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17 July 2023

Mr Rynd Smith

Lead Member of the Examining Authority
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6P
By project webpage submission

Dear Mr Rynd Smith,

Lower Thames Crossing Development Consent Order
PINS reference Number: TR010032
IP Reference Number: 20035558

Please accept this letter as a summary of the Written Representation on behalf of Uniper. The written representation sets out Uniper's concerns with regards to the Lower Thames Crossing proposals.

A planning application was submitted April 2021 (planning reference: MC/21/0979) at Kingsnorth Power Station, Hoo St Werburgh, Rochester Medway ME3 9NQ for:

"Outline planning application with all matters reserved except access (to be taken from Eschol Road) for the construction of flexible EG (iii)/B2/B8 use class buildings, sui generis uses for energy uses and a lorry park, together with servicing, parking, landscaping, drainage, remediation, demolition and earthworks"

National Highways was a statutory consultee and they concluded:

'The evidence submitted, when combined with all other evidence available to the parties, demonstrates that the proposals would have an impact on the M2J1. The evidence also demonstrates that the junction has very limited spare capacity. Once that remaining spare capacity, approximately 60 AM or PM peak movements on the merge/diverges occur, any further development will require a significant improvement to the junction.'

National Highways imposed a condition on the planning permission that constrains the development to generating no more than 60 traffic movements on the M2 J1 slip roads in either the AM or PM peak hours, in order to maintain satisfactory operational performance and safety. This clearly indicates that National Highways regard the operation and safety of this junction as very sensitive to additional traffic movements without extensive amendments to the merge/diverge layouts.

The Lower Thames Crossing Transport Assessment however, forecasts significant increases in traffic at the M2 J1 interchange but fails to provide suitable amendments to the merge/diverge layouts.

Further more, Uniper are concerned that the exclusion of MedwayOne and the Hoo Development Framework from the Lower Thames Crossing assessments means that the full impact of the new crossing on this area has not been fully assessed.

Design with community in mind

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Plans for the LTC are driven by expected traffic and economic benefits at a national scale. However, these benefits would not be extended to the Hoo Peninsula which would see a worsening of traffic conditions on its strategic routes. The proposals will result in traffic capacity being taken away for local people making journey times less reliable for a variety of journey purposes. This is a region more reliant on car use than neighbouring places such as London.

This potential impact is contrary to the LTC objectives set below.

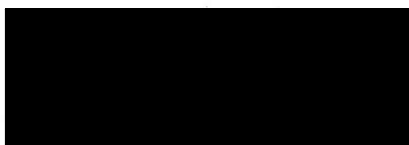
LTC Scheme Objectives¹

Scheme Objectives	
Transport	<ul style="list-style-type: none">• To relieve the congested Dartford Crossing and approach roads and improve their performance by providing free-flowing north-south capacity• To improve the resilience of the Thames crossings and the major road network• To improve safety
Community and environment	<ul style="list-style-type: none">• To minimise adverse impacts on health and the environment
Economic	<ul style="list-style-type: none">• To support sustainable local development and regional economic growth in the medium to long term• To be affordable to government and users• To achieve value for money

Should no mitigation come forward and traffic conditions worsen as expected, the LTC would not in any way support sustainable development in the Hoo Peninsula. The transport objectives of resilience of the major network and improved safety would not be realised in this context. Reduced capacity on local roads is also unlikely to contribute to improved impacts on health and the environment. If the wider impact of safety and congestion on the road network within the Hoo Peninsula is not addressed, future development of this region could be compromised. Development which is necessary to see growth and the achievement of local plan ambitions.

.Yours sincerely,

STANTEC UK LIMITED



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¹ [Application Document Ref: TR010032/APP/7.1](#)

