

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

Date: 13 December 2024

Our ref: 5763\503602528.1\211281.00001

Your ref:

Dear Lower Thames Crossing Team

**LOWER THAMES CROSSING – APPLICATION FOR DEVELOPMENT CONSENT RESPONSE (REFERENCES: 20035860; 20035861 and 20035864) TO NATIONAL HIGHWAYS’ LETTER OF 26 NOVEMBER 2024**

We act on behalf of **CS PADFIELD, S&J PADFIELD PARTNERS LLP AND S&J PADFIELD ESTATES LLP** and have submitted representations to Lower Thames Crossing (LTC) both:

1. On behalf of our clients as landowners with existing interests, uses and occupiers that would be affected by the LTC proposal; and
2. in connection with the effect of the LTC proposal in bringing forward the Brentwood Enterprise Park (BEP).

We regard to the latter we have been negotiating a Land and Works Agreement alongside Pinsents acting on behalf of St Modwen to regulate the relationship between BEP and LTC. The BEP Land and Works 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 landowners’ legal fees associated with the time spent in negotiating that agreement.

With regard to the former there has been very little achieved in negotiating the terms of an agreement that would achieve any withdrawal of our objections on the closure of the J29 and its impact on the use and occupation of the land.

In the event that an agreement is not finalised in either case our objections will remain and must be taken into account by the Secretary of State in the determination of the LTC proposal.

Yours faithfully

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