

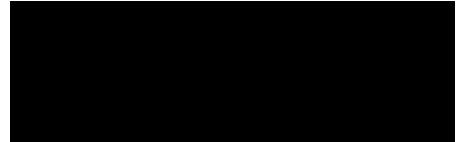


Pinsent Masons

BY E-MAIL

Lower Thames Crossing Case Team  
[LowerThamesCrossing@planninginspectorate.gov.uk](mailto:LowerThamesCrossing@planninginspectorate.gov.uk)

Your Ref TR010032  
Our Ref: 153106210.1\652663.07023



12 December 2024

Dear Lower Thames Crossing Case Team

**LOWER THAMES CROSSING – APPLICATION FOR DEVELOPMENT CONSENT  
RESPONSE FROM ST. MODWEN DEVELOPMENTS LIMITED (REFERENCE 20035817) TO  
NATIONAL HIGHWAYS' LETTER OF 26 NOVEMBER 2024**

We continue to act for St. Modwen Developments Limited (“**SMDL**”) in respect of the impact of the proposed Lower Thames Crossing (“**LTC**”) on SMDL’s proposed Brentwood Enterprise Park (“**BEP**”) development in the vicinity of Junction 29 of the M25.

We note National Highways’ response dated 26 November 2024 to a letter from the Secretary of State dated 12 November 2024 which requested, amongst other things, “*an update on any other side agreements that currently remain outstanding*”. National Highways’ response sets out at Annex C an update on various outstanding side agreements.

However, we note that Annex C does not include any update regarding the agreement being negotiated between SMDL, National Highways, and the landowner in order to regulate the relationship between the LTC and the BEP. By way of update, the agreement is largely in agreed form but has not yet been issued for signing pending agreement from National Highways that it is willing to cover the landowner’s legal fees associated with the agreement.

We do not propose to repeat the details of SMDL’s objection to LTC in the event that an agreement is not entered into (all of which remain applicable and which must be taken into account by the Secretary of State), save to reiterate that without the provisions of such an agreement LTC will have a significant adverse impact on SMDL’s ability to deliver BEP.

Yours faithfully



**Pinsent Masons LLP**

Pinsent Masons LLP

30 Crown Place Earl Street London EC2A 4ES



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