

# Lower Thames Crossing

## 9.220 Chelmsford Diocesan Board of Finance (CDBF) position statement

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# 1 Introduction

- 1.1.1 The Chelmsford Diocesan Board of Finance (CDBF) has requested that a joint position statement be submitted to the Examining Authority in relation to their land interests.
- 1.1.2 The Applicant responded to CDBF’s Written Representation (WR) [\[REP1-418\]](#) in Comments on WRs Appendix F: Landowners [\[REP2-051\]](#). The Applicant’s response on matters addressed in that document remains unchanged.

## 1.2 Final positions

- 1.2.1 CDBF own land to the west of North Road which is outside of the Project’s Order Limits but part of a wider area of land that is subject to an Option with Bellway Homes Limited. Parts of this Option land are within the Order Limits. The final position in relation to this land is outlined in Table 1.1.
- 1.2.2 CDBF also own land to the south of Ockendon Road, known as North Ockendon Glebe. The final position in relation to this land is outlined in Table 1.2.

**Table 1.1 Final positions regarding CDBF land subject to the Bellway option to the west of North Road (outside of the Order Limits)**

Item	The Applicant’s position	CDBF’s position
<b>Noise</b>	<p>The proposed earthwork bund introduced at Local Refinement Consultation in 2022 would provide additional screening to the surrounding area, reducing the predicted increase in noise compared to the previous proposals. The opening year noise change contour (see Environmental Statement (ES) Figure 12.7: Opening Year Noise Change Contour (DSOY minus DMOY) <a href="#">[APP-315]</a>) shows the predicted change in noise levels. The ES Figure 12.6: Operational Road Traffic Noise Mitigation <a href="#">[APP-314]</a> (sheet 4) presents the embedded earthworks noise mitigation considered in the noise model and the low noise road surfacing proposed.</p> <p>There are no acoustic barriers proposed in this section of the new road; several barrier options were considered in ES Appendix 12.10: Road Traffic Noise Mitigation and Cost Benefit Analysis <a href="#">[APP-450]</a> (see Options 16, 17, 18 and 19) but were not appropriate due to landscape and</p>	<p>The CDBF share Bellway Homes’ concerns over the effects of the noise associated with the operational stage of the LTC upon the CDBF’s land that is under option to Bellway Homes.</p> <p>This, if unmitigated, will potentially limit and constrain the extent of residential development in some areas (principally concerning the northern part of the Option land) and increase construction costs associated with the need to mitigate the noise levels. National Highways has responded to Bellway Homes on this point. However, this remains as a concern to the CDBF. Additional mitigation in the form of acoustic barriers has been discounted by National Highways as being unnecessary in this area.</p> <p>The CDBF needs to be satisfied that sufficient noise mitigation will be delivered, in order to prevent the LTC from prejudicing Thurrock Council’s proposed housing allocations, specifically in relation to the CDBF land that is under option to Bellway Homes, as contained in the recently published Regulation 18 consultation draft Local</p>

Item	The Applicant's position	CDBF's position
	<p>visual, and cultural heritage constraints.</p> <p>The Bellway option land is not considered in the ES Chapter 12: Noise and Vibration [APP-150] as assessments have been made to the nearest existing receptors, hence why Barrier Option 19 was scoped out of the ES Appendix 12.10: Road Traffic Noise Mitigation and Cost Benefit Analysis [APP-450]. The development was considered in ES Appendix 16.2: Short List of Developments [APP-484], pages 123–125; however, no detailed information was available on the proposed development at the time of the Development Consent Order (DCO) submission and the development had no planning status, therefore it was not possible to draw any firm conclusions.</p> <p>The Bellway development currently still has no planning application or formal allocation in any adopted Local Plan. The Applicant is proposing all reasonable and cost-effective steps to mitigate the noise impacts of the new road in this section.</p> <p>Given the current planning status of the proposed Bellway development there is insufficient certainty to progress a Land and Works Agreement. The Applicant will continue to engage with CDBF and Bellway Homes regarding design interfaces between the Project and the proposed development.</p>	<p>Plan, which will be subject to public consultation in December 2023-February 2024,</p> <p>The CDBF would welcome further assurances from National Highways to ensure that Bellway Homes can be satisfied that the noise impacts associated with the operational stage of the LTC will not impact upon the development of this land and understand that National Highways will consider providing additional noise mitigation should Bellway Homes' proposed residential development scheme continue to advance and become more certain in the time up to the start of construction of the LTC.</p> <p>As the CDBF land that is under option to Bellway Homes is now being proposed as a site to be allocated for housing and associated uses in Thurrock Council's draft Local Plan, this demonstrates that Bellway's proposed residential development scheme is becoming ever more certain. The CDBF therefore requests that National Highways proposes additional noise mitigation for consideration by the CDBF and Bellway Homes, in order to address the continuing concerns that are set out above.</p> <p>On this point Bellway requests that a Land Works Agreement be made between the CDBF, Bellway Homes and National Highways with a view to ensuring that both schemes can progress with as little negative impact upon the other as possible.</p>
<b>Drainage</b>	<p>Regarding the drainage of the option land area to the north of the Project and to the west of North Road, the 'northern parcel', the Drainage Plans (Volume C) [Document Reference 2.16 Volume C (5)] (Sheet 42) outlines the drainage proposed in this area where a new culvert is proposed, Work No. 9W (see the draft DCO [Document Reference 3.1 (11)]), to provide appropriate drainage.</p>	<p>The LTC, as it is currently proposed, will sever the existing watercourse drainage that serves the northern parcel of land that is under option to Bellway Homes. This currently drains via a number of ditches and drains in a southerly direction under the proposed LTC. Therefore, to prevent the northern parcel being completely sterilised, suitable surface water and foul drainage must be provided by National</p>

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	<p>Further engagement with the landowner in relation to this element of the works is ongoing and detailed issues would be considered by the Contractors in due course.</p> <p>There is no foul water network along this section of North Road; it would be for a future development to undertake works to connect to a foul water network.</p> <p>The Applicant, via engagement with both Anglian Water and Thames Water understands that there is no existing foul water network located within North Road at the point the A122 intersects. As such no provisions for foul water diversions have been made. The Applicant does not believe its own proposals would preclude the installation of a suitable network to be developed and installed as part of a future Bellway development. If Bellway design their foul and storm water networks and notify the Applicant in advance of the A122 and North Road works commencing, the projects could collaboratively work together to undertake those interfacing works.</p> <p>The Applicant notes that the northern parcel was not included in the Regulation 18 Local Plan Initial Proposals Consultation or alternative option published by Thurrock Council on 30 November 2023 and heard at an Emergency Full Council Meeting on 6 December 2023.</p> <p>Appropriate replacement field drainage will be installed to ensure retained land would benefit from equivalent provision of drainage to existing.</p> <p>It would be for Bellway to develop proposals for surface and foul water drainage of any proposed</p>	<p>Highways to ensure that its existing uses can continue and to allow for its future development.</p> <p>Also, appropriate legal rights must be granted over any land that is to be transferred to National Highways to facilitate this drainage and to ensure its ongoing maintenance. The CDBF requests that National Highways provides an assurance that they will provide the landowners within the areas of land that are under option to Bellway Homes with the necessary legal rights for the drainage works and long-term maintenance that will be required.</p> <p>National Highways has since confirmed their intention for the ditch alongside the LTC to take surface water flows from the northern parcel of the site and that further engagement with the landowner is expected to occur. However, the CDBF and Bellway Homes remain concerned that the discharge rate of the existing land may not have been taken into account within the design of the drainage ditch. Therefore, confirmation is required that the ditch will be able to take the predicted flows and allow for drainage from the northern parcel of land, and that suitable conduits will be provided under the LTC to allow for both surface and foul water flows in the future as there are believed to be no suitable alternative surface water discharge points or foul sewer networks north of the proposed LTC route in this area.</p> <p>The CDBF does welcome National Highways' confirmation that they will work collaboratively with Bellway Homes in relation to any interface between the two projects and Bellway will develop proposals for surface and foul water drainage for the proposed development of their</p>

Item	The Applicant's position	CDBF's position
	development of the site. The Applicant would work with Bellway collaboratively in relation to any interface between the two projects.	Option site in due course, which will be shared with National Highways to enable this collaboration to take place.
<p><b>New route for walkers cyclists and horse riders (WCH)</b></p>	<p>The proposed WCH route to the east of North Road is located on land not owned by CDBF and not subject to the Bellway option. However, the Applicant is aware of development proposals promoted on that land by others and of the design interface between the two proposals.</p> <p>The Applicant has offered a WCH dedication agreement to the affected landowner and will work with all parties to avoid any issues with ownership of such routes impacting on future development proposals.</p>	<p>As noted above, Thurrock Council proposes to allocate the land that is under option to Bellway Homes for residential development and associated uses in its Regulation 18 draft Local Plan. The CDBF therefore continues to object to National Highways' proposed permanent acquisition of land to deliver a Public Right of Way (PROW) between the LTC and the northern edge of the existing built-up area of South Ockendon, as they do not believe it is necessary and it could prevent or constrain the delivery of housing on the land owned by the CDBF that is under option to Bellway Homes as well as on the land promoted by EASL which is proposed as a reasonable alternative site for housing by Thurrock Council.</p> <p>To summarise, the proposed PROW would prejudice the construction of the new roundabout that is proposed to be constructed on North Road to serve significant housing-led developments on land to the west and east of North Road.</p> <p>If the PROW is to be approved and the land for the PROW has to be compulsorily acquired by National Highways, appropriate legal rights must be granted to the landowners for them to divert the PROW and to construct the proposed new roundabout and associated infrastructure that is needed to serve these developments, and to maintain, transfer and dedicate the Roundabout and diverted PROW to the Highway Authority.</p> <p>In this regard, the CDBF and Bellway Homes welcome National</p>



Item	The Applicant's position	CDBF's position
		<p>Highways' offer of a voluntary agreement with landowners to ensure that these future developments are not prejudiced. However, it is critical that this is secured by agreed Statements of Common Ground well in advance of Planning Permission being granted for the LTC.</p>
<p><b>Barking Power Limited gas pipeline</b></p>	<p>The Applicant understands that the section of gas pipeline in this section of the Project has been filled with grout this summer. There has been no official notice yet that the pipeline has been fully decommissioned. The Applicant will liaise with Bellway when this notification has been received.</p>	<p>The CDBF understands from National Highways that Barking Power Limited (BPL) expected to grout fill and complete the abandonment of BPL Gas Pipeline themselves in Summer 2023 but that it has not yet officially been decommissioned. We also understand that National Highways proposed to cap the gas pipeline at the locations within the order limits and to remove it. The CDBF would be grateful for a progress update on these matters from National Highways as soon as possible.</p> <p>The CDBF also request that any diverted Gas Pipeline is provided with upgraded encasing so that consultation zones can be minimised to allow for the most efficient use of potential development land within its ownership. Confirmation on this from National Highways would be much appreciated.</p>



**Table 1.2 Final Positions regarding land south of Ockendon Road  
(North Ockendon Glebe)**

<b>Item</b>	<b>The Applicant's position</b>	<b>CDBF's position</b>
Land required	The CDBF land at North Ockendon Glebe is required partially for permanent acquisition for Works Nos. 9B and 9N (plot 42-11) and for both temporary possession (plot 42-116) and for temporary possession with the permanent acquisition of rights for Work Nos. MU74 and MU76 (plot 42-115).	The CDBF accepts the Applicant's position.
Access during construction	During the proposed closure of Ockendon Road bridge access to the land would be afforded at all times, except when the land is occupied temporarily by the Applicant to undertake the works, from the east via North Road or Clay Tye Road.	The CDBF accepts the Applicant's position.
Access post construction	Access to the field will be retained in its current location.	The CDBF accepts the Applicant's position.

## Glossary

Term	Abbreviation	Explanation
<b>Barking Power Limited</b>	<b>BPL</b>	n/a
<b>Chelmsford Diocesan Board of Finance</b>	<b>CDBF</b>	n/a

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