



## M25 North East Residents' Association



# Why Brentwood should refuse the Moto application

## PART ONE – THE HEADLINES

The Council has re-consulted on the Moto application (24/00874) submitted in July 2024  
These are the key objections raised consistently by our 400 members over the last two years

It is time for this application to be decided

### Our objections

Three themes provide clear and independent reasons for refusal

#### Green Belt

2 million square feet of urban development in the narrowest part of the Green Belt is unacceptable

#### Unsustainable location

The jobs are inaccessible and travelling to work via the M25 implausible

#### Fundamental procedural flaws

Brentwood is asked to approve the access, but the works are left out of the application. As a result, they are not properly assessed, Havering is excluded, and the access is not agreed with National Highways.

This is **Part One** where we explain our headline case

In **Part Two** we set out the full detail



## GREEN BELT

2 million square feet of urban development in the narrowest part of the Green Belt is unacceptable



### What should happen

- The Green Belt should preserve the strategic countryside gaps between towns

### What's wrong

- Huge urban footprint concentrated in the narrowest part of the gap
- Extends a finger of development, releases urban sprawl, and cannot be Grey Belt
- Undermines the separation between Havering and Brentwood

### Why this matters

There is a fundamental conflict with the purposes of the Green Belt here. We would lose countryside close to Havering, rejuvenate the eastward spread of London and erode the separate identity of Brentwood as a town.

## UNSUSTAINABLE LOCATION

The jobs are inaccessible and travelling to work via the M25 implausible



### What should happen

- All new employment development should be in places that you can get to on foot, bike, or public transport

### What's wrong

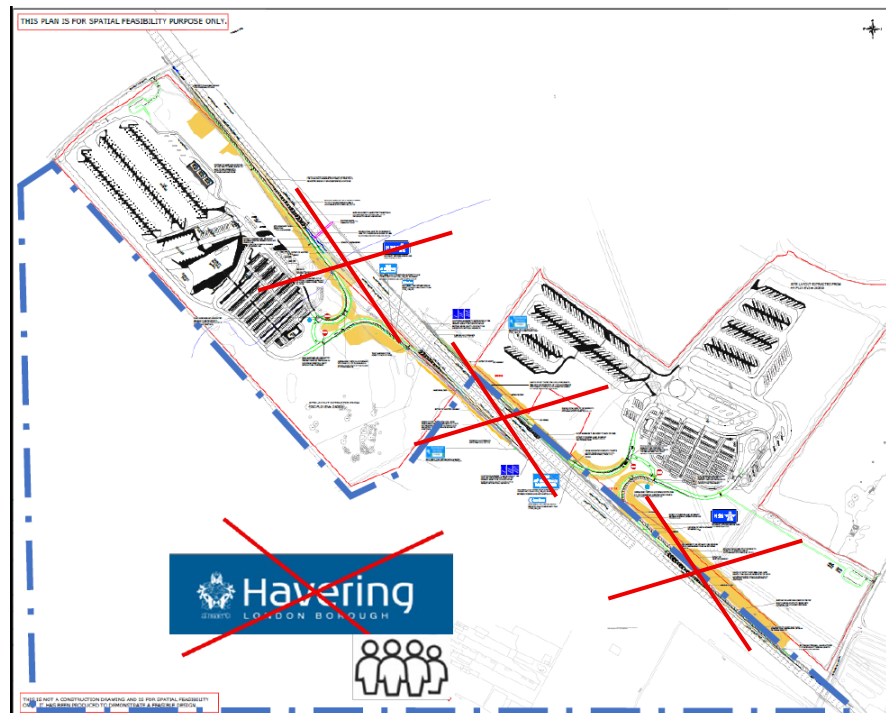
- Moto admits you can't get there to work by walking, cycling and public transport
- 75% of staff will need to use a car
- Moto say staff will need to use the M25 which is at least a 27 mile journey
- Getting to work doesn't work

### Why this matters

- This is the wrong site
- It is completely contrary to highway and land use planning policy for new employment
- It is unsustainable and would not function as suggested

## Fundamental procedural flaws

Brentwood is asked to approve the access, but the works are left out of the application. As a result, they are not properly assessed, Havering is excluded, and the access is not agreed with National Highways.



### What should happen

- If access is to be decided by Brentwood it should be in the planning application
- The motorway access must be assessed in the Environmental Statement
- Havering should be involved in deciding development proposed in its jurisdiction

### What's wrong

- Motorway works are outside the planning application
- Havering is left out
- The Environmental Statement does not assess the access motorway works despite being asked to do so by National Highways beforehand
- Motorway works should be agreed before submission, not designed afterwards
- The slip roads do not fit safely between the bridges

### Why this matters

- The application is so flawed it cannot be approved
- All the environmental effects are not properly assessed
- The Highway Authorities' powers to undertake the works would risk challenge

## In a nutshell

This application fails on every level

It causes clear harm to the Green Belt and undermines the strategic gap

It proposes jobs in a location that is inherently unsustainable and unlikely to function in practice

And it cannot be properly approved because the motorway access is not properly included or assessed

M25 (Northeast) Residents Association

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