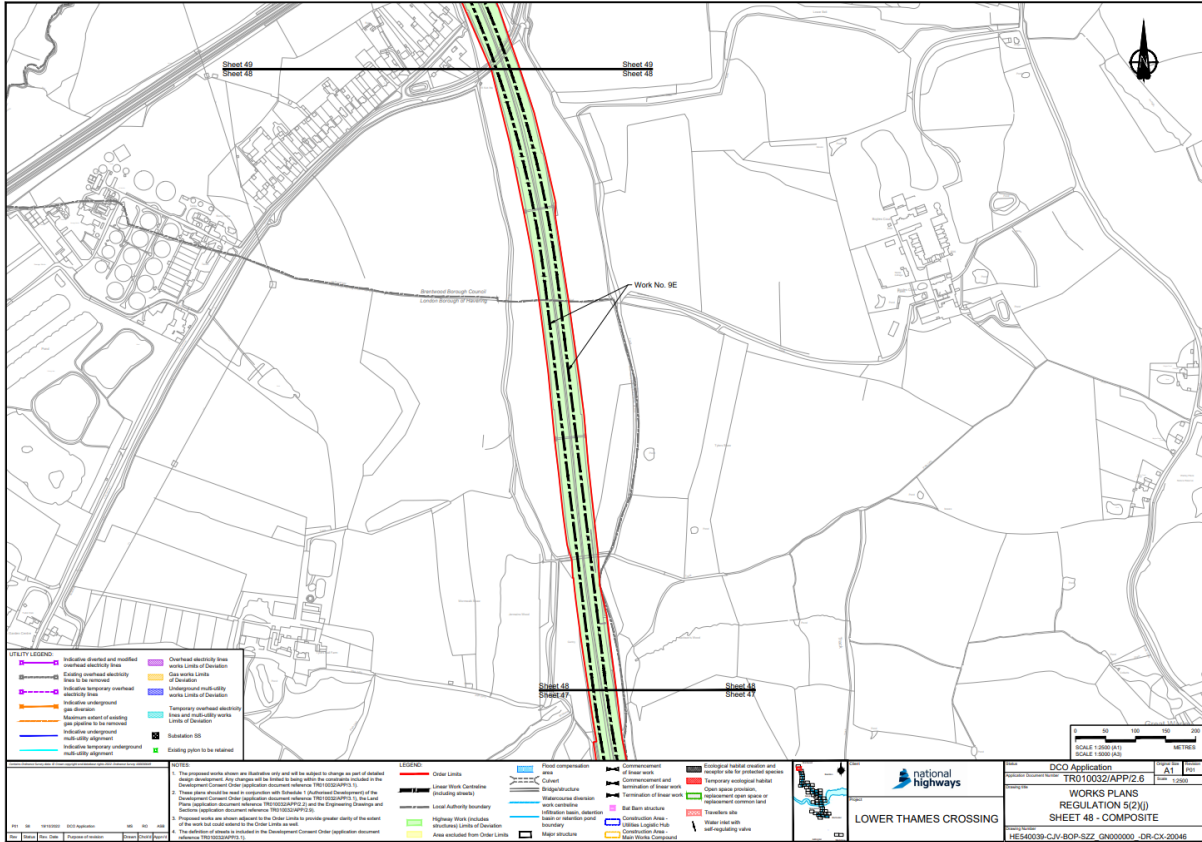
B. Works Plans Composite - Sheet 46 (Codham Hall Farm & Hole Farm area)
 (Work Numbers: 9E, 9K, 9L, 9V, E50, E52G10, MU92, ULH01)



C. Works Plans Composite - Sheet 47 (Hole Farm)
 (Work Numbers: 9E, E50, E52, OSC12, ULH01)



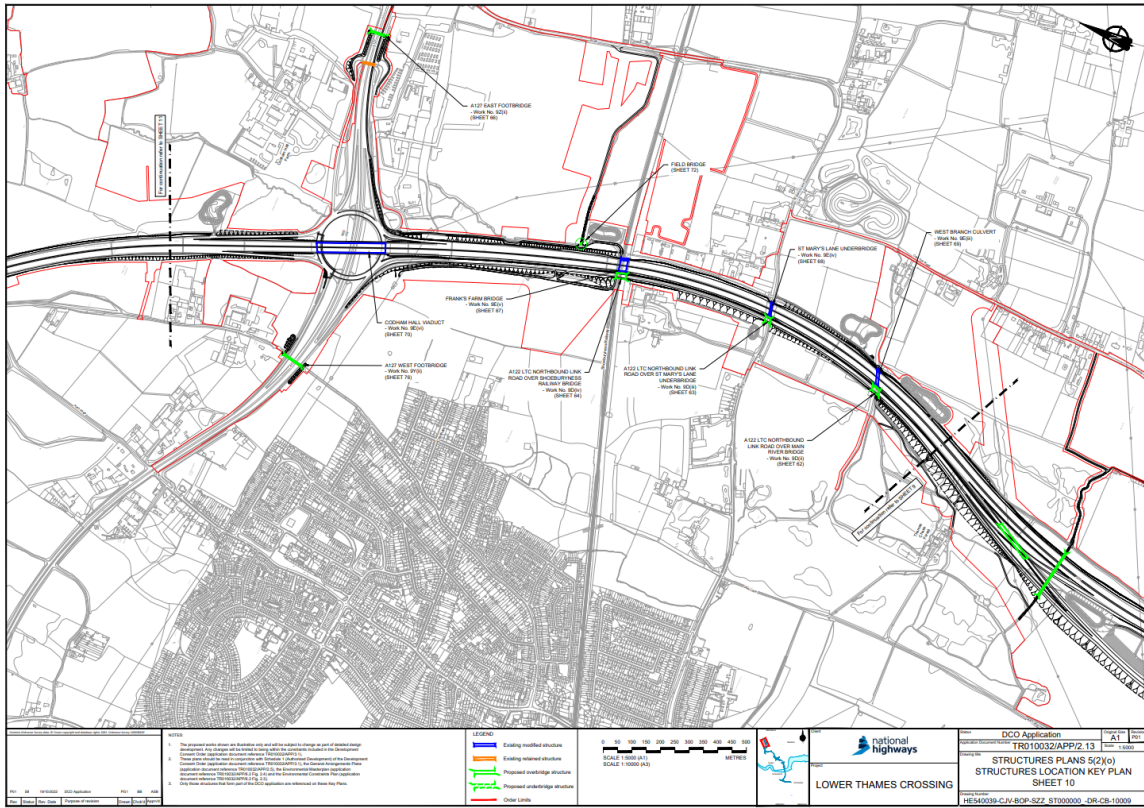
D. Works Plans Composite - Sheet 48 (M25 towards Nags Head Lane bridge)
 (Works Numbers: 9E)



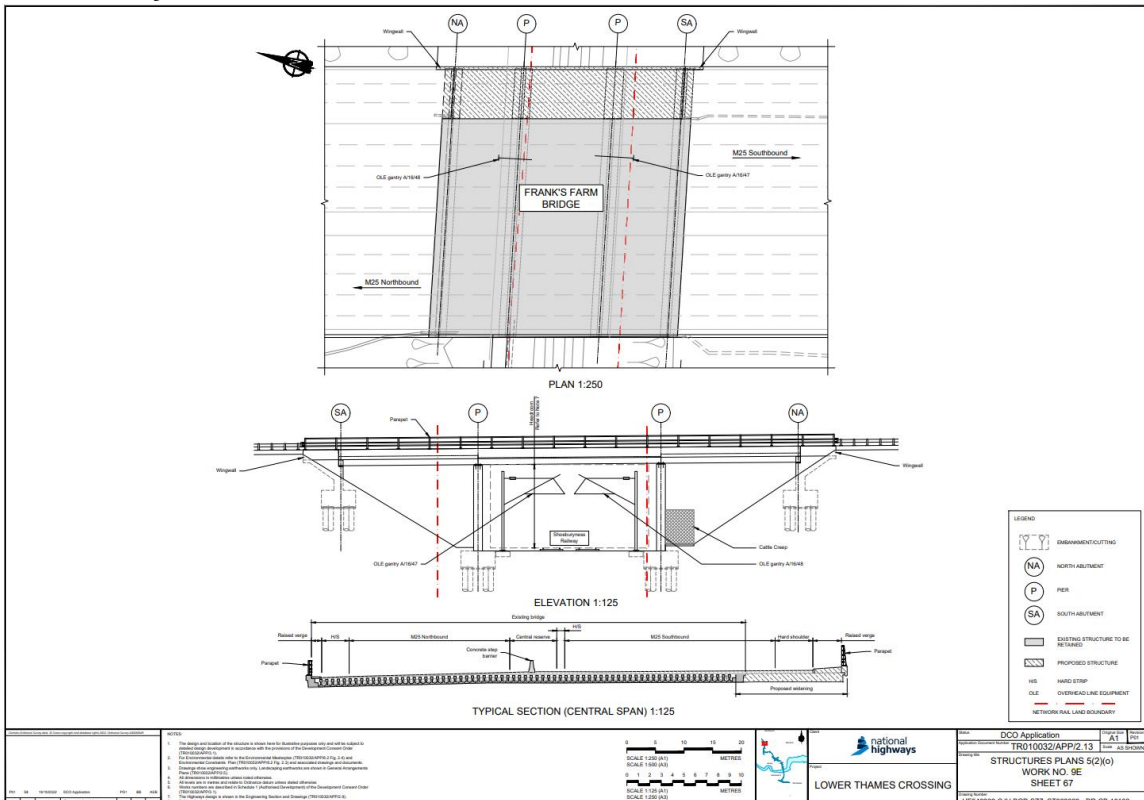
E. Works Plans Composite - Sheet 49 (M25 from Nags Head Lane to J28)
 (Works Numbers: 9E)

Appendix 4: Extracts of DCO Application Document 2.13 Structures Plans relevant to BBC administrative area (Ref: TR010032/APP/2.13)

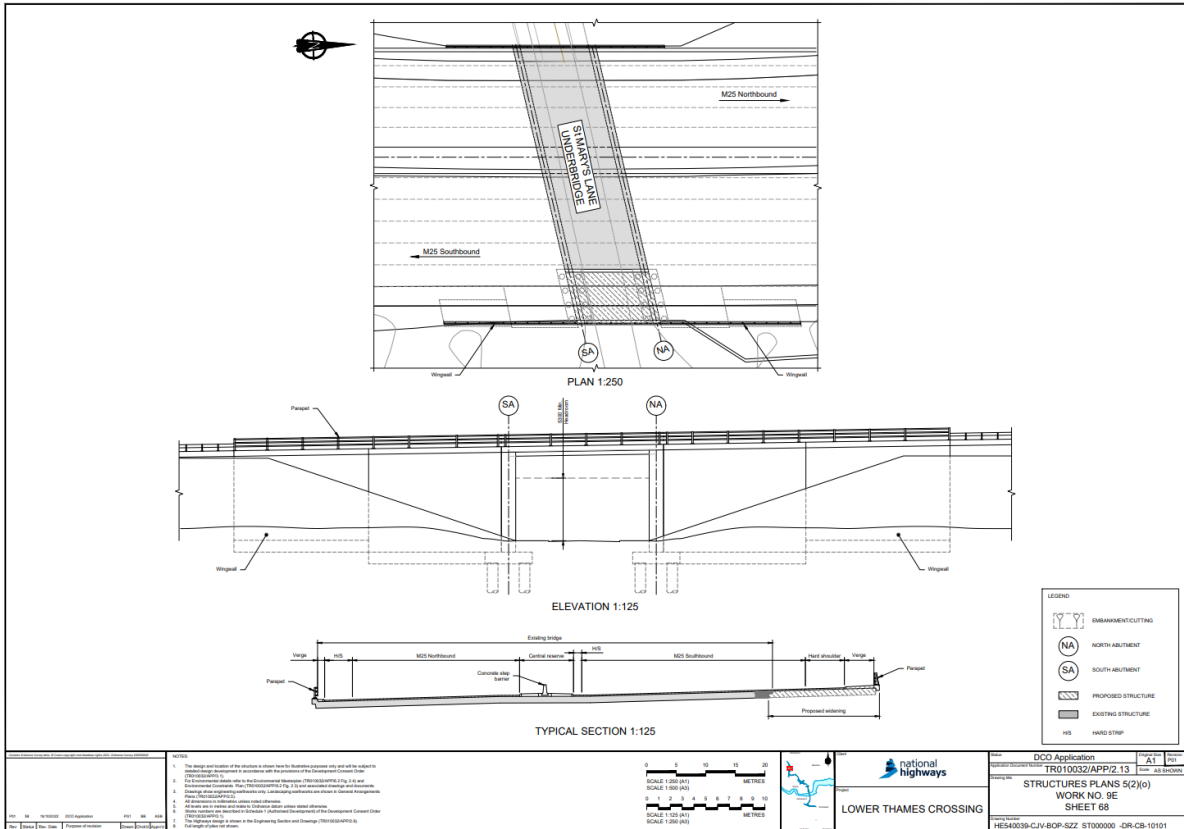
A. Structures Location Key Plan (Sheet 10)



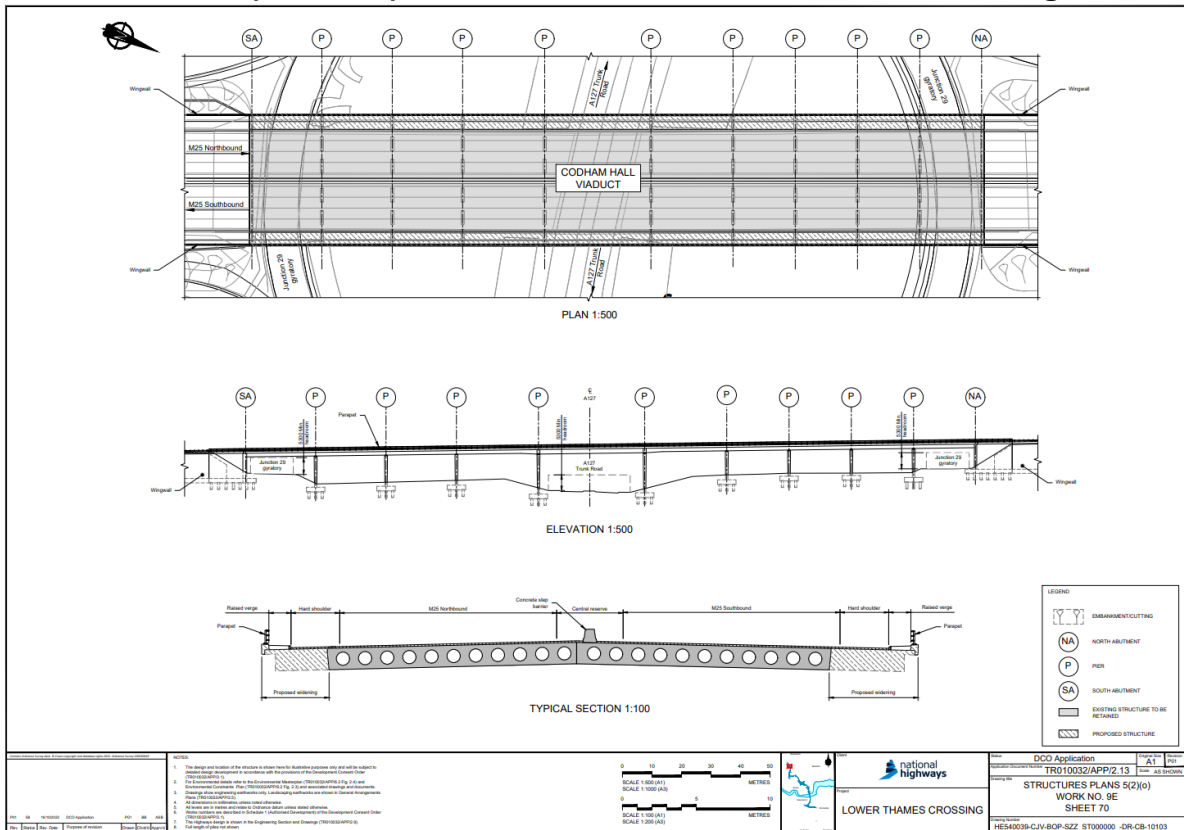
B. Work No. 9E (Sheet 67) M25 bridge extension over Shoeburyness Railway



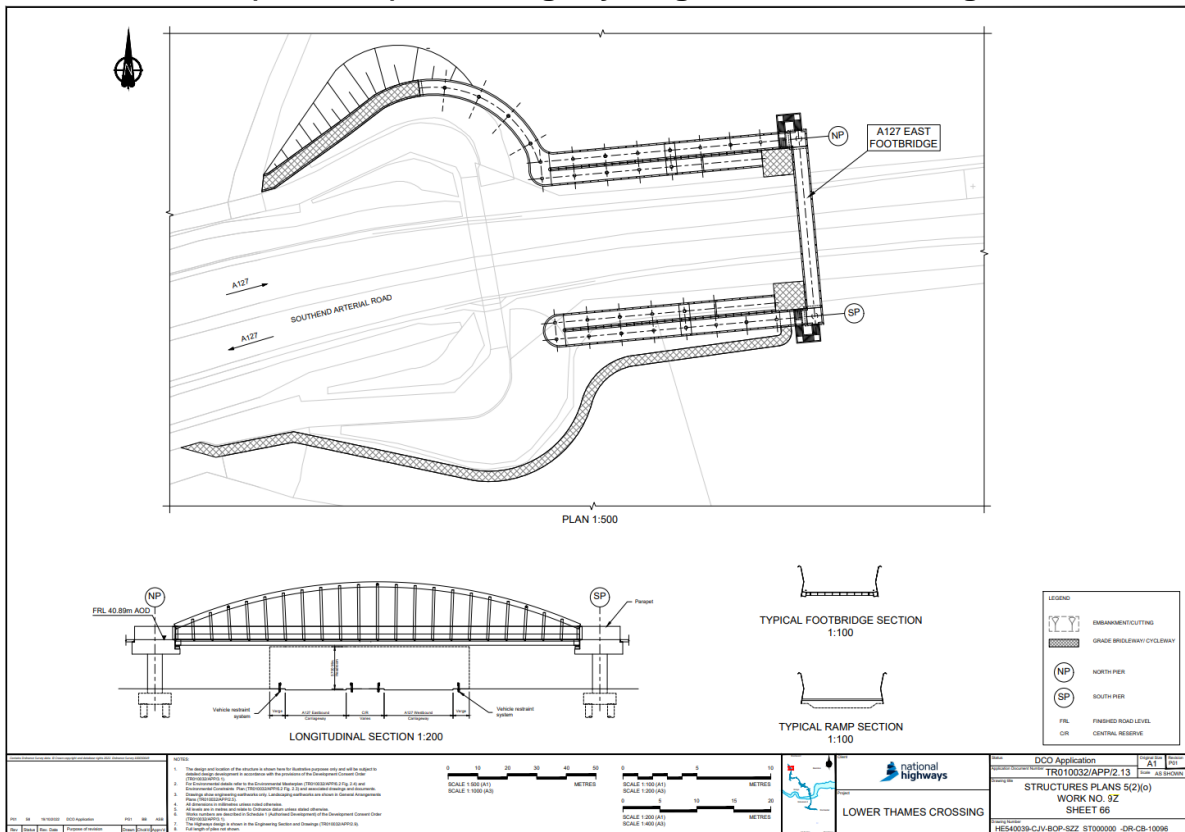
C. Work No. 9E (Sheet 68) – St Mary’s Lane underbridge extension



D. Work No. 9E (Sheet 70) – M25/A127 Codham Hall Viaduct widening



E. Work No. 9Z (Sheet 66) – Walking, Cycling, Horse Rider bridge over A127



Appendix 5: Extract of DCO Application Document 6.3 Environmental Statement Appendices, Appendix 2.1 Construction Supporting Information Indicative layouts of construction compounds relevant to BBC administrative area (Ref: TR010032/APP/6.3)

A. Work Number CA16 – Indicative layout for Warley Street compound

