23rd March 2023

Ref: 16/01232/OUT

Please accept this letter in regard to Planning Application Ref 16/01232/OUT.

As a group we represent those that are opposed to the proposed Lower Thames Crossing (LTC) road project. Since this planning application references the LTC project we wish to make representation.

We begin by clarifying that we are opposed to the proposal.

We also question the fact this is originally a 2016 planning application being resurrected, and note that pre-application advice is dated 2015.

This application has been live for far too long and should have been closed down, and a new application submitted. There are too many references to things that are considerably out of date in this application. The Environment Statement seems to be based on advice and info from 2016, which is simply not acceptable. It is not good enough to apparently state that the proposal gives assessment of the two options, ‘with LTC’ and ‘without LTC’ but only provide updated assessments for the ‘with LTC option’ and apparently rely on 2016 assessments for ‘without the LTC’. Things have changed since then.

We also question the timing of the wildlife surveys, as bat surveys in Sept/Oct for instance are far from ideal as that is around the time they become less active.

We also draw attention to the fact that it is highly likely that there is going to be further consultation and changes to the proposed LTC project. National Highways have recently advised the Planning Inspectorate of their intention to have a further round of consultation. Some of the aspects they plan on consulting on relate to the East Tilbury area. The Planning Inspectorate have also recently requested quite a bit of information from NH, details of the implications and potential changes and reassessments that might be needed as a result of the 2 year delay that was announced by the Transport Secretary. [[1]](#footnote-1)

This also leads to the question about impacts of this latest LTC news upon this proposal too. Decisions and timings see key factors, and there is now increased uncertainty with the proposed LTC that needs to be taken into account.

There has also only been a very short space of time to try and review a considerable amount of documentation and submit comments.

We also note that the application is for 830 dwellings if the proposed LTC goes ahead, or 1000 dwellings if the proposed LTC does not go ahead. We consider either amount too many, and have concerns about the impact to greenbelt, the natural environment, and the local communities.

Green belt is there for a reason and this proposal clearly destroys greenbelt that we will never get back. It would also destroy and impact agricultural land, at a time when we have serious food security issues. Our local farmers are taking hits from so many directions, and many are likely to struggle to stay in business at the rate things are going. Development, new roads etc all taking their toll. Development also has climate impacts, which in turn impact farmers ability to grow crops. This then leads to more food being imported which again has a serious impact on climate, and so the vicious downward spiral continues. We need to be supporting our local farmers to farm in a sustainable way to ensure a healthy sustainable future for us all.

We have so far been unable to find any details of estimated carbon emissions from this proposal which is of considerable size, and at a time of climate emergency something that needs to be taken into account.

This development would also have negative impacts on air quality. With a new development, particularly of this size, there would be a considerable increase in traffic movements, both through construction and upon completion, if it goes ahead.

There is plenty of evidence of increases in traffic due to new developments and new roads. This proposal appears to include provision for a link to the LTC, if both are granted permission. We have concerns that this would bring further issues and chaos to the area. Any junction with the LTC would allow for rat running to and from the road. With the addition of the proposed Tilbury Link Road, this could also create a rat run to and from the port, as well as the LTC, as both would likely connect at the same junction.

This application also proposes a new bridge over the railway for access. We have no confidence that this bridge would be delivered, and even if it were to be, that it would be in a timely manner. We are more than aware of issues surrounding things like the traffic lights at the junction of Buckingham Hill Rd and the old A13/A1013.

This bridge also appears to be very similar to the one that National Highways once promised at an LTC Task Force meeting with Thurrock Council. They said they would deliver it regardless of whether LTC goes ahead or not, but since appear to have backtracked on this.

What condition would be put in place to ensure guaranteed timely delivery of such a bridge if permission was granted? Questions need to be asked about the bridge association with NH/LTC. Does the addition of the bridge rely upon the LTC going ahead to fund it? We have no confidence, and public perception is that the bridge is perhaps mentioned in an attempt to garner favour for the development, with no guarantee of it being delivered.

The community should not have to trade off greenbelt and other impacts to get another safe access point in and out of the area. This is not just about getting in and out on a daily basis, it is life and death when emergency services cannot cross the railway lines when needed.

We also note the emergency services concerns at the lack of adequate information in this application in regard to accessibility etc.

With new developments and roads leading to more traffic, air quality would also worsen. We question whether this proposal has taken into account the new Environment Act, and air quality in general, particularly deadly PM2.5. These come from things like brake dust, tyre and road wear. Non-fossil fuel vehicles actually emit more PM2.5 than fossil fuel vehicles due to the extra weight from the batteries. The tiny particles are so tiny they get into our organs via the bloodstream. PM2.5 also pollutes our water and soil, and can travel thousands of miles. PM2.5 pollutes not only for us, but also the natural environment, wildlife and habitats.

We have concerns about the loss of habitat and impacts to wildlife and their foraging etc. The UK is one of the most nature depleted countries in the world. We cannot simply continue to reduce their habitat and foraging territory etc. We have not been able to locate info in the application regarding Biodiversity Net Gain (BNG), or how it would comply with the new requirement of 10% BNG.

In conclusion, we consider this project to be destructive and harmful, and also based on an outdated application that does not contain adequate information, and is based on plans that hold way too much uncertainty, especially in light of the further delays and issues relating to the proposed LTC. We call upon the council to refuse this application, and do everything they can to ensure their decision cannot in any way be overruled. Please listen to the people of Thurrock, this proposal is not acceptable on so many levels.

Submitted on behalf of Thames Crossing Action Group by Laura Blake, Chair – Thames Crossing Action Group  
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1. <https://www.thamescrossingactiongroup.com/procedural-decisions/> [↑](#footnote-ref-1)