

Lower Thames Crossing

9.54 Comments on LIRs

Appendix A – Brentwood Borough Council

Infrastructure Planning (Examination
Procedure) Rules 2010

Volume 9

DATE: August 2023
DEADLINE: 2

Planning Inspectorate Scheme Ref: TR010032
Examination Document Ref: TR010032/EXAM/9.54

VERSION: 1.0

Lower Thames Crossing

9.54 Comments on LIRs

Appendix A – Brentwood Borough Council

List of contents

	Page number
1 Applicant's Responses to Brentwood Borough Council's Local Impact Report...	1

List of tables

Page number

Table 1.1 The Applicant’s responses to Brentwood Borough Council’s Local Impact Report (LIR) – [REP1-220]	1
-----------------------------------------------------------------------------------------------------------------	---

1 Applicant's Responses to Brentwood Borough Council's Local Impact Report

Table 1.1 The Applicant's responses to Brentwood Borough Council's Local Impact Report (LIR) – [REP1-220]

LIR Reference	Local Impact Report Extract/ Applicant's Response
<p>Page 11 Paragraph 5.5-5.6</p>	<p>Local Planning Policy</p> <p>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.</p> <ul style="list-style-type: none"> • 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 <p>Other relevant adopted local planning policies and guidance include:</p> <ul style="list-style-type: none"> • 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)

LIR Reference	Local Impact Report Extract/ Applicant’s Response
<p>Applicant’s Response</p>	<p>Section 104(3) of the 2008 Planning Act requires the Secretary of State to decide a DCO application in accordance with any relevant National Policy Statement (NPS) other than where certain exceptions set out in subsections (4) to (8) apply. Section 104(2) states that in deciding an application, the Secretary of State (SoS) must have regard to:</p> <ol style="list-style-type: none"> a. Any relevant NPSs b. The appropriate marine policy documents (if any) c. Any Local Impact Report (LIR) submitted to the Secretary of State (SoS) d. Any matters prescribed in relation to development of the description to which the application relates e. Any other matters which the SoS thinks are both important and relevant to the SoS’s decision <p>Set in that context, the Applicant must demonstrate that the Project accords with NPS policy. However, local plan policy is capable of being an ‘important and relevant’ matter which the SoS may take into account. In Appendix A to the Planning Statement [APP-496], the National Policy Statement for National Networks (NPSNN) Accordance Table sets out how the Project accords with relevant NPS policy. Appendix C: Local Authority Policy Review of the Planning Statement [APP-498] provides an assessment of the Project’s alignment with relevant local policy.</p> <p>The assessment of relevant policy from the 2022 Brentwood Local Plan is presented in Table C.13 of Appendix C [APP-498] with assessments of relevant Essex County Council Minerals and Waste Plan policies being presented in Tables C.14 and C.15 respectively. Table C.13 of Appendix C [APP-498] provides a commentary in respect of all of the above-mentioned policies and documents with the exception of the following:</p> <ul style="list-style-type: none"> • MG05 – Developer Contributions • BE08 – Strategic Transport Infrastructure • E10 – Codham Hall Farm • PC01 – Safeguarding Employment Land • Developers Guide to Infrastructure Contributions • Sustainable Drainage Systems Design Guide for Essex <p>Policy MG05 requires all development to be supported by the infrastructure necessary to serve it, requires developers to work positively with the Council, sets out mechanisms by which such provision may be made if it is not provided directly and sets out exceptions to the policy. Policy BE08 sets out similar requirements specifically in relation to the Council securing financial contributions towards strategic transport infrastructure. MG05 and BE08 are not addressed as they apply to local development proposals which are subject to determination by Brentwood Borough Council. Nonetheless, the Applicant is bound by paragraphs 4.9 and 4.10 of the National Policy Statement for National Networks (NPSNN) which deal with planning obligations and Section 106 agreements and so cover the same matters as these two local plan policies. Section 106 Agreements: Heads</p>

LIR Reference	Local Impact Report Extract/ Applicant’s Response
	<p>of Terms [APP-505] and its accompanying Annex A together set out the Heads of Terms for the planning obligations that the Applicant considers to be appropriate in the context of the delivery of the Project.</p> <p>Policy E10 concerns a 9.6ha employment allocation to the north-east of junction 29 of the M25. This is not addressed in Appendix C as it is beyond the Order Limits and therefore not within the scope of the Project’s policy consideration.</p> <p>Policy PC01, which seeks to safeguard employment land from redevelopment for non-employment uses, is not addressed in Appendix C because the Project does involve the redevelopment of employment land in Brentwood Borough and so has no impact on safeguarded employment land in the borough.</p> <p>The Developers Guide to Infrastructure Contributions and the Sustainable Drainage Systems Design Guide for Essex are non-statutory county-wide documents and so no assessment is provided. However, a commentary is provided in respect of local plan policy BE05 (not listed above by Brentwood Borough Council) dealing with sustainable drainage.</p>
<p>Page 14 Paragraph 6.5</p>	<p>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.</p>
<p>Applicant’s Response</p>	<p>The access proposals from the B186 have been agreed in principle between the Applicant and St. Modwen, the promoter of Brentwood Enterprise Park (BEP). If BEP is developed before, or at a similar time to the proposed Project access, then the Project access design would be altered to connect to the BEP access. This is stated in the Design Principles [APP-516] (Design Principle S14.19).</p> <p>If the Project access is constructed before the BEP access, the Project access could be amended to connect to the new BEP access once built and the original Project access onto the B186 could then be closed to avoid too many junctions being located in close proximity to each other.</p> <p>A Land and Works Agreement between the Applicant, St. Modwen and the landowner (Mr. Padfield) to resolve project interfaces is being actively progressed.</p>
<p>Page 14 Paragraph 6.6</p>	<p>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</p>

LIR Reference	Local Impact Report Extract/ Applicant's Response
	<p>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.</p>
<p>Applicant's Response</p>	<p>This matter is addressed by Deadline 1 Submission - 5.4.4.2 Draft Agreed Statement of Common Ground between (1) National Highways and (2) Brentwood Borough Council [REP1-094] item 2.1.9. The Applicant acknowledges the updated comment and will provide a response in a future version of this SoCG.</p> <p>In addition, the Applicant has been engaging with the promoter of the Brentwood Enterprise Park (BEP), St. Modwen, and the landowner, Mr Padfield, for several years. The details of the interfaces between BEP and the Applicant are set out in Section 6.8 of Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes [APP-550].</p> <p>The Applicant and St. Modwen continue to work collaboratively to address the outstanding interfaces between the two projects. Should BEP obtain consent and be developed ahead of the Project, the proposed BEP vehicular bridge over the A127, combined with the existing structure, would provide equivalent Walker, Cyclist and Horse Rider (WCH) connectivity to that proposed by the Applicant. In this circumstance the Applicant would not construct the WCH structure to the east of M25 junction 29 (Work No 9Z) proposed in the draft DCO. This is stated in the Design Principles [APP-516], see Design Principle S14.22.</p> <p>The alternative circumstance is that the WCH structure to the east of M25 junction 29 proposed in the DCO is constructed prior to the development of BEP. The Applicant is continuing to engage with St. Modwen regarding potential design solutions which would accommodate the BEP access proposals in this scenario.</p> <p>In the event that the BEP proposal comes forward in place of the new WCH bridge for the Project, there would be no material loss as the enhanced A127 crossing proposed by the BEP application provides the same functionality as the new WCH bridge (Work No 9Z). The width of the existing bridge allows it to be retained as a bridleway because the line of travel is more than 2m from the parapet, as recommended by the British Horse Society Guidance. The feasibility of increasing the height of the bridge and infilling the parapets will be looked at by St. Modwen at the detailed design of BEP.</p> <p>A Land and Works Agreement between the Applicant, St. Modwen and the landowner (Mr. Padfield) to resolve project interfaces is being actively progressed.</p> <p>Please see the response to Page 14 Paragraph 6.5 above for a response to the B186 access aspect of Brentwood Borough Council's comment.</p>
<p>Pages 14 to 18 Paragraph 7.1 – 7.4</p>	<p><i>[The Applicant notes that Brentwood Borough Council provides information on local area characteristics such as landscape qualities and nature in Section 7 of the Local Impact Report. The Applicant has summarised this information as follows]:</i></p> <p>Summary of the LIR comments expressing possible concern about landscape and character impacts and on various named nature conservation sites in close proximity to the DCO order limits (but no specific harm identified or remediation / mitigation sought):</p>

LIR Reference	Local Impact Report Extract/ Applicant’s Response
	<p>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 Section 9 - Designated sites on pages 20-21 of the Brentwood Borough Council’s LIR provides further comment.</p>
<p>Applicant’s Response</p>	<p>The assessment of effects on landscape character reported in Environmental Statement (ES) Chapter 7: Landscape and Visual [APP-145] within the Brentwood area, has been based on Local Landscape Character Areas (LLCA) within the Land of the Fanns Landscape Character Assessment (The ‘Land of the Fanns’ Landscape Partnership Scheme, 2016) rather than the Mid-Essex Landscape Character Assessment 2006. This is explained in paragraph 7.3.63 of ES Chapter 7: Landscape and Visual [APP-145]. Within Brentwood District, the Project lies principally within the Brentwood Wooded Hills LLCA, with a small area to the south lying within the Thurrock Reclaimed Fen (sub area Mardyke) LLCA. The effects on landscape character are reported in ES Appendix 7.9: Schedule of Landscape Effects [APP-384].</p> <p>Effects on the non-statutory designated sites within the Project study area and as identified in Paragraph 7.1 of Brentwood Borough Council’s LIR are reported within ES Chapter 8: Terrestrial Biodiversity [APP-146]. The construction effects are presented in Table 8.33. Impacts from air quality, where applicable, to sites within 200m of the affected road network in accordance with DMRB LA 105, are presented in Table 8.38. Three of the sites: Hobbs Hole LWS/AW, Codham Hall Wood LWS/AW and Parkers Shaw LWS are within 200m of the ARN, but only Codham Hall Wood LWS/AW is identified as having a significant adverse effect from changes in nitrogen deposition during construction and operation of the Lower Thames Crossing. Compensation for these effects would be provided through the proposed nitrogen deposition planting at Hole Farm.</p>
<p>Page 19 Paragraph 8.3</p>	<p>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. <i>[Applicant’s Note – text appears thus in the Local Impact Report]</i></p>
<p>Applicant’s Response</p>	<p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks as set out in the Wider Network Impacts Management and Monitoring Plan (WNIMMP) [APP-545]. The WNIMMP provides information about the approach to traffic monitoring and the proposed monitoring locations. If the monitoring identifies issues or</p>

LIR Reference	Local Impact Report Extract/ Applicant's Response
	<p>opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes. The relevant stakeholders listed in Table 2.1 of the WNIMMP (which includes Brentwood Borough Council), would be consulted on the traffic impact monitoring, which amongst other discussions, would revisit the monitoring locations. The traffic impact monitoring scheme would begin at least one year before the Project opens. The traffic impact monitoring scheme is secured in Schedule 2 of the draft DCO [REP1-042] and would require approval by the Secretary of State.</p>
<p>Page 19 Paragraph 8.4</p>	<p>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.</p>
<p>Applicant's Response</p>	<p>The Lower Thames Area Model (LTAM) forecast demand has been developed in accordance with DfT's Transport Analysis Guidance (TAG) Unit M4 – Forecasting and Uncertainty. The Core scenario includes developments which were under construction or had planning applications or permissions as of 30 September 2021. The proposed BEP is not explicitly included in the Core scenario as it did not have a sufficient level of certainty at that time, but the Dunton Hills Garden Village is included. The LTAM demand is constrained to TEMPro 7.2 forecasts to ensure that overall growth is in line with Government projections. The demand development process is described in detail in Chapter 4 of the Combined Modelling and Appraisal Report (ComMA) Appendix C: Transport Forecasting Package [APP-522], and the full list of developments included is provided in Annex A in the ComMA Appendix C: Transport Forecasting Package Annexes [APP-523].</p> <p>A high growth scenario was also developed to understand the implications if travel demand exceeds central Government projections. The high growth scenario is detailed in Section 8.6 of the ComMA Appendix C: Transport Forecasting Package [APP-522].</p>
<p>Page 20 Paragraph 8.5</p>	<p>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.</p>
<p>Applicant's Response</p>	<p>This matter is addressed by the Statement of Common Ground (SoCG) [REP1-094] item 2.1.13 and 2.1.14 as follows: <i>'The Applicant welcomes [Brentwood Borough] Council's agreement as to the importance of the Code of Construction Practice (CoCP) [REP1-157]. It should also be noted that construction routes are now covered in the outline Traffic Management Plan</i></p>

LIR Reference	Local Impact Report Extract/ Applicant’s Response
	<p>for Construction (oTMPfC) [APP-547]. This will be the framework document for Contractors to develop Traffic Management Plans (TMPs), post DCO consent, in consultation with the relevant local authorities.’</p> <p>‘The Applicant has set out in the CoCP [REP1-157] and the oTMPfC [APP-547] how it will establish a range of groups and forums to communicate with local stakeholders and receive feedback on matters. For example, the Traffic Management Forum (TMF), active travel forum, and the Community Liaison Group.</p> <p>The monthly TMF committed to in the oTMPfC [APP-547], is designed to bring the Applicant, the Contractors and stakeholders together to discuss proposals, issues and performance of all things related to construction works and associated traffic management.</p> <p>At a meeting with Brentwood Borough Council on 10 August 2022, the Applicant detailed the processes above and the options for escalation. It was confirmed that Automatic Number Plate Recognition was an example of a tool to be used to monitor vehicles. Rules including [Project HGV] bans and their enforcement may be incorporated into TMPs and Materials Handling Plans developed post-consent through dialogue such as the TMF. These plans would become binding in line with the DCO provisions. Brentwood Borough Council welcomed the explanation and commitment to dialogue throughout the life of the Project.</p> <p>At a meeting on 22 May 2023, the Applicant set out its approach to HGV restrictions, which is set out in Table 4.4 of the oTMPfC and the impracticalities of implementing additional HGV restrictions to manage incidents. Rather, the Project would manage incidents as set out in Section 5.7 of the oTMPfC. The Applicant also proposed to establish two monitoring locations during the construction period: 1) at the north side of the A127/A128 roundabout to monitor traffic travelling north or south via Brentwood town centre including A128-Shenfield Rd (Wilson’s Corner), and 2) the junction of the A1023 and Mascalls Lane to monitor traffic travelling the western orbital route through Brentwood. At this meeting, Brentwood Borough Council indicated that the matter could be moved to agreed, but the Applicant is currently seeking further approvals including consultation with Essex County Council as the Highway Authority before moving the matter to Matter Agreed.’</p>
<p>Page 20 Paragraph 8.6</p>	<p>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.</p>
<p>Applicant’s Response</p>	<p>This matter is addressed by Deadline 1 Submission – 5.4.4.2 Draft Agreed Statement of Common Ground between (1) National Highways and (2) Brentwood Borough Council [REP1-094] item 2.1.13 as follows:</p> <p>‘The Applicant welcomes the [Brentwood Borough] Council’s agreement as to the importance of the CoCP [REP1-157]. It should also be noted that construction routes and monitoring requirements are covered in the oTMPfC [APP-547]. This will be the framework document for Contractors to develop TMPs, post DCO consent, in consultation with the relevant local</p>

LIR Reference	Local Impact Report Extract/ Applicant's Response
	<p><i>authorities. Further relevant details are addressed under item 2.1.14 below.</i></p> <p><i>At a follow-up meeting on 22 May 2023, the Applicant set out its approach to HGV restrictions and the impracticalities of implementing additional HGV restrictions to manage incidents. Rather, the Project would manage incidents as set out in Section 5.7 of the oTMPfC. The Applicant also proposed to establish two monitoring locations during the construction period: 1) at the north side of the A127/A128 roundabout to monitor traffic travelling north or south via Brentwood town centre including A128-Shenfield Rd (Wilson's Corner), and 2) the junction of the A1023 and Mascalls Lane to monitor traffic travelling the western orbital route through Brentwood. The Applicant is currently seeking further approvals including consultation with Essex County Council as the Highway Authority before moving the matter to Matter Agreed.'</i></p>
<p>Page 20 Paragraph 8.7</p>	<p>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.</p>
<p>Applicant's Response</p>	<p>This matter is addressed by Deadline 1 Submission – 5.4.4.2 Draft Agreed Statement of Common Ground between (1) National Highways and (2) Brentwood Borough Council [REP1-094] item 2.1.15 as follows:</p> <p><i>'The Framework Construction Travel Plan (FCTP) [APP-546] sets out that Site-Specific Travel Plans (for each compound or Utility Logistics Hub (ULH) or groups of compounds or ULH where they are closely located with similar levels of accessibility) will be produced and these would reflect the local environs at the time of production. The FCTP also sets out details of the Travel Plan Liaison Group (TPLG), which Brentwood Borough Council would be invited to, and this would offer an opportunity to raise such matters at the time.'</i></p> <p><i>'The FCTP requires the development of targets aligned with sustainable transport principles, which must be appropriate to the circumstances of each individual compound. These targets would be consulted with the TPLG and subject to their agreement. This is considered a sufficient mechanism to deliver the proposed emphasis on the use of public transport where it is readily available.'</i></p>
<p>Page 20 Paragraph 9.2 – 9.3</p>	<p>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.</p> <p>DCO Document 6.3 Environmental Statement, Appendix 5.6 Project Air Quality Plan [APP-350], 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.</p>
<p>Applicant's Response</p>	<p>The effects described within Brentwood Borough Council's Local Impact Report on the designated sites within the Brentwood Borough area during construction and operation are as stated in ES Chapter 8: Terrestrial Biodiversity [APP-146] section 8.6 and ES Appendix 8.14: Designated Sites Air Quality Assessment Part 1 [APP-403].</p>

LIR Reference	Local Impact Report Extract/ Applicant's Response
	The Applicant's approach to mitigation and compensation for the impacts of Nitrogen Deposition are presented in ES Appendix 5.6: Project Air Quality Action Plan [APP-350].
Page 20 Paragraph 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.
Applicant's Response	The Applicant's approach to mitigation and compensation for the impacts of Nitrogen Deposition are presented in ES Appendix 5.6: Project Air Quality Action Plan [APP-350].
Page 21 Paragraph 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.
Applicant's Response	The Applicant acknowledges the comments made in the Local Impact Report from Brentwood Borough Council.
Page 21 Paragraph 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.
Applicant's Response	The Applicant welcomes the comments made in the Local Impact Report from Brentwood Borough Council. Local planning authorities such as Brentwood Borough Council are noted as being part of the advisory group for the development of the Landscape and Ecology Management Plan in paragraph 4.1.13 of the Outline Landscape and Ecology Management Plan [REP1-173].
Page 21 Paragraph 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.
Applicant's Response	The Applicant welcomes the comments made in the Local Impact Report from Brentwood Borough Council.
Page 21 Paragraph 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

LIR Reference	Local Impact Report Extract/ Applicant's Response
	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.
Applicant's Response	The Applicant has been engaging with the promoter of the Brentwood Enterprise Park (BEP), St. Modwen, and the landowner, Mr. Padfield, for several years. The details of the interfaces between BEP and the Applicant are set out in Section 6.8 of Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes [APP-550]. The Applicant and the promoter continue to work collaboratively to address the outstanding interfaces between the two projects. In addition, the Applicant continues to engage with Brentwood Borough Council as the Local Planning Authority and Essex County Council as the Local Highway authority to ensure that BEP and the Project can progress.
Page 22 Paragraphs 11.2 to 11.4	<p>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.</p> <p>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.</p> <p>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.</p>
Applicant's Response	It is noted that in broad terms the landscape and visual impact assessment in ES Chapter 7: Landscape and Visual [APP-145] is considered to be appropriate.
Page 22 Paragraph 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.
Applicant's Response	The Applicant welcomes the comments made in the Local Impact Report from Brentwood Borough Council. Please see the Applicant's response to Page 21 Paragraph 9.6 above.

LIR Reference	Local Impact Report Extract/ Applicant's Response
Page 22 Paragraph 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.
Applicant's Response	The Applicant acknowledges the comments made in the Local Impact Report from Brentwood Borough Council.
Page 22 Paragraph 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.
Applicant's Response	The air quality assessment is presented within ES Chapter 5: Air Quality [APP-143] and has concluded that there are no significant effects on human health receptors. The assessment has concluded that for some designated habitats for ecology, the impacts of the Project are significant. Proposed mitigation and compensation measures to reduce the impacts of nitrogen deposition are presented in the ES Appendix 5.6: Project Air Quality Action Plan [APP-350] in accordance with the Design Manual for Roads and Bridges LA 105.
Page 23 Paragraph 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.
Applicant's Response	The Applicant notes the comments made in the Local Impact Report from Brentwood Borough Council, and acknowledges that the text represents a summary of the findings of ES Chapter 12: Noise and Vibration [APP-150] .

If you need help accessing this or any other National Highways information, please call **0300 123 5000** and we will help you.

© Crown copyright 2023.

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence:

visit www.nationalarchives.gov.uk/doc/open-government-licence/

write to the **Information Policy Team, The National Archives, Kew, London TW9 4DU**, or email psi@nationalarchives.gsi.gov.uk.

Mapping (where present): © Crown copyright and database rights 2023 OS 100030649. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.

If you have any enquiries about this publication email info@nationalhighways.co.uk or call **0300 123 5000***.

*Calls to 03 numbers cost no more than a national rate call to an 01 or 02 number and must count towards any inclusive minutes in the same way as 01 and 02 calls.

These rules apply to calls from any type of line including mobile, BT, other fixed line or payphone. Calls may be recorded or monitored.

Printed on paper from well-managed forests and other controlled sources when issued directly by National Highways.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

National Highways Limited registered in England and Wales number 09346363