

THAMES CROSSING ACTION GROUP

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Reference: 21/01883/FUL

Address: Coach Park Pilgrims Lane, North Stifford, Grays, Essex RM16 5UZ

Proposal: Retrospective Planning Application for a Temporary Programme Management Office Facility and Contractors Compound with Related Staff Welfare Facilities for a period of five years

Case Officer: Ian Harrison

Reason for additional comments

Thames Crossing Action Group submitted an official response to Thurrock Council planning dept on 4th January 2022. At the time of submitting, at least 9 of the supporting documents had been uploaded to the planning portal with an inaccessible file format.

When submitting our response we requested to reserve our rights to comment further once the supporting documents that had been inaccessible on the planning portal were released in an accessible file format. Please note that this response is in addition to our previous submission and does not supersede it, both documents form our response on this planning application.

Additional comments

We again question the adequacy of the documentation, as we note numerous errors, and question what other information could be incorrect that may not initially be apparent if there are so many obvious errors.

Pilgrims Lane Travel Plan

This document again states that the area south of the site "*is mainly commercial, with warehouses and a Sainsburys supermarket*" (section 2.1.2) We are still not sure where all the warehouses that are mentioned are in reality. We also question whether those preparing the travel plan are actually familiar with the area in question, and how they seem to miss the fact that is actually a large residential area there.

Section 2.1.4 states site shown in Plate 3.1 but the plate is labelled 2.1

Section 2.2 we note that the applicant fails to give clarity in this report that the existing use is without planning permission and has been since current operation began in Nov 2019.

Section 2.4.1 states site layout in Plate 3.2 but the plate is labelled 2.2

Section 2.4.4 it states "*...and whilst National Highways prepare for construction*" Does this mean they plan on using the site as a compound for construction use whilst the main compounds are being set up, if they get a DCO?

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Section 2.4.5 states the compound would be used for 4 years before progressively being moved to a main compound (if they are granted a DCO). 4 years from when they started using the site in Nov 2019 would be Nov 2023. Since we now have another consultation and the DCO application will not be able to be resubmitted until later in 2022, and the process takes an average of 18 months at least with many road project DCO decisions recently being delayed considerably, these timings seem questionable. We again question whether the timings in the retrospective application start from when they started using the site, as we believe it should, or whether they plan on starting to count the time frames once they get planning permission, if it is granted?

Section 2.4.6 states *"It should be noted that while the site is proposed with regards to works associated with the Project, it would not be used as a construction compound, rather a "contractors" and National Highways compound"* However, there are references to access/works to construction sites within the application documentation. Which, should be believed? Questions need to be asked as there is no consistency to the information provided.

We find further discrepancy in Sections 2.4.7 and 2.4.8 whereby the first states the offices could accommodate a maximum of 200 workers, yet by the second it states hot desk spaces for 126. Are we expected to believe that the difference of 74 workers would be in 'a welfare office, a community engagement office, an induction room, operational nurse area, meeting rooms and collaboration space, an incident management room and 2 security cabins'? Again numbers do not add up and info is not clear and informative.

Existing transport conditions – we note that they state that the roundabout to the south of the site via the B186 is signalised, whilst the lights are in place they have not been in use for years. The plate quoted also appears to be incorrect, again. The plates for the bus and rail services are also both wrongly labelled. We draw attention to the fact it is stated that Chafford Hundred railway station is within walking/cycling distance, yet then goes on to state that a Mini bus shuttle would be used to transport staff to and from the railway station. Why is a mini bus shuttle needed if it is being sold as a walkable distance?

Trip assessment – Again table 6.1/5.1 is wrongly labelled. We also question again how 12 +10 can equal 23 in the am peak in this table.

Section 5.2.2 – We again question how the site could be running at 100% capacity in Oct since it is also stated in application documents, that the site is not yet at 100% capacity. Had the offices all been installed by this time for example? If not and the site is supposed to be running at 100% why would more office space be needed, or are we supposed to believe that staff have been sitting working in their cars or something? There is no clear indication as to what they deem 100% to be either, if it is what the site can accommodate or if it was based on their estimate that it would likely be less than the amount the site could accommodate. This again is misleading and contradictory info.

Why was the breakdown of category of the vehicle type not shown in the table?

Why does Section 5.2.5 state *"Based on 25 percent of these being HGVs"* if this was a CCTV survey then surely the figures should be exact and not estimates of percentages.

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Why does the table show a 12 hour period weekdays, when it is detailed elsewhere in the documentation that there would be some night shifts, and we also know there are weekend movements too at times. We do not feel this survey is a true reflection on traffic movements for the site.

Section 5.2.8 – we again point out that traffic lights at the entrance will not help as the entrance security gates/barriers do not lay far enough off the road/roundabout.

Trip distribution – We question how if the traffic surveys for the site were carried out in Oct 2021, and the distribution data was collected in March – June 2021 this can give a realistic indication as to traffic levels and routes/distribution? Presumably it would be different staff visiting the site once fully operational than were surveyed for locations in March-June. The information provided is again not clear or informative.

Staff postcodes plate is also wrongly labelled.

We also seriously question how the majority of the staff postcode locations are to the west and south do the figures in the traffic assessment appear to show more traffic coming to the site from the east? We do not consider this to be a very clear or informative representation of info, there is no indication as to how many staff in each area there are.

Plus it states that “*Staff postcode data was also provided, which has been mapped as shown in Plate 6.1, for areas with four or more respondents located in each area.*” Also, for example, would there really be 4 or more people in the Southampton/New Forest area coming to work at the site?

Table and Plate 6.2/5.2 are again wrongly labelled.

Section 5.3.7 – States “*This aligns with the staff postcode locations, with the majority of trips originating from the east of England (**with a high proportion contained within the Local Authority District of Thurrock**), with a small proportion of trips originating from London and the South East.*” This claim does not match with the postcode map which doesn't show a single member of staff in the Thurrock postcode area.

Mode share – Seems to indicate that a large amount of the staff would be arriving in cars and train, although we can see no indication as to percentages or any kind of representation as to how many actually detailed.

We would question what means of sustainable/active travel the 5% quoted in Section 5.4.1 would use, since staff locations detailed in the postcode map are all shown to be some distance away. Active travel is usually more local than long distance. Table 6.3/5.3 is again wrongly labelled.

Aims and objectives – having aims and objectives does nothing to actually change behaviour. Someone can have the aim and objective to win the lottery, doesn't mean to say it is going to happen! The data suggests that most staff would arrive in car or train, and the applicant is saying that a mini bus shuttle would be put on for those travelling by train which adds further traffic to the local road network.

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Section 6.1.7 – states “A Travel Plan Coordinator (TPC) will be appointed by National Highways to develop and implement the SSTP for the site.” We point out that this site has been operational since Nov 2019, what responsibility has the applicant shown for this during that time?

There are various mentions to reviews within time frames of occupancy of the northern section of the site, yet there is no clear indication as to when the northern part of the site will be deemed occupied.

The Action Plan is just a list of things someone will do at a desk and in no way shows any realistic means to change behaviour. How realistically for example are they suddenly going to start getting people cycling to the site when the postcodes show nobody lives close enough to realistically consider cycling? A constant repetition of reviewing travel does not mean it will result in any changes. If anything it could just mean one more member of staff on site, which could just add to the number of people travelling to the site! And yet again Table 10.1/9.1 is wrongly labelled.

Transport Assessment

Section 3.1.5 states “the proposals will be able to accommodate up to 300 workers. In the main staff will arrive at the site before 08:00 and depart the site before 16:00, with certain staff arriving later in the day to complete night shifts. It has been advised however that there will only be approximately 20 percent of the 300 contractors on site at any one time”.

Night work is again mentioned in section 3.1.9 – “Balfour Beatty has advised that there will occasionally be a requirement for the site to operate overnight, with night work teams meeting at the site and then going to the required areas.”

We question and have concerns over the fact that night shifts are mentioned when the main application form states the site will only be operational between 06:30 and 19:00 at the longest.

Although we do also now question whether the weekend hours of 00:00 to 00:00 could be stating 24 hour working or that they are not proposing the site to be open at weekends. This fact is not made clear and we know that some weekend investigative works are carried out in relation to the proposed LTC. We find these statements to be misleading, and brings the whole application documentation into question as it gives us no confidence in the information provided.

We also question the number of workers on the site, why are they stating the site would be able to accommodate up to 300 workers but then saying approx 20% on site at one time (60 staff)? Why does the main application also state 80 full time equivalent. This could mean that they are proposing to have 300 workers carrying out the work equivalent of 80 full time workers. Further clarification is needed.

Again in section 4.5.2 it states” It is therefore considered that the site will be provided with adequate parking to accommodate the level of staff which could be located on site, some 300

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members of staff" Appears to state there will be 300 staff, again leading to questions about exactly what is being proposed.

Section 3.1.8 – *"It has been advised that the low-loaders will only access the site occasionally. "*

We would ask for clarification of what occasionally is please. Occasionally to us could mean once or twice a year, and to NH/LTC it could be once or twice an hour, the statement doesn't clarify anything.

Section 3.1.10 – *"Balfour Beatty have also confirmed that gravel, sand and Type 1 materials will be stored on site, which will be delivered by 20 tonne, eight wheel tippers. Drainage material will also be stored on site and will be delivered by 20 tonne flatbeds. The gravel, sand and type 1 material will be taken to site by grab wagons and the drainage materials will be taken to site by hi-abs or by transit tippers."*

We again ask that further clarification is gained on how often these 20 tonnes eight wheel tippers would be arriving and leaving the site.

Section 5.1.1 – we question what is meant by *"The historic use will be assessed using information from a similar site"* Historically we all know the site never saw large amounts of vehicles over the short time it was operational as a coach park many years ago. How can a coach park in Maidstone be considered an adequate comparison site? Also what relevance is another site in Maidstone to this site? Why is information for Lakeside Coach Park not being used? We would suggest that maybe it is because the reality of how the site was previously used does not suit the wants and needs of the applicant.

Section 5.3.5 – We do not deem the figures in the table as realistic for the Lakeside Coach Park at all. For starters Lakeside opening hours should be noted as being completely different from what is suggested as peak hours in the table. 408 arrivals between 8 and 9 am when the mall doesn't open until 10am is questionable to say the least! Plus as we know from LTC consultation traffic modelling data, Thurrock has unique peak hour traffic movements that did not fit with what NH (HE) originally presented and it had to be changed.

Section 5.1.2 – *"The trips associated with the proposed use have been calculated using CCTV surveys at the site access, as the site is operational"* Are they suggesting that they are working on traffic movement data based on what they have recorded using CCTV on the site as it is currently used? If so then at what capacity is it currently deemed to be running at. Also what maximum capacity are they working on data for with 300 staff or the 20% capacity?

Section 5.1.3 – *"At the time of submitting the previous application, the details on how the site was intended to be used were not as developed as now....."* We question why this assessment has been prepared for the previous applicant (VIP Investments Ltd) rather than the current applicant (National Highways/LTC) Also whether the previous applicant now has an adequate understanding of the proposed use since it has apparently developed so much since the previous application, and especially in light of how many inadequacies are in the documentation that

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supports this application? Is it normal for an applicant to use a previous applicant to provide transport assessments?

Section 5.4.1 appears to be stating that the site, which according to them is not yet operating at capacity is seeing more traffic leaving the site than arriving! Have NH/LTC got a magic portal in the site (and if so is there yet another retrospective planning application on its way to cover that!!) Seriously, an explanation is needed as to how more vehicles can leave the site than arrive at it.

We also question how when this CCTV data is meant to reflect the site not yet at capacity it can be running at 501 total vehicle movements between 7am and 7pm. Various supporting documents say the site can accommodate up to 300 workers, and it is said that the site would likely operate at 20% of that (60 workers). The main application states that the equivalent of 80 full time workers would be on site. If the site not yet at capacity is said to be generating over 500 traffic movements per day, then how many are realistically expected as the site moves towards maximum capacity and possibly 300 workers, since it is only suggested that it would be around 60-80 workers there are no guarantees that it would be used by the full 300 that it could accommodate.

Section 5.4.2 – Since when does $12 + 10 = 23$?

Section 5.4.3 – *"Please note that the above figures have been calculated based on an average of the five weekdays which were surveyed. The figures presented in the response to NH and Thurrock for the last application were based on the site operating at 72 percent capacity, however it is advised that the site was operating at 100 percent capacity when this survey was completed."*

We seriously question whether the site was operating at 100% capacity when this survey was completed. Firstly because on numerous occasions in the application documentation it refers to the site not yet being complete, so surely this would indicate that if the offices etc are not complete the site would not be operating at 100%. If the site was operating at 100% in Oct 2021 and the site was not considered to be fully complete then why are the extra buildings etc needed since the site is already operating at 100% capacity without having those facilities.

In addition we would ask what 100% operational is deemed to be. We have been told the site can accommodate 300 workers but it is suggested it would generally be operating with 20% of that. Can operating with 20% of the total number of workers on the site can accommodate really be considered to be operating at 100%?

Section 5.4.6 – *"NH have advised that the above reflects the fact that the nature of the site has shifted from one where contractors were intended to be based, with potentially large numbers of daily HGV movements (DHA originally estimated up to 300), to a situation where movements to the site are predominantly going to be by cars and light vans, with relatively small numbers of LGV's and HGV's."*

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Section 5.4.7 – *“This is due to the fact that over the 18 months or more since the previous application was prepared the use of the site has progressed. Previously it was used as a base for contractors undertaking surveys and preparatory work, whereas now it is increasingly used as an administrative hub for the project. This includes a training and induction centre as well as a location for communications and consultations with stakeholders.”*

We would question whether these two statements are admitting that they have managed to use the site with up to 300 HGV movements daily in the past 18 months that they have been using the site without planning permission, so are now going to try and ignore that fact and instead choose to reflect the traffic movements that are more in their favour for this application.

Section 5.4.9 – *“It is noted that a manual traffic light system has been installed at the compound entrance to hold vehicles in the compound if the roundabout is congested. It is considered that this measure has helped alleviate any further congestion on the local highway network during peak periods.”*

Misleading as the traffic lights are not actually at the entrance but laid back into the site. We wonder whether there is a clear view of the roundabout and roads outside of the site from on the site. One minute they say that the view of the site is screened when it suits their needs, and then we are expected to believe that whilst we are not meant to be able to be bothered by seeing the site, they can see out clearly and enough to check what is happening on the surrounding roads?!

Also do the traffic lights that have been installed need to be included in the planning application?

Plus even if traffic lights are being used to control the traffic flow leaving the site onto the local road network, what is in place to control the traffic entering the site and potentially clogging up the roundabout as it waits to enter the site, especially considering there are STOP markings in the road at the first barriers into the site at the security gates?

Section 5.5 – We do not agree that the predicted traffic movements of the coach park, which has been defunct for years are a realistic representation/prediction/comparison.

We do not believe that the CCTV survey data is a true and accurate representation of the proposed traffic movements for the site.

Section 5.5.3 particularly – *“As noted previously, the trips associated with the construction of the Lower Thames Crossing will be on the network in any event and if this site was not used then Balfour Beatty would be required to create a compound on a greenfield site.”*

We again remind the applicant and their advisors that no construction of the LTC can legally begin until such time as a Development Consent Order is granted, and to date they have not managed to submit an acceptable DCO application, let alone be granted the DCO.

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Because of this very important fact it is extremely misleading to say that "*the trips associated with the construction of the LTC will be on the network in any event and if this site was not used then Balfour Beatty would be required to create a compound on a greenfield site*".

Plus if this compound is a construction site for the LTC it would also need to be added to the LTC development boundary. We therefore find the conclusions in 5.5 to be disingenuous.

Section 6 – We note that it is not made clear how many vehicles would impact certain roads/routes that we know from experience LTC investigative works traffic are currently using. For instance where do the Figures show traffic using Stifford Clays Road, traffic going through Orsett etc. Or traffic going via Stifford Hill and through South Ockendon, along with traffic cutting through North Stifford?

The data in Figure 1 is supposed to show how the Lakeside traffic would have arrived and left the site. The data seems to overlook the fact that the site was predominantly used by coaches bringing people to Lakeside for a daytrip to shop, mostly coming from long distances. The reality is that this was relatively short lived and was never that busy. We do not agree that the comparison of the Lakeside site and the Maidstone site is a realistic comparison to make, as they are simply not like for like sites.

As for the Figures listed in general, when you try to read the data the numbers do not add up on numerous routes. As just one simple example see Figure 2. It shows 10 vehicles leaving the site. One heads north out of the site, 9 head south. At the next roundabout 3 vehicles head west, 1 south, and the remaining 5 head east. At the next roundabout (the Treacle Mine roundabout) out of the 5 vehicles 2 head north towards the A13, 1 takes the A1012 and 1 takes Lodge Lane, 0 take Long Lane. So that's $2+1+1+0$ this does not equal 5! There are plenty of similar instances where the numbers don't add up when you start looking. Thus we cannot trust or believe the data as it is presented because clearly it is wrong.

We again draw attention to the fact that the Figures and data detailed in this section does not give a true indication as to the impacts on the local roads and demonstrate which routes the site traffic would use. Again we refer to the fact that there is no indication as to how much of the traffic would use Stifford Hill into South Ockendon, or cut through North Stifford, or use Stifford Clays Rd through to Orsett for example. We know the key investigative works sites are in South Ockendon, Orsett, Chadwell, East Tilbury areas in Thurrock, yet there is no clear indication of these traffic movements to and from the site.

Due to all the questionable data provided in the Figures and information provided we have no confidence that any of it can be considered reliable. We also seriously question the comparison data and the local knowledge levels of the people presenting this information, as it clearly doesn't add up to what is experienced in the real world.

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Section 6.2.10 we question the use of the wording construction site, and again point out that no construction can begin legally until a DCO is granted and NH have not even manage to submit an acceptable DCO application as yet, let alone be granted one.

Section 6.2.11 – We would reiterate that having an LTC compound in our area can in no way be considered a betterment on any level, because such a hugely destructive and harmful project can in no way be considered a good thing, as this compound is associated to that potential outcome. We also point out that whilst the site may have legal rights for such coach park use the reality is that the chance of it being used in such a way again is extremely low in our opinion, as there is no need for such a coach park in the area, it wasn't even that popular at the height of Lakeside's popularity, let alone now.

Section 6.2.12 – Again the word construction is mentioned in regard to LTC, again we point out that construction cannot legally begin until a DCO is granted. Also that the application says the compound is purely in regard to investigative works and supporting office staff, and does not relate to the construction of the LTC. If the site were to be officially an LTC construction compound it should fall within the LTC Development Boundary which it does not.

This section also in our opinion suggests that all they are concerned about is the impact to their own Strategic Road Network and direct connections, and not necessarily considering or bothered by the impact to our local roads and community.

Section 6.3.1 – Again highlights how little attention to detail this report has been given by fact they refer to Thurrock District Council. If they can't even correctly name the local authority what reason do we have to trust or believe other info in the document.

We again question the data in the figures and associated notes. The data shown in the figures does not match what we know to be routes used by LTC related HGVs. For instance again no movements are shown to be using the Stifford Clays Rd through from the Stifford Clays A13 junction to Orsett, which we have witnessed LTC related HGVs using. We do not trust or believe any of the data provided as it is not a true representation of what is experienced in reality.

Conclusion

We remain strongly opposed to the retrospective planning application for this site as per our main response that was submitted prior to the full suite of documentation being made available in an accessible format on the online portal.

We have given explanations and evidence as to why we do not believe the data provided can be trusted or believed.

We do not believe that the retrospective planning application or the associated documentation is adequate, believable, or trustworthy, due to the amount of errors contained in said

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documentation and the fact much of it doesn't match up to what is happening in reality in regard to this site.

Specifically in regard to the transport assessment and transport plan we do not believe that the documentation is adequate, and even from the often erroneous data that has been provided it is clear that the site results in an increase in traffic on the local road network, since the site has been vacant for so long, that is the basics in real day to day life. Neither do we believe there is any indication or evidence to show that it would be realistic to expect to see a change in travel mode, especially taking into account the postcode areas of the staff that would be working on the site.

Overall based on the info in all the planning application documentation, and based on our comments in our original submission as well as the comments above, we ask that this planning application be refused.