

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

Contents

Introduction	2
Retrospective Planning Applications.....	2
Delays in notification of this application	2
Inaccessible documents.....	2
Inadequacies of planning application	3
Comments	3
The Site	3
Duration of site usage	3
Work already completed	4
Materials stored on site	6
Lighting.....	6
Vehicle Parking.....	6
Trees and hedges.....	6
Employment	8
Hours of Operation.....	9
Traffic	9
Flood Risk Assessment	11
Foul Water Connection.....	11
Health Impact Assessment	12
Additional safety concerns	14
Planning Statement	14
Conclusion	17

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Introduction

Thames Crossing Action Group represent those who are opposed to the proposed Lower Thames Crossing. We strongly oppose this planning application for the above site and proposal.

Retrospective Planning Applications

We also strongly object and seriously question the fact that this is yet another retrospective planning application for this site.

- 19/01858/FUL – Dec 2019 – Retrospective application for installation of security gates
- 20/00430/FUL – April 2020 - Retrospective application for the temporary change of use of the existing coach /car park to a contractor's compound (day and night) for five years for works associated with the proposed Lower Thames Crossing and associated highway and infrastructure works on the Essex side of the crossing.

Since all applications are in relation to proposals in connection to the proposed Lower Thames Crossing (LTC) we seriously question why those submitting the applications have not done so correctly instead of retrospectively. They should know better, and we interpret these retrospective applications as a distinct lack of respect from the applicants towards the Local Authority and our community.

We also note that Government advice¹ states that *"A person who has undertaken unauthorised development has only one opportunity to obtain planning permission after the event."* We question how many opportunities to obtain retrospective planning permission have been made for this LTC compound?

Delays in notification of this application

We begin by stating that despite the letter notifying us of this application being badly delayed in delivery, as well as the festive season, we have also found a number of the supporting documents to be unavailable on the planning portal.

Inaccessible documents

To date we have been unable to access:

- Elevation Detail - 18 Bay Welfare Building
- Transport Assessment
- Pilgrims Lane Travel Plan
- Security Unit Specification and Layout
- Site Layout Plan

¹ <https://www.gov.uk/guidance/ensuring-effective-enforcement#:~:text=Are%20there%20any%20restrictions%20on%20retrospective%20applications%3F>

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- Lighting Specification (Prolectric Solar Lighting Insert V3 – LFLT)
- Existing Drainage Layout
- Combined Services
- Location Plan

However, we have done our best to respond by the deadline date, but would respectfully ask for a right to send additional comments if the unavailable documents become available.

Inadequacies of planning application

We also note that whilst full and adequate supporting documentation is needed with planning applications, we feel these documents are extremely repetitive and also contradictory causing uncertainty in the information provided. The amount of information also means it takes longer and is harder for the public to make meaningful response in a reasonable time frame.

We note various instances in our comments that highlight incorrect, misleading, and contradictory information. We question how much of the information can be trusted in light of these instances.

Comments

The Site

This latest application states that the site area is 4.50 hectares. Yet the previous application 20/00430/FUL states the site area is 5 hectares. The proposed site layout plan for the previous application shows the whole site being used. We question how something as simple as the size of the site can be inconsistent between planning applications. Clearly attention to detail is lacking.

Duration of site usage

We question whether the 5 years for the site would be from Nov 2019, or the date that permission is granted, if it is granted. Since this is a retrospective planning application it would be logical that the length of use should be from when they started using the site. Clarity is needed.

It is stated that the 5 years would cover all eventualities. However, the LTC Development Consent Order (DCO) application hasn't even been successfully submitted yet, and construction would not start for at least another 2 years. We therefore question the time frame the 'temporary' site could end up being used for if they are waiting for DCO to be granted and DCO compounds to be set up before leaving the Pilgrims Lane compound, if LTC is granted permission. Considering all the delays so far, is 5 years realistic, or would the applicant then push for an extension. This is particularly relevant if the 5 years starts from when the site began operations in Nov 2019.

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We also question the fact that in the previous application attempt, associated documentations even suggested that the site could be used for up to 10 years. See 2.2 of the Flood Risk Assessment² which was produced for 20/00430/FUL. This is the most recently published document in association with said application, so the last one published prior to this latest application being submitted.

Again we stress that we feel further clarity is needed on this.

Work already completed

We would also question what work has already been completed on site.

The application form states the work is not completed.

The 'Design & Access Statement' says it breaks down what is complete and what is still proposed. Yet much of the detail in the proposed section appears to have dates that suggest it is most likely already complete now, as most is detailed to be complete by the end of 2021.

So we know the site has been in operation since Nov 2019. We know much work has been completed, including the bases for the buildings being laid alongside buildings, which we have photos that date to June 2021.



² https://regs.thurrock.gov.uk/online-applications/files/3B015DFD74753FDC088D195F757FA459/pdf/20_00430_FUL-FLOOD_RISK_ASSESSMENT-724828.pdf

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We again seriously question why NH/LTC have not been able to submit a planning application prior to the works being carried out and the site becoming operational. This really is a clear sign of lack of respect of the process, Local Authority, and our community. How they expect us to trust them with anything relating to the LTC is unbelievable. They clearly had no intention of seeking legal permission before developing and operating this site.

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Materials stored on site

We can find no detail of what materials are/would be stored on site.

We would also draw to officers' and councillors' attention the fact we know some land that the proposed LTC construction would take place on is contaminated land, but all the boxes in the application are ticked to say no contamination.

Another reason why we feel there is a need for confirmation on exactly what is being stored on this site. Even if it is not the soil, contaminated soil could be transferred to the site from vehicles and equipment/machinery.

Further clarity is needed.

Lighting

The Lighting Specification is another of the documents that are not accessible on the planning portal at the time of preparing this document, so it is impossible for us to comment on concerns about lighting.

However, we would state that from experience that we know that LTC staff/contractors have failed to correctly and safely install lighting rigs on sites on numerous occasions. We also have concerns on the impact of lighting to wildlife, birds, insects etc, as evidence shows that lighting has a negative impact on such creatures. Since the site has been disused for some time before the applicant started using the site, so any lighting will have some impact compared to no lighting prior to their operations on the site.

Vehicle Parking

We also have questions and concerns over the vehicle parking part of the application. On the previous application this info was broken down into 'Cars, Light good vehicles/public carrier vehicles, Other (eg bus) Coaches'. Yet this application simply states 'Other mixed parking spaces' and gives no clear indication as to what type of vehicles. We again feel further clarification is needed.

Trees and hedges

We have serious concerns that the application form states that there are not trees or hedges on the proposed development site.

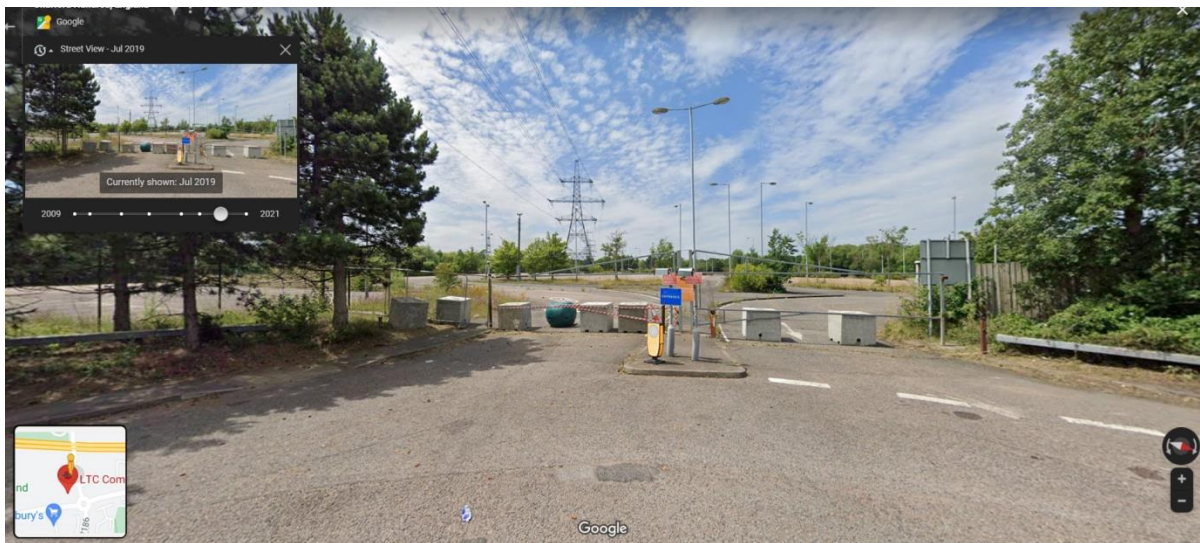
If there are not trees/hedges on the site then this would indicate that the applicant has removed them as evidence clearly shows there should be.

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Not only did the previous application confirm the presence of trees/hedges in both the application form³ and the Existing Site Plan⁴ (see image below), but also trees are clearly visible on Google Maps



Site entrance July 2019

³ https://regs.thurrock.gov.uk/online-applications/files/53830FBD4D9F96AC9D16B32BCB494B85/pdf/20_00430_FUL-APPLICATION_FORM-576528.pdf

⁴ https://regs.thurrock.gov.uk/online-applications/files/FA806106108F63D2DFB4B4EC163015B3/pdf/20_00430_FUL-EXISTING_SITE_LAYOUT_PLAN-576519.pdf

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Site entrance May 2021

Section 5.73 of the Planning Statement also confirms there are trees on site.

How can the latest application state there are no trees and hedges on the proposed development site? It also, by the look of the plans, buildings are being proposed in areas where there should be trees.

Page 23/24 in the Design & Access Statement actually details the removal of an island. It references seeing details on drawing 0625, but we have so far been unable to locate said drawing.

It should be noted that all the islands visibly have trees/hedges on Google Maps. We therefore reiterate our serious concerns that the applicant is either proposing to or has already destroyed trees/hedges on site, and does not appear to be disclosing this fact. This is completely unacceptable.

We also question when the trees/hedges were removed, if they have been, and whether it followed correct procedure for tree removal. If trees have been removed then suitable action should be taken and trees/hedges should be replaced like for like.

On the topic of the site plans for the application we do not feel adequate labelling and legend are provided.

Employment

We note that the application states that there are no full or part time existing employees, although it is stated 20 full time equivalent. It also states 220 proposed part time, and 80 full time equivalent. These seems like strange calculations to us. There are also notable amounts of vehicles already using the site and has been for years now, so how can it be listed that there are no existing employees?

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Hours of Operation

We also question the hours of operation since we know from experience that NH/LTC usually have an hour each side of work for mobilising the sites. We also know that they currently operate on weekends when needed, and there is no reference on the main application form of any weekend hours. Plus we know there is 24/7 security including mobile security on investigative sites, so we question if the site would involve any other hours of operation/traffic movements other than those stated in the application form?

We again believe further clarification is needed.

Traffic

As stated on previous applications, we have serious concerns on the negative impact of the associated traffic to this proposal/site. As detailed previously we are unable to access the associated Transport and Travel documents.

However, we note that from comments already received from National Highways as a Consultee that even they have questions about the adequacy of the application documents in regard to traffic movements.

We note that Thurrock Council Highways also question the adequacy of the application documents in regard to traffic movements. Also they comment *"It also indicates that if this site is not used then a greenfield site near to the proposed Lower Thames Crossing would be necessary."*

We note that LTC already have another compound in Tilbury with modular office space, near Tilbury 2.

And also question the references to this site being needed for DCO preparation work, since where have they been carrying out such work in the run up to their first attempt to submit the DCO application, and why can they not continue to work wherever that may be?

Also, if it is stated by the applicant that a greenfield site near to the proposed LTC would be necessary if this site is not permitted, then what details are provided and guarantees are/would be in place in regard to the routes traffic would take from this compound to the LTC sites?

We have particular concerns about the impacts to local roads, as well as the Strategic Road Network (SRN). We know from experience that NH/LTC have told us previously that their and their construction workers can use whatever highways they want when travelling to and from LTC investigative sites, as they can use the highways the same as everyone else. This gives no confidence or guarantees that vehicles to and from this site would not cut through the shortest routes on local roads.

We have concerns over the safety of traffic movements on and off of the site. The distance between Pilgrims Lane and the security gates is just 5.2m⁵. Images from Google Maps clearly shows 'STOP' markings

⁵ https://regs.thurrock.gov.uk/online-applications/files/17214AECCF6F5F0100A426A8C02CEBF6/pdf/19_01858_FUL-COVERING_LETTER-512905.pdf

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in the road and the barriers just inside the security gates. We therefore question why section 4.4 in the 'Design & Access Statement' states the barrier is 120m inside the compound entrance?

We do not believe the distance to be long enough for HGVs, buses, coaches etc to clear the road/roundabout and footpath without obstruction. With the amount of proposed vehicle movements estimated we feel there is a clear indication that a route already heavily impacted with traffic issues would suffer even further, and to an unacceptable level.

The applicant's own data in section 4.28 in the 'Design & Access Statement' states that vehicles they categorised as 'Category 2' are vehicles over 5.2m. It is stated that they predict 215 movements of this vehicle type in a 12 hour day, this means that every time this happens they will barely clear the mini roundabout at the security barrier, let alone there be room for any additional vehicles at the same time.

Why in section 4.28 of the 'Design & Access Statement' does it state that the extra traffic on the Brentwood Rd off the Orsett Cock (an already busy and dangerous section of road) for LTC related traffic to reach LTC construction sites? No construction can legally begin until such time as a Development Consent Order (DCO) is granted. Plus this application states it is for pre-construction works only (Section 1.1 'Design & Access Statement').

We also note that there were a lot of mentions of construction in the previous application documentation which raises a lot of questions and concerns, and does little to reassure us of what is being said now.

We question the endless references of traffic reduction against the coach park traffic, as that has not been open for around 20 years so such comparisons are ludicrous. Prior to the applicant starting to use the site there was no traffic at all generated from the site for some time.

There is also a pavement along Pilgrims Lane where pedestrians have to cross the entrance/exit to this site. We have concerns over safety of footpath users with the increase in traffic, especially since some of it appears to be larger vehicles which have more limited vision of those trying to cross the road on an already busy roundabout.

We would also be interested to know how many of the staff currently using the site use public transport or active travel to and from the site, and how many use motorised vehicles? It's all very well saying that staff will be encouraged to use sustainable methods of travel, but in reality will it happen?

If the applicant is genuinely aiming "to reduce the need for long distance and unnecessary travel, in turn, lowering both carbon emissions and traffic within the local area and on the highway network" as per section 4.17 of the 'Design & Access Statement' why do they not work from home full time instead of having offices?

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Also information about the 20 tonne eight wheel tippers that are expected for the southern part of the site, which was mentioned in previous application (Section 1.2.12)⁶ doesn't seem to be clarified in this latest application.

National Highways, back when they were called Highways England announced in late 2019 they would be rejecting any planning application for more than 250 houses in Thurrock due to the pressure such development would bring to the existing road network. How can proposing facilities for 325 vehicles therefore be deemed acceptable?

Section 4.27 of the 'Design & Access Statement' states that the traffic surveys were carried out when the site was operating at 100% capacity. This suggests that the site is being operated at capacity despite the fact they don't have any planning permission, again showing a complete lack of respect.

Flood Risk Assessment

We note that this assessment states that the site would be for 4 years temporary use, when the application actually states 5 year temporary use. It also states the site as being 4.5 hectares whereas the planning application says it is 5 hectares.

We note that in section 2.2 it also states that the northern part of the site would accommodate up to 200 workers, and the southern part of the site a further 50 workers. This total of 250 workers again doesn't match the info in the application form which states 220 workers.

It also comments on areas of planting, so we again draw attention to the fact that the application states there are no trees/hedges on the development site, when the reality is there should be, unless the applicant has already destroyed said trees/hedges.

We also note that the photo of modular building in Figure 2-3 says it is at the M4 compound. This gives the impression that the installation of the modular buildings has not yet begun on the site, when our photos above and google map street view clearly show modular buildings already installed on site.

Plus we note that in section 3.5 it does not make it clear that the previous application was as previously stated retrospective and still doesn't have permission.

Foul Water Connection

We question what disruption would occur in regard to section 3.50 of the 'Design & Access Statement' - *"National Highways are undertaking a feasibility study to find the best way of constructing a connection into the existing foul water network and are working with Anglian Water (the statutory undertaker) to*

⁶ https://regs.thurrock.gov.uk/online-applications/files/C4945B39B1DC62CA86158F37EEEEB34F0/pdf/20_00430_FUL-TRANSPORT_TECHNICAL_NOTE-582803.pdf

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establish a mains connection under the local road/Pilgrims Lane/Arterial Road.” These are busy roads that do not need extra works to cause further traffic issues.

We also note that in the Flood Risk Assessment that was submitted with the previous application 20/00430/FUL Section 5.7 details how connecting to the existing public sewer network is unlikely to be feasible.

It also says the only way to really deal with the foul water for the site is to install foul water collection tanks that will need to be emptied regularly. The latest application states that a septic tank would be used but they drain away.

We therefore question whether septic tanks are acceptable for the site and why previously the applicant was saying foul water collection tanks would be the only real way to deal with foul water for the site? Are foul water collection tanks being used on the site? If so are they adequate for the size of the site and has the associated traffic to empty it on a regular basis been included in the traffic assessment for the site?

Health Impact Assessment

We note that section 1.1 makes it clear that the site is already operational. This is despite the fact no planning permission has been granted.

Footways are mentioned in section 2.6, but it doesn't take into account the safety of having this footway negatively impacted by the site traffic entrance/exit on and off of a roundabout with limited space for vehicles to clear said roundabout and footway allowing safe passage for other footway and road users.

Section 2.13 states the capacity of the site is 200. Again this doesn't match up with other statements of up to 250 workers on site.

We note that section 3.6 talks of having an electric mini shuttlebus to transport people between the site and Chafford Hundred Station. Whilst EVs may have zero tailpipe emissions there are other carbon emissions and PM2.5 etc to be taken into account. The station is less than a mile from the site and easily walkable considering the HIA is talking about encouraging workers to be fit and healthy. The fact it is within walking distance is actually stated elsewhere in the documentation.

Section 3.7 is ludicrous with statements like being carbon net zero by 2030 when the proposed LTC alone is estimated to create 2 million tonnes of carbon in construction alone. And to comment on protecting greenfield land from development just adds insult to injury considering how destructive and harmful the proposed LTC would be.

Section 3.8 again we question as from experience we know that mud has been carried from LTC investigative sites on to the local road network. With so many vehicles arriving and leaving the site and all the construction that is going on creating pollution, we find it highly concerning that the HIA states there are no adverse air quality impacts.

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Section 3.9 – It should be noted that the application is attempting to give the impression that the site was an operational coach park directly prior to the new compound. The applicant should be reminded that the site had been defunct for many years, so it is not a realistic comparison to make. There has been no such coach park traffic associated to that site for many years, so all traffic this compound brings is a negative impact compared to what in reality has been happening for many years.

Section 3.12 – please see photos above that show the site entrance in 2019 prior to the compound arriving compared to 2021 photo which clearly shows the compound and how it makes a much greater impact now.

We would also comment that visually our community do not want to see LTC and associated vehicles and sites, and this compound has a definite negative impact on the health and well-being of many members of our community.

Section 3.17 – Greenbelt is greenbelt and with so much of it being under threat from projects including the proposed LTC, we take exception to the applicants playing down of greenbelt value. We also again draw attention to the fact there are trees and hedges on the site, or should be unless the applicant has already destroyed them.

Section 3.19 – How on earth it can be stated there would be no biodiversity or other adverse environmental impacts caused. Yet again we draw attention to the question of the trees/hedges on site. Also biodiversity comes in many varieties, we refer to the Swanscombe Peninsula being awarded SSSI status. What's to say what this site is habitat for? Have any environmental studies been carried out to make any educated comment on this?

Section 3.21 – where is the evidence of the proposed LTC bringing any local economic benefits? NH/LTC also refuse to provide an estimated figure on the predicted economic benefits as a whole, so again we question where is the evidence of the statement in this section?

Section 3.22 – again where is the evidence of any of this? How does this site or the LTC improve links to London?

Section 3.23 – We note that the report refers to the site being disused when it suits their needs, but refer to it as a coach park when that suits their needs. Seems they want their cake and eat it, it can't be both ways! We are also concerned that no acknowledgement is given to the negative impact having an LTC compound in our community has on people's health and well-being.

Section 3.24 – Again shows that they are using info to suit their own needs, Chafford Hundred Station is now within walking distance yet earlier in the report an electric mini shuttlebus is needed. We again draw attention to our concerns of the fact that since the compound site is so close to Lakeside etc it means it is in an area that our community use regularly and therefore exposes the community to the negative impacts of the threat of the proposed LTC yet again negatively impacting health and well-being.

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Section 4.1 – as mentioned previously what guarantees are there that the site would be vacated in 5 years when the proposed LTC project would go on a lot longer than that if it is granted a DCO? We also question whether the applicant would remove all signs of their compound such as the concrete blocks that the buildings sit on etc, and what state the site would be left in, ie would it be resurfaced for example or left as a remnant of a construction compound?

Section 5.1 – This HIA is clearly focused on the needs and wants of the applicant and does not take the local community into account at all. There is no doubt at all that this compound would and already does have a negative impact on the health and well-being of people in our community by the very fact it is associated with the proposed LTC and all the stress the threat of such a hugely destructive and harmful project has on our community, as well as all the other comments raised in regard to the HIA.

Additional safety concerns

We note that one of the associated documents contains details of Envirobulka Deluxe Fuel Storage. In the application when asked if there would be any hazardous substances stored it has been answered 'no'. How can 10,000 litres of fuel not be considered hazardous?

We are struggling to find reference to where this would be located on the site, other than the brief mention of it being somewhere in the south part of the site. This is the section of the site closest to high usage public areas being so close to the bus stop, Sainsburys and Lakeside etc.

Section 5.75 of the 'Planning Statement' – *"there is no risk of the Scheme causing contamination."* What is the fuel being used for, as there is always risk of spills/contamination when transferring fuels. We therefore find this statement of there being no risk of contamination very misleading.

We have concerns about the extra pressure having such facility on the site could have on our emergency services and also the accessibility of the site since it is an area that is often congested.

We can find no reference to the fuel storage within the HIA. Again this is not just a health and safety issue/concern for the site but also for our local community.

Planning Statement

We note that section 1.3 states *"The LTC is expected to open by 2027, subject to the necessary funding and planning approvals"*. This information is clearly misleading and incorrect as the proposed LTC is not due to open until at least 2029/30 and that is based on current hopes which could be delayed further. If they can't even get this kind of information right what else in the associated documents could be incorrect/misleading?

Section 1.6 – *"One of the planning conditions recommended for the change of use application (20/00430/FUL) is that a full planning application for the development on site must be applied for within two months of the planning permission. This application therefore adheres to this condition."* We are not

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aware of any planning permission having been granted, we would also be interested to know where the conditions have been detailed.

Section 2.5 – We are unsure how they can claim that the area to the south of the site is “*mainly commercial with warehouses and a large Sainsburys*” How can they mention warehouses but no mention of all the residential housing to the south of the site?

We again question the barrier being set back 120m in section 2.9 when barriers and ‘stop’ markings are visible in the road 5.2m off the roundabout.

Section 2.14 doesn’t really make it clear that there are pavements along at least 2 sides of the site that are used by the public.

Sections 2.16 – 2.20 regarding Planning Application 20/00430/FUL suggest that the application is still being progressed, and if granted would set a precedence. Yet in their ‘Design & Access Statement’ section 2.3 they state that this latest application supersedes the previous application. Supersede means replace, so how can they expect to have it both ways, setting precedence and superseding?

Section 3.2 states that there may be some Saturday operations occasionally. Yet the main application form makes no mention of Saturday hours. We also know from experience that NH/LTC do work on the sites on weekends when needed, so we question how often weekend work might be needed which is obviously a very busy time in that area due to Lakeside etc.

Section 3.5 seems to suggest that the site could be used whilst waiting for construction compounds to be set up, if a DCO is granted. Does this not mean that this compound should actually fall into the project development boundary if it is to be potentially used in this way?

Again it is important to question when the 5 year period begins, since the site has been in use since Nov 2019 and even if the DCO is granted no construction will be able to begin until at very least 2024, and we now know that there are likely to be further delays due to the further round of consultation etc.

In regard to Section 4.23 it states Thurrock Council “*will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in Thurrock*” For us this sums up why this application should be refused as the proposed LTC does nothing to improve economic, social or environmental conditions in Thurrock, far from it, as it would be hugely destructive and harmful.

Section 4.25 – “*The Council will work with partners to deliver at least a 10% reduction in car traffic from forecast 2026 levels*”. The proposed LTC would increase traffic if it goes ahead.

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Section 4.26 – *“The Council will work with partners to deliver improvements to national and regional transport networks to ensure growth does not result in routes being above capacity.”* Again if the proposed LTC goes ahead it will bring more traffic and routes would be over capacity⁷.

Section 4.27 – *“Development must embrace the use of high-quality design including sustainable, renewable resources of energy and low emissions technology, and enhance Green Infrastructure”* The proposed LTC is predicted to create over 5 million tonnes of carbon emissions.

Section 4.30 – *“Minimising Pollution and Impacts on Amenity Health, Safety and the Natural Environment”* Yet again we state the proposed LTC would be hugely destructive and harmful.

Section 5.3 – Considering the site has been in use since 2019 this is all questionable to say the least.

Section 5.5 – Again how does the proposed LTC improve links to London? (Same in section 5.17) And again we ask for an estimate of how much the proposed LTC would improve the economy.

Section 5.18 states the site is in easy walking distance to the station at Chafford Hundred so why are EV mini shuttle buses needed? We also question the limits on local spend with an onsite canteen etc.

Section 5.19 – In absolutely no way can the proposed LTC and any of its associated works be considered sustainable or in any way environmentally friendly. The proposed LTC is a hugely destructive and harmful road project. This site alone has negative impacts on the environment/biodiversity by the nature a busy working site on land that has been disused for a number of years, plus the loss of trees/hedges.

Also in regard to sections on Greenbelt, we find it highly questionable to claim no impacts to greenbelt land when the very operation of this site is planning to destroy huge amounts of greenbelt land with the proposed LTC.

Again with all the nonsense of trying to compare the compound site with the old coach park. The applicant seems to fail to identify that the site was not used for overnight storage of coaches/buses but rather than overflow parking facility for Lakeside when people used to travel on coaches to the shopping mall. Whereas their site has buildings and machinery etc on site 24/7 for the duration. They are also failing to identify the negative impact to health and wellbeing of locals to have to see the constant reminder of the threat of LTC due to the presence of this compound.

They say it will not be visible, but we have had lots of ongoing questions about their presence on that site since 2019 when they first started using it, so they're not as hidden away as they like to make out.

Section 5.56 – Ecology Considerations. Where are the ecology surveys to back up the statement that “the site is ecologically poor and of low ecological importance”?

And as for *“There is very little chance of any protected species being present on site, due to the continuing use on the Balfour Beatty site, with regular vehicle movements.”* Doesn't this just confirm that the southern

⁷ <https://www.thamescrossingactiongroup.com/ltc-not-fit-for-purpose/>

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part of the site operations that do not have planning permission have already potentially negatively impacted nature of the site?

Section 5.76 – *“There are no adverse air quality impacts as a result of the Scheme. The activities on site do not produce emissions or dust”*. We again comment that the very nature of what is being carried out on this site results in a hugely destructive and harmful road project. We also question that there are materials that create dust being stored on the site, visible on Google Maps. Plus the same document states that there is mitigation in place to deal with dust and mud. Why would mitigation be needed if the site doesn’t produce dust? Also everything on the site creates some form of emissions, including the vehicles being used.

Climate sections 5.95 – 5.101 – How on earth can it be claimed not to have adverse impacts on climate when the site is being used to ultimately produce a hugely destructive and harmful road project with over 5 million tonnes of carbon emissions?

Transport and Traffic – Section 5.111 – *“The Scheme is facilitating a major infrastructure Planning, the LTC which will reduce congestion in the wider area and open up links”* Again we question where is the evidence of this? The Dartford Crossing would still be over capacity even if the proposed LTC goes ahead, and there are also not adequate connections, between the LTC and the existing road network, which would result in more congestion and pollution.

Section 5.117 – We question how traffic can be reduced at junctions such as J29, 30 and 31 of the M25 with extra traffic coming into the area to the compound?

Conclusion

Thames Crossing Action Group and those we represent strongly oppose this planning application for all the reasons stated in this response. We also remain completely and strongly opposed to the proposed Lower Thames Crossing project.