

Tracey Williams
Case Manager
The Planning Inspectorate
National Infrastructure
Temple Quay House
Temple Quay
Bristol
BS1 6PN

26 October 2020

Our Ref: PoTLL/TFGP/EX/2
Your ref: EN010092

Dear Ms Williams,

Planning Act 2008

Application for the Thurrock Flexible Generation Plant Development Consent Order

Response to Thurrock Power Ltd's Letter of 16 October 2020 [AS-008]

Introduction

1. Further to the submissions of Port of Tilbury London Limited ('PoTLL') and the Applicant at Part 1 of the Preliminary Meeting in respect of the application ('the Application') for the Thurrock Flexible Generation Plant ('the Project') DCO, this letter constitutes PoTLL's response to the Applicant's letter of 16 October 2020 and also serves to confirm the comments we made during Part 1 of the Preliminary Meeting.
2. This has been submitted and sent direct to the Applicant's representative Burges Salmon on 26 October 2020, prior to Procedural Deadline B on 30 October, as requested by the Examining Authority during Part 1 of the Preliminary Meeting.
3. This letter should be read in conjunction with PoTLL's letter submitted at Procedural Deadline A [PDA-004] ('the Previous Letter') and its oral submissions made at Part 1 of the Preliminary Meeting. These taken together seek to explain and evidence why the Environmental Statement ('ES') submitted for the Project is inadequate for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations') and therefore that adequate information should be provided and consulted upon before the Examination begins.
4. In this context, we seek to re-emphasise that there is a difference between discussions and debate as to the methods, or results of an assessment, where 'other information' under the EIA Regulations may be brought forward during the Examination process, and whether in fact the assessment has been carried out *at all* when it should have been – fixing this issue would lead to the submission of 'further information' for the purposes of the EIA Regulations. This would be completely new information on a matter that is not new (being known to be required at the time of scoping, having regard to statutory consultation responses and preparation of the ES) nor required as a result of a material change in circumstances since the preparation of the ES or submission of the Application.



PORT OF
TILBURY
LONDON

PORT OF TILBURY LONDON LTD

LESLIE FORD HOUSE
TILBURY, ESSEX RM18 7EH
SWITCHBOARD: +44 (0)1375 852200
FACSIMILE: +44 (0)1375 855106

PoTLL role and national policy in relation to access to ports

5. As set out in its oral submissions at Part 1 of the Preliminary Meeting, PoTLL makes these submissions not simply as a commercially affected party, but also as a statutory undertaker (a statutory harbour authority) with legal duties to ensure that the Port of Tilbury ('the Port') is able to be accessed and egressed at all times by those who pay port dues and other charges. The safe and practical ability to use the terrestrial and marine accesses to the Port is therefore central to the performance of PoTLL's statutory functions.
6. In that context, it is notable that the construction strategy for the Project relies upon the use of Tilbury2 for construction access terrestrially, and potentially affects marine users of the Port through its causeway proposals - the use of Port land and adjacency to the Port is therefore crucial to the Project's 'buildability'.
7. To that end, PoTLL considers that the National Policy Statement for Ports ('NPSP') will be an 'important and relevant' consideration in relation to the Examining Authority's consideration, and the Secretary of State's determination, of the Application. In deciding the Application, the Secretary of State is entitled to have regard to "*any other matters which [he/she] thinks are both important and relevant to the decision*" (PA 2008, s.104 (2)(d)) and as such he/she can therefore have regard to the Ports NPS if it is considered to be important and relevant without it having to be a "*relevant national policy statement*" in accordance with s.104(2)(a). The parameters in s. 104 (2)(d) essentially act as a final catch-all which means that the Secretary of State can take into account any other matters which he or she considers important and relevant. As outlined by the Secretary of State in his recent decision in respect of the proposed Thanet Offshore Extension Wind Farm extension ('Thanet'), it was necessary to consider the NPSP "*on the basis that the application affects major ports including some that are NSIP Ports and the prospective development of future Ports, most particularly in the Thames estuary*".
8. The Applicant's failure to consider the effects of the Project on the use of Tilbury2, in the context of the pronouncements of the NPSP as to the importance of ports, should be seen in that context – as a key part of the receiving environment of the Application. The inadequacy of the ES is therefore heightened.
9. It is noteworthy that the NPSP highlights levels of UK trade (at the time of publication) and anticipated growth in UK trade in the period to 2030. It identifies that:
 - approximately 95% (by volume) and 75% (by value) of all UK trade in goods is handled by ports (para. 3.1.3);
 - total import/export of goods is concentrated in a handful of ports with the top 15 UK ports accounting for almost 80% of total tonnage (para. 3.2.1);
 - the largest container and roll on/roll off (Ro-Ro) terminals are in the South East of England (para. 3.4.11); and
 - recent consents for container developments have been in or near deep-water ports in the main coastal and estuarial locations (para. 3.4.11).
10. In this context the NPSP sets out national policy for ports. In particular PoTLL notes the statements in the NPSP that:
 - it is national policy to "*encourage sustainable port development to cater for long-term forecast growth in volumes of imports and exports by sea with a*

*competitive and efficient port industry capable of meeting the needs of importers and exporters **cost effectively and in a timely manner**, thus contributing to long-term economic growth and prosperity; and **Enhance access** to ports and the jobs, services and social networks they create, including for the most disadvantaged” (paragraphs 3.1 and 3.3); and*

- *the need for ports to be able to stay competitive and the need for resilience to account for “**short term demand peaks**, the impact of adverse weather conditions, accidents, deliberate disruptive acts and **other operational difficulties** without causing economic disruption through impediment to the flow of imports and exports”.*
11. *In setting the above policies the NPSP confirms the Government's recognition of “the essential contribution to the national economy that international and domestic trade makes.” (para. 3.3.6). It states that “for an island economy, there are limited alternatives available to the use of sea transport for the movement of freight and bulk commodities. Air freight is often used for high-value items and express deliveries, and the Channel Tunnel has a significant role in freight as well as passenger transport. But these alternatives are constrained by the volumes that can practically be carried by air, the capacity of the rail links through the tunnel and in the case of aviation the cost and environmental disadvantages. As a consequence, shipping will continue to provide the only effective way to move the vast majority of freight in and out of the UK, and the provision of sufficient sea port capacity will remain an essential element in ensuring sustainable growth in the UK economy” (para. 3.1.4).*
 12. *Furthermore, in concluding on the need for new port capacity, para. 3.4.16 states “Against this background, and despite the recent recession, the Government believes that there is a compelling need for substantial additional port capacity over the next 20 – 30 years, to be met by a combination of development already consented and development for which applications have yet to be received. Excluding the possibility of providing additional capacity for the movement of goods and commodities through new port development would be to accept limits on economic growth and on the price, choice and availability of goods imported into the UK and available to consumers. It would also limit the local and regional economic benefits that new developments might bring. Such an outcome would be strongly against the public interest”.*
 13. *The NPSP also discusses the need for competition and the importance for UK ports to be competitive, both with each other and ports in continental Europe (para. 3.4.13) as a mechanism to drive efficiency and reduce supply chain costs. It also cites the need for resilience to account for “**short term demand peaks**, the impact of adverse weather conditions, accidents, deliberate disruptive acts and other operational difficulties without causing economic disruption through impediment to the flow of imports and exports” (para. 3.4.15).*
 14. *Evidently, the NPSP recognises the real importance of ports in a national and regional context. While the need for new port infrastructure is clearly not what is being assessed through the Application, it is essential that the Project does not hamper already consented and planned port infrastructure on the Thames Estuary, in particular Tilbury2. Without proper assessment of the effect of the Project on the use of Tilbury2, it is considered that it is not possible for PoTLL, or the Examining Authority, to be able to establish whether effects on navigation, or effects on terrestrial access, would lead to PoTLL being put in a position where it would be*

compromised in meeting the policy objectives in the NPSP at the expanded Port of Tilbury.

15. PoTLL notes that these issues, as well as the pronouncements in NPS EN-3 in relation to offshore wind farms avoiding impacts to navigation, were key reasons for the recent refusal of the DCO application in respect of Thanet, with debates as to the adequacy of the navigation risk assessment ('NRA') and its conclusions in that policy context extending into the post Examination period, leading to a delay in that decision.
16. In the absence of a proper assessment of the effects of the Project on Tilbury2, and therefore the absence of any information relating to the effect on PoTLL being able to meet the NPSP policy positions, the ES is not only inadequate but also leaves the Examining Authority in a position where these important and relevant matters are not able to be analysed owing not just to a lack of *adequate* information but a lack of *any* information. To avoid the consequences of this, seen in the Thanet example, these matters need to be resolved fully and adequately and as early as possible – navigation risk, safety and the statutory functions of ports in particular should not be seen as a minor issue capable of being 'sorted out' during the Examination. In addition, it should be made clear that failure to consult adequately and meaningfully with key stakeholders on the content of a NRA would lead to a position in which the resulting NRA would be considered to be wholly inadequate with its conclusions fundamentally undermined.
17. PoTLL also considers that questions of serious detriment arising from the Applicant's compulsory acquisition proposals need to be seen in this same context.
18. It is for these reasons that, as referred to in PoTLL's oral submissions at Part 1 of the Preliminary Meeting, effects of the Project on Tilbury2 in their totality should be treated as a separate 'Principal Issue' within the Examination.
19. In that context, PoTLL responds to the Applicant's oral (at Part 1 of the Preliminary Meeting) and written (in the Applicant's letter of 16 October 2020) submissions as follows.

Terrestrial access to Tilbury2

20. PoTLL recognises that the Transport Assessment for the Application [APP-095] needs to be carried out in line with guidance such as that set out by the IEA, and that this is why that document focuses only on public roads.
21. However, and as stated in the Previous Letter, the concern is that no assessment has been undertaken of the effect of terrestrial access being taken through a working port as a land use, a key receptor of the construction phase of the Project. Considerations of the impact of traffic movements within that land use should therefore have been undertaken, even if not incorporated into a formal 'transport assessment' as submitted.
22. PoTLL acknowledges that discussions have been taking place with the Applicant as to reaching some form of commercial agreement to provide access through Tilbury2. However, throughout these intermittent negotiations, there has been a persistent lack of clarity from the Applicant as to the nature of the access required, when (in terms of time of day) it would be required, and the numbers and types of movements that would be required.

23. The key concern for PoTLL is understanding when construction traffic is to come into the Port, and how that fits into the vehicle movements associated with the RoRo terminal (which often in and of themselves involve the delivery and movement of new vehicles for the market arriving on the vessels), the Construction Materials and Aggregates Terminal, and train movements on the rail chord. This is to ensure that this traffic can be accommodated within / as part of the economic operation of the Port.
24. Until appropriate measures are in place to manage the potential conflicts of movements, including emergency instances where Port traffic must take priority, the Port is at risk of not being able to meet the needs of importers and exporters cost effectively and in a timely manner, to account for short demand peaks, and possibly of becoming less competitive as a port.
25. The Applicant has not sought to understand, and thus assess, these matters nor put measures in place within the DCO to ensure any effects can be mitigated, either through a commercial arrangement or, more importantly, as part of the ES.
26. As such, whilst it is agreed that arguments can and will be made during the Examination as to whether serious detriment is/could be caused as a result of the powers sought in the Application, it is the absence of any information as to the impact on this receptor, which forms a key part of the Application's construction strategy, that is the key procedural point now. It is a possible effect on a receptor not assessed or sought to be mitigated in any way that is the issue not, at this stage, any debate as to the results or efficacy of such an assessment or mitigation measures proposed.
27. This matter is further exacerbated by the impending Lower Thames Crossing ('LTC') DCO application, where the cumulative assessments submitted both with the Application and in the Applicant's most recent submission [AS-007] do not deal with the potential impacts of the Project's construction traffic alongside LTC construction traffic, on the land use of the Port – there is simply reference to both projects having CTMPs in place. Given the potential for overlap between these projects, and the flows then traversing the Port, this is again a fundamental procedural omission in failing to consider and assess cumulative impacts on the Port.

Public highways

28. At Part 1 of the Preliminary Meeting, PoTLL was asked whether its concerns related only to the internal roads within Tilbury2 or whether these concerns also related to public highways.
29. PoTLL can confirm that it has concerns in relation to public highways, as expressed in its Relevant Representation [RR-023], particularly with regard to the Asda roundabout where it is noted that the Transport Assessment [APP-045] and the recent cumulative update note [AS-007] highlight concerns relating to the capacity of the A1089 Dock Road arm of that roundabout. Whilst it is noted that no physical mitigation is suggested for these concerns by the Applicant, PoTLL does not raise this as a procedural issue as it is appreciated that the Applicant may seek to argue that its contribution to that capacity concern is minimal and short term and should be dealt with and mitigated in that way. This would therefore be a substantive matter to be dealt with in Examination.

30. On further analysis of the Transport Assessment and the recent cumulative update, PoTLL also has a further concern that the current material does not appear to consider the impacts of the Project on the performance of the junctions at either end of the 'link 19' road in the Transport Assessment, referred to as 'Proposed Tilbury2 road between A1089 St Andrews Road and Fort Road'.
31. **Appendix 1** to this letter comprises an extract from the General Arrangement plans for the Tilbury2 DCO, showing the layout of this road. It will be noted that at either end of the road, there are junctions for non-Port traffic to connect with the existing local highway network, with the western end in particular being a key turning off point for non-Tilbury2 traffic.
32. This non-Tilbury2 traffic includes local residents traffic but, importantly, also includes vehicles travelling to and from Gate 2 of the existing Port of Tilbury and the Portside Logistics Centre to the south of that junction, both PoTLL assets, as well as other key local assets such as the London Cruise Terminal and Tilbury Fort, from and to the strategic road network.
33. Failure to consider the impacts on this junction is another example of the failure of the Applicant to properly consider the impacts on the Port as a whole. An understanding of the impacts on this junction is therefore also required in order to enable the wider impacts of the Project on Port operations to be understood and assessed. Absent this information, a key part of those impacts will not be able to be known, or properly informed representations to be made in response.

Car parking

34. In respect of the construction car parking provision, PoTLL re-iterates the point that it is a key plank of the Applicant's mitigation strategy, and it is therefore part of the Application. The assessment relies on that provision being put in place and being effective - if that is not secured then the application has not provided a full *"description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment"* as required by Regulation 14(2) of the EIA Regulations.
35. To that end, we note that the Applicant has now submitted an application for the car parking to Thurrock Council under application number 20/01257/FUL for a site to the north of Lakeside shopping centre (which would involve flows traversing the Asda Roundabout, as the Applicant has assumed in the Transport Assessment).
36. This site is situated in the Green Belt and at **Appendix 2** to this letter is the 'Application Details' statement submitted by the Applicant to Thurrock Council for that site. PoTLL would ask the Examining Authority to note that, in common with the rest of the Applicant's approach to this issue, this statement is light touch and high level. There is therefore no certainty that this car parking will be deliverable or will be delivered.
37. PoTLL recognises that this is something that may develop over the course of the Examination; however, the key procedural issue is that the ES and the application provide no proper description of the mitigation proposed and one that is central to the acceptability of the proposals - as noted at paragraph 6.1.12 of the Transport Assessment [APP-095], 89% of the proposed construction traffic flows assessed are expected to derive from minibus and coach movements, coming from the car park.

38. It is PoTLL's case that simply saying 'there will be a car park' is not sufficient to meet the requirements of Regulation 14(2); it needs to be shown and evidenced that the car park is deliverable and described as such.
39. In this context we would note, as referenced in the Previous Letter, the Rail Central DCO, where the Examination did not commence whilst details of what the highways mitigation for that project would be were sought to be agreed between the applicant and stakeholders.

Marine access and navigation

40. In PoTLL's view it cannot be argued, as the Applicant seeks to do, that for the purposes of Regulation 14(3) of the EIA Regulations the Application is one that is not 'materially' the same as was considered by the Scoping Opinion relating to the environmental impact assessment of the Project.
41. PoTLL holds this view on the basis that paragraph 3.35 of the Scoping Report submitted by the Applicant [APP-134] states: *"In the construction phase, the applicant will consider the option to use barge delivery on the Thames where possible for bulk materials such as aggregates"*. Whilst the area suggested for this (Area K on Figure 2 to the Scoping Report) is slightly to the east of the current proposed location of the causeway, it is clear that this was an option for part of the Project at the scoping stage.
42. This was recognised in the Scoping Opinion [APP-134], when at paragraph 2.2.3 it is set out that *"The Scoping Report identifies available options for the principal components of the Proposed Development. The options include those in relation to the gas pipeline route, **access to the site via road/water** and gas engine cooling. The description of the Proposed Development and the assessment of significant effects should include all design characteristics and parameters applicable to the entire development"*.
43. At Part 1 of the Preliminary Meeting there was some discussion that Regulation 14(3) refers to an ES needing to be 'based on' the most recent scoping opinion. PoTLL does not consider that simply ignoring paragraph 2.2.3 of the Scoping Opinion and item 4.3.11, as noted in the Previous Letter, can be excused as simply relating to 'points of detail' unrelated to the question of whether the ES has been 'based on' the Scoping Opinion. The Scoping Opinion was clear that a certain topic should be dealt with in the ES but it has not been.
44. However, above and beyond the discussion of Regulation 14(3) it is clear, further to paragraph 10 of the Previous Letter, that failure to consider the effects on navigation, as a key potential receptor, is a failure to provide a description of the likely significant effects of the 'proposed development', that is, including the causeway, as required by Regulation 14(2).
45. It is noted that the Applicant seeks to draw reference to document APP-130 as having considered the issue and thus considering that no likely significant effects are identified. PoTLL notes simply here that this is one small line in a table of a document, not discussed with key stakeholders such as the PLA and PoTLL, and which assumes mitigation measures prior to any consultation with the PLA. This cannot be considered to be a proper 'assessment' of navigation risk.
46. In that context, PoTLL notes and acknowledges that the Applicant is now attempting to undertake a NRA. However, as noted in Part 1 of the Preliminary Meeting, PoTLL

can confirm that the proposed methodology underpinning the NRA is not yet agreed with the Applicant and discussions as to that methodology and the NRA itself, are ongoing with PoTLL and with the PLA. In particular it is noted that the mitigation measures proposed are not agreed, particularly as they will require PoTLL and the PLA to undertake specific steps as control measures which themselves are not yet agreed. Furthermore, there is not yet agreement on the approach to assessing the impact of the *operation* of the causeway (i.e. of vessels travelling to and from it) as well as its construction.

47. PoTLL was therefore concerned to hear that the Applicant intends to submit a NRA to the Examining Authority by Part 2 of the Preliminary Meeting on 4 November. Absent any agreement as to the scope and methodology of the NRA or any attempt to agree its conclusions with PoTLL and the PLA, PoTLL considers that submission of the NRA on this date would be pre-emptive and premature and simply an artificial or tactical exercise. It is very clear to PoTLL that it cannot possibly stand any chance of being an adequate assessment of the navigation risk caused by the Project, leaving the Regulation 14(2) test still unmet.
48. In this context, therefore, PoTLL considers that the Examining Authority may need to make procedural decisions to set out a process by which the NRA is able to be put forward in a way that the parties can proceed with the Examination, with information contained in an ES that is adequate. This is considered further below.

Conclusion on procedural matters

49. For all of the reasons stated above and as referred to in the Previous Letter and in its oral submissions, PoTLL considers that in respect of the matters set out above the ES is inadequate because of the complete absence of assessment and an adequate description of mitigation measures that will be put in place. PoTLL's request that the Examination is therefore postponed is to enable the Examining Authority, and all relevant Interested Parties, to start the Examination with an adequate ES that assesses the impacts of all aspects of the Project.
50. It is considered that the suggestion that these issues can be 'fixed' in the Examination is misconceived because:
- the EIA Regulations define 'any other information' as '*any other substantive information provided by the applicant in relation to the environmental statement*'. This is the type of information that is put forward during Examination of NSIPs; whereas
 - 'further information' is "*additional information which, in the view of the Examining authority... is directly relevant to reaching a reasoned conclusion on the significant effects of the development on the environment and which it is necessary to include in an environmental statement or updated environmental statement in order for it to satisfy the requirements of regulation 14(2)*".
51. PoTLL's position is that the Application ES provides no information that allows the Examining Authority to reach a reasoned conclusion on the effects to the Port (including Tilbury2) of navigational risk or to terrestrial access to it; both aspects that are necessary to include in an ES to satisfy the requirements of Regulation 14(2).

52. This is further information required to make up for its absence, not other substantive information to be provided 'in relation to' the ES – currently there is nothing in the ES to which assessments of navigational risk or terrestrial access to the Port could 'relate'.
53. PoTLL therefore reiterates its position set out in paragraph 19 of the Previous Letter and during Part 1 of the Preliminary Meeting as to what it is considered the Applicant needs to submit to make the ES adequate but, in respect of the second bullet point of that paragraph, wishes to make clear that consideration of the effect on land use should also properly consider cumulative impacts with LTC and the impact of the Project on the performance of the western junction at the end of link 19 of the Application's Transport Assessment.
54. Added to this, in respect of the matters raised in the Previous Letter relating to environmental topics that do not directly affect Tilbury2, and as stated in Part 1 of the Preliminary Meeting, PoTLL is simply making the point that issues as to the adequacy of the ES have already been raised by those other parties, even if they have not been expressed in EIA Regulations terms. Taken alongside the points that do affect the Port, it highlights that the ES as a whole has serious gaps and deficiencies and so PoTLL's concerns should be seen in that wider context.

Proposed way forward

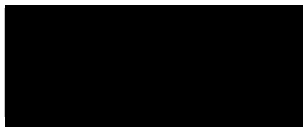
55. Notwithstanding its own view PoTLL appreciates that the Examining Authority will make its own decision on these procedural issues that PoTLL has raised and that it will need to so before or at Part 2 of the Preliminary Meeting if any delay to the start of the Examination were to be brought about by extending the Preliminary Meeting further so that the Examination does not begin.
56. If this approach were taken, it is suggested that procedural decisions could be made to facilitate:
- a. a 'Procedural Deadline C', by when the Applicant is required to bring forward the requested further environmental information. PoTLL is mindful that the Examining Authority could come to a different procedural view between terrestrial and marine issues; however, PoTLL notes in particular that if the Examining Authority agrees with PoTLL's position on marine issues, this Procedural Deadline C would need to be sufficiently far in the future for the Applicant to seek to agree the scope of and methodology for the NRA and its mitigation measures with PoTLL and the PLA;
 - b. the Applicant then carrying out the requirements of Regulation 20(3) of the EIA Regulations in relation to consultation and publicity (save for those referencing suspension of the Examination); and
 - c. a 'Procedural Deadline D', by when the Applicant is required to submit a report of consultation responses received, how regard has been had to them and its response to them. The Examining Authority could then determine next steps following that Procedural Deadline D.
57. PoTLL accepts that Regulation 20 of the EIA Regulations would not strictly be engaged if the Examination has not commenced, so it may be that step (b) above would be considered inappropriate. In this instance, Procedural Deadline D could instead be a deadline for third parties to comment on the material submitted at Procedural Deadline C.

58. If, however, the Examining Authority does not consider that the ES is inadequate and that a delay to the start of the Examination is therefore not warranted, PoTLL would in the alternative request that:
- in respect of terrestrial matters, either the Applicant is required to submit the information referred to in the second and third bullet points of paragraph 19 of the Previous Letter and added to by paragraph 53 of this letter, by Deadline 2; or, that first written questions are asked on these matters by the Examining Authority; and
 - in respect of marine/navigation matters that PoTLL, the PLA and the Applicant are requested to provide an update on NRA discussions at Deadline 1, with the actual NRA then required to be submitted at Deadline 2, with PoTLL and the PLA putting in their views on the NRA at the same time. The latter would allow the Examining Authority to understand the position as quickly as possible, rather than having to wait for Deadline 3.

DCO and attendance at Part 2 of the Preliminary Meeting

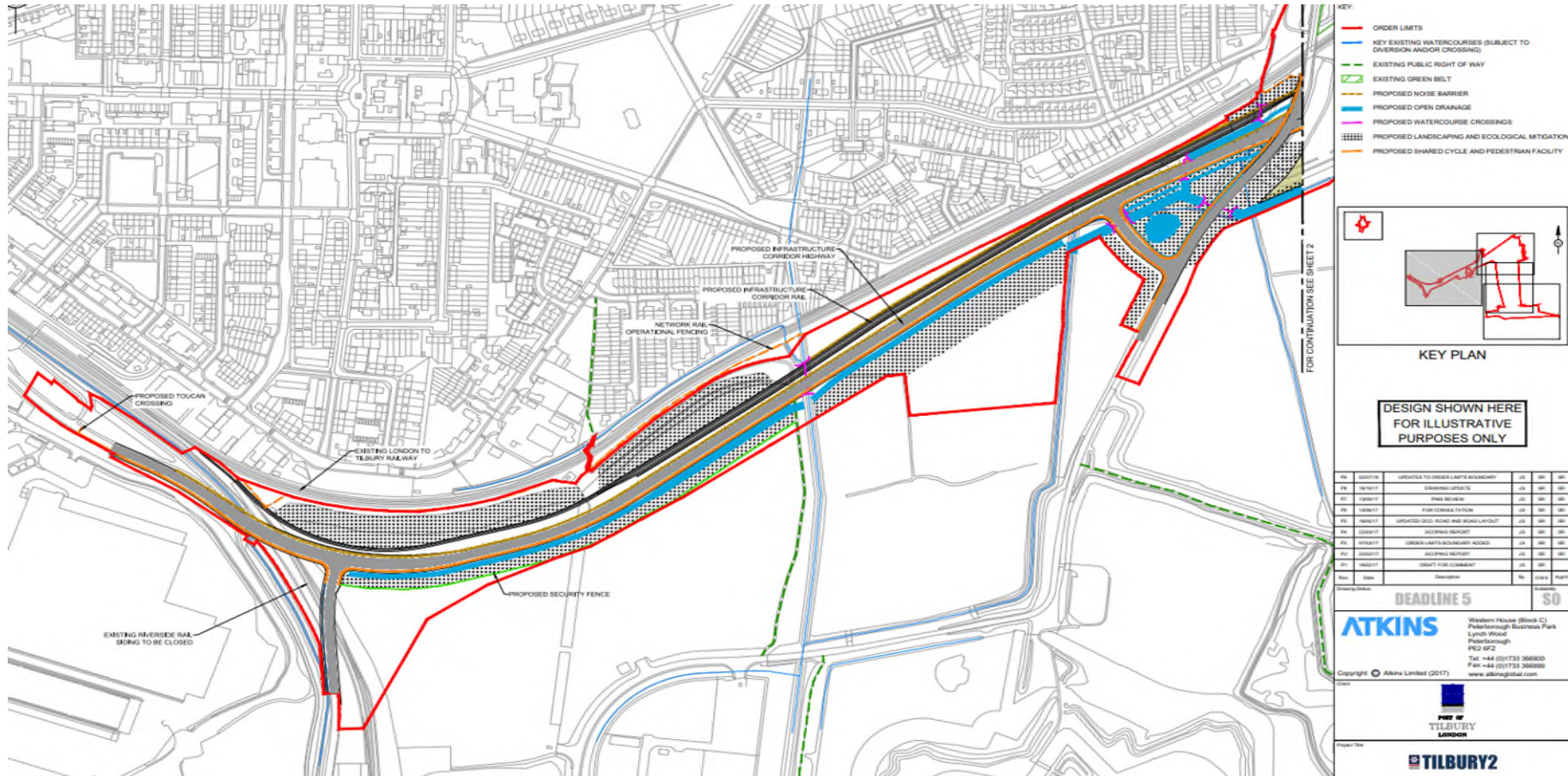
59. PoTLL can confirm that the Applicant has now provided for comment a draft set of Protective Provisions for PoTLL's benefit. It therefore proposes that a status update on the discussions on these Protective Provisions may be of benefit to the Examining Authority to be asked as a first written question, with a draft to be provided in response to that question.
60. For the avoidance of doubt, however, and for the reasons stated above and in the Previous Letter, PoTLL is not in a position to state that agreement of these Protective Provisions will be sufficient for its concerns about the Project to be withdrawn, including the potential for a serious detriment to be caused to PoTLL's undertaking.
61. Finally I can confirm that my colleague John Speakman, alongside PoTLL's legal representatives Robbie Owen, Jan Bessell and Matthew Fox, wish to attend Part 2 of the Preliminary Meeting on 4 November.

Yours sincerely



PETER WARD
COMMERCIAL DIRECTOR
PORT OF TILBURY LONDON LIMITED

Appendix 1: Tilbury2 General Arrangement Drawing of Infrastructure Corridor



Registered Office:
Leslie Ford House
Tilbury, Essex RM18 7EH
Registered in England (No. 2659118)

Appendix 2: Construction Car Parking Application Details Statement

PLANNING APPLICATION



Registered Office:
Leslie Ford House
Tilbury, Essex RM18 7EH
Registered in England (No. 2659118)

1 Introduction

- 1.1 This report sets out the planning case for development in the Thurrock Green Belt for a temporary car park. The car park would have capacity for 200 cars, temporary security fencing, temporary welfare facilities, temporary bike rack and a temporary bus shelter. The existing hardstanding would be retained as parking surface and all trees would be retained on site.
- 1.2 This Application should be viewed in relation to the Thurrock Power DCO, submitted to the Planning Inspectorate on 27 May 2020.

2 Application Site

- 2.1 The Application Site is shown on the Location Plan, it comprises approx. 1 ha, sandwiched between the Lakeside shopping centre to the south, the A13 to the north, the A126 to the east and the M25 to the west.
- 2.2 The Application Site comprises previously developed land forming part of the old Arena Raceway facility that was in place from the late '70's. The Site now forms a small part of the area proposed for North Lake, a new community in the north of the Lakeside Basin.
- 2.3 There are no Public Rights of Way across the site.
- 2.4 Access to the Site would be via the existing access of the A1306 (Arterial Road West Thurrock).

3 Need for Development

Why this location

- 3.1 The temporary car park (for up to 3 years) would function as a transfer point for construction workers on the Thurrock Power DCO project to park cars and transfer to minibuses and coaches for access to the construction site on Tilbury Marshes. This will reduce traffic flows on the local roads approaching the construction site. As such the temporary car park needs to be located close to the A13 and within 5 miles of the DCO Site.
- 3.2 All options within a 5 miles radius of the Site are within the Thurrock Green Belt.
- 3.3 This site is one of only a few brownfield sites that are potentially able to fulfil this function and represents a continuation of its previous use.
- 3.4 This application is for the temporary use of the site using the existing hardstanding which would remain in place. Temporary welfare and security measures would be put in place for the duration of its use. These structures would then be removed and the land made available for future development.

4 Summary

- 4.1 The temporary car park is proposed as a possible mitigant to reduce construction traffic flows on the local roads approaching the Thurrock Power construction site. The car park has capacity for 200 cars, and a car sharing scheme will be actively encouraged. Workers will then be able take MPV's to the construction site via shuttle so reducing the number of vehicles on the local smaller roads. This car park will only serve a temporary purpose and is on previously developed land which has been set aside for re-development. The site itself is also sandwiched between the A13, Lakeside Shopping Centre, the A126 and the M25.
- 4.2 If the Thurrock Power Site is not built out this temporary car park will not be needed.