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18.07.23

Dear Sir/Madam,

**PROPOSED LOWER THAMES CROSSING (YOUR REFERENCE: TR010032)
FOLKES FARM, UPMINSTER (INTERESTED PARTY UNIQUE REFERENCE: LTC-AP1668)**

On behalf of our client, Glenroy Estates Ltd ('GEL'), we hereby provide Written Representations, in advance of Deadline 1. GEL is an Interested Party, with the Applicant seeking to acquire its land under titles EGL521449, XX1566 and XX1564. GEL's land, for ease of reference, is land plan plots 45-56, 45-59, 45-61, and 46-27.

Reason for proposed acquisition

Document 4.1 'Statement of Reasons' lists the plots'¹ intended purpose as for *inter alia* "Implementation of environmental mitigation works to create a site for ancient woodland planting".

Document 2.6 'Works Plan – Sheet 46' identifies the site as being for "Ecological habitat creation and receptor site for protected species".

Document 6.1 'Environmental Statement Chapter 17 – Summary' (p48-49) states that the key mitigation strategy for ancient woodland habitat degradation, as a result of nitrogen deposition, is landscape-scale ancient woodland habitat creation across eight sites north and south of the River Thames, in order to offset the degradation. The site's designations, listed above, show that GEL's land is intended for this ancient woodland habitat creation scheme.

Objections

Our client objects to the proposed compulsory acquisition on the following grounds:

- 1) It is not necessary for National Highways to take ownership in order to retain and/or enhance the current use of the land as woodland.

¹ 46-27 (page 443), 45-56 (page 432), 45-59 (page 432) and 45-61 (page 432)

- 2) The sale of new petrol and diesel cars may be phased out in 2030, the earliest date that the Lower Thames Crossing will be open. As GEL's land is designated to mitigate habitat degradation from nitrogen deposition, the resultant reduction in currently predicted nitrogen deposition levels renders the proposed acquisition of GEL's land as unnecessary.
- 3) GEL believes that there are other publicly owned sites in the vicinity which could achieve the same ancient woodland creation goals, and that these sites should be fully investigated first.

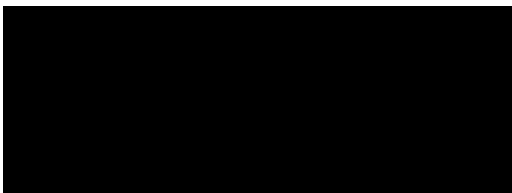
Suggested remedy

GEL suggests a s.253² agreement as a more appropriate arrangement, whereby it can retain the freehold and act as the contractor to maintain the woodland for the required future period until such time as nitrogen deposition has fallen to a suitably low level such that the mitigation is no longer required.

The above offer has been made to the Applicant, but rebuffed with only very limited explanation.

All parties will be aware that compulsory purchase is a 'last resort', and hence all other solutions ought to be fully exhausted first. This has not happened in this instance.

Yours sincerely,



Luke Raistrick MPlan MRTPI
Managing Director
Centro Planning Consultancy

² Highways Act 1980