

From: [GRAHAM Jessica](#)
To: [Thurrock FPG; Williams Tracey](#)
Cc: [TEARLE Lee](#)
Subject: Thurrock FGP - EN010092 - HE Procedural Deadline D submission [BDB-BDB1.FID10637639]
Date: 25 January 2021 19:28:03
Attachments: [Highways England Response - The Race Way Tavern Arena Essex Arterial Road Purfleet-on-Thames Essex RM19 1AE - 2001257FUL.msg](#)

Dear Ms Williams

I am making the below submission on behalf of Highways England in relation to the above referenced scheme at Procedural Deadline D. I would be grateful if you could please confirm receipt.

Kind regards
Jess

Dear Ms Williams,

Application for the Thurrock Flexible Generation Plant Development Consent Order (EN010092)

This email constitutes Highways England's Procedural Deadline D submission. Highways England wishes to make the following submissions:

- Highways England continues to work with the Applicant regarding its application and the interface with the proposed Lower Thames Crossing (LTC) scheme and in particular the gas pipeline route referred to in the Applicant's Procedural Deadline C cover letter.
- Highways England notes that the consultee comments from the Port of Tilbury appended to the Applicant's Procedural Deadline C cover letter refer to the Applicant's planning application to Thurrock Council for provision of temporary off-site car parking and welfare facilities (Ref: 20/01257/FUL). Highways England wrote to the Applicant on 9 December 2020 seeking to understand how the vehicle movements presented in the planning application relate to the Transport Assessment submitted in support of the DCO application. A copy of the email is attached to this submission. Since that email Highways England has been sent a copy of a Technical Note (TN) that was produced by the Applicant to address concerns raised by Thurrock Highways officers. However the TN does not address the information specifically requested by Highways England and as such Highways England believes that this matter remains outstanding.
- Highways England wish to attend part 2 of the Preliminary Meeting on 16 February by listening to the proceeding on the day and would be happy to answer questions from the ExA in relation to bullet point 2 above if required. Names of the attendees on behalf of Highways England will be confirmed in advance of the Preliminary Meeting.

As regards any other matters raised during the Preliminary Meeting, including any potential interface with the proposed LTC scheme, Highways England will respond in writing as necessary at the relevant deadline.

Highways England (ID number 20025438)



Jessica Graham [Associate](#)
T +44 (0)20 7783 3982
W www.bdbpitmans.com

For and on behalf of BDB Pitmans LLP
One Bartholomew Close, London EC1A 7BL

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From: [Bolton, Matt](#)
To: ["dm@thurrock.gov.uk"](mailto:dm@thurrock.gov.uk)
Cc: ["Raper, Charlotte"](#)
Subject: Highways England Response - The Race Way Tavern, Arena Essex, Arterial Road, Purfleet-on-Thames, Essex, RM19 1AE - 20/01257/FUL

For the attention of: Lottie Raper

Site: The Race Way Tavern, Arena Essex, Arterial Road, Purfleet-on-Thames, Essex, RM19 1AE

Development: Temporary car park with a 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.

Your Reference No.: 20/01257/FUL

Highways England's Reference No.: #89772 / 11915

Dear Lottie Raper,

Thank you for your email dated 24 November 2020 on the above planning application consultation and indicating a response was required by 15 December 2020.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of this proposed development, Highways England is interested in the potential impact that the development might have the SRN, in particular, the M25 at Junction 30, on the A13 and on the A1089. We are interested as to whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of development.

Prior to providing this response, Highways England officers met with Thurrock Council officers in order for us to be able to make a joint assessment on the likely impacts for both the strategic and local road network, as a result of the development.

We have reviewed the Transport Statement (TS) which has been submitted as part of the planning application. This document notes that the proposed temporary car park is to be provided in connection with the Thurrock Power Ltd DCO application, which was submitted to PINS in May 2020. The TS states that the car park will be used for construction contractors who will then be transferred to the site by minibus or coach in order to reduce the impact on the local road network in the vicinity of the DCO application site.

The planning application is made for a temporary period of up to three years, as stated in the applicants covering letter.

The TS states that 75% of construction workers drive to work, based on census data for construction industry workers in England. This development will have up to 350 construction workers based at the site. The TS goes on to state *“At the construction peak, it is estimated there will be up to 262 construction staff arriving and departing via car per day.”* Noting the location of the proposed car park and its proximity to the SRN, we consider there to be the potential for a significant number of trips on the SRN. Therefore, we would have expected the TS to have assessed the impact of their proposed car park on the M25 at Junctions 30 and 31 and on the A13 and the A1089.

This would have considered the number of trips at the above junctions in AM and PM peak hours, including staff trips and minibus/coach trips to and from the site.

Noting this, could the applicant please provide a traffic flow diagram showing the number of trips associated with their temporary car park, including staff and minibus/coach transfers, and their distribution in order to evidence the developments impact on the SRN.

The TS states on page 2 *“it is estimated that that 10% of staff will not use the temporary car park and will arrive at the Thurrock construction site directly via car, 1% would arrive as a car passenger.”* We would also expect these trips to be included in the traffic flow diagrams requested above, in order for us to fully understand the number of trips likely to route via the SRN.

A Travel Plan (TP) has not been submitted in the planning application. Highways England will be interested to understand how the applicant intends to reduce the number of single-occupancy vehicle trips, and promote more sustainable transport methods. Could the applicant please provide a TP which sets out ways through which should cover the following issues:

- Travel Plan co-ordinator
- Travel Surveys
- Measures to be taken to encourage walking, cycling, car sharing, use of public transport and measures to reduce car travel by staff.
- The potential for local short term housing for workers
- Monitoring and review.
- Programme for implementation.

Highways England notes that this planning application has been made outside of the DCO application. Therefore, it is considered that the impacts of the construction workforce may not have been fully assessed within the DCO application, which are therefore being considered as part of this planning application.

Based on the above, without a full understanding of the potential impacts of the development, there is insufficient information for us to be satisfied that the proposals will not materially affect the safety, reliability and/or operation of the

SRN (the tests set out in DfT C2/13 para 10 and MHCLG NPPF para 109).

I trust that the above is of assistance and would be grateful if you could pass the above comments to the applicant and their consultants for further consideration and reply. This email does not constitute a formal recommendation from Highways England.

Accordingly, we formally request that your authority refrains from determining this application, (other than refusal) until such time as we have received and considered all the requested information. Once we are able to adequately assess the above and its potential impact on the SRN, we will provide you with our final formal response.

If, in the meantime, your authority wishes to determine the application, please let us know and we will provide you with a formal response based on the information available at that time.

We look forward to receiving the additional information in due course. Should you have any queries regarding our response please contact us at planningse@highwaysengland.co.uk.

Kind Regards,

Matthew Bolton (Sent of behalf of Janice Burgess Area 5 Spatial Planner)

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: <https://highwaysengland.co.uk>

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Highways England Company Limited | General enquiries: 0300 123 5000
|National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park,
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