

PROPOSED LOWER THAMES CROSSING DCO (ref: TR010032)

WRITTEN REPRESENTATION ON BEHALF OF MORZINE LIMITED FOR EXAMINATION STAGE D1

ID: 20035707 – Morzine Limited

Introduction

Thames Oilport (TOP) forms part of the Employment Allocation of the former Coryton Oil Refinery pursuant to the Core Strategy Proposals Map. This land was also designated as one of the Borough's identified Growth Hub's and highlighted as a Primary Employment Area on the latest Borough Proposals Map.

TOP benefits from established and consented use as an Oilport/Biochemical Plant, which has recently begun to be decommissioned. As such, the TOP Site could continue to be used for such activities. Consequently, it is essential to attribute consideration to the amount of traffic generation arising from the site if the existing use is retained when assessing the LTC.

It should be noted that Thames Oil Port (TOP) adjacent to Thames Enterprise Park (TEP) is currently highlighted in the Local Plan Policies Map (adopted December 2011) as a Primary Industrial and Commercial Area, alongside TEP and London Gateway. All three of these were also identified as either 'Oil Refineries' or 'Oil: Refinery Expansion Areas' on the Policies Map. The designation is historic and reflects the previous use of TEP and TOP as part of the Coryton Oil Refinery and the adjacent London Gateway Land as having the potential to accommodate expansion of the Oil Refinery.

Accordingly, TOP presents a unique opportunity of c. 96 hectares of previously developed brownfield land to Thurrock, in the form of natural extension to TEP, and alongside TEP and London Gateway affords the Borough with an Opportunity to further consolidate employment into the east of the Borough creating a key Employment Hub within the Thames Freeport – within which TOP also sits.

TOP is considered to have a developable area of c. 54 hectares which could support up to 400,000 sqm of industrial/ commercial floorspace subject to design and feasibility. This would equate to up to 6,000 further jobs based on an 80:20 Split of B2/B8 Use Class, pursuant to Employment Densities set out in the HCA Employment Density Guide (Second Edition) 2015.

It is therefore in our view that it is necessary to consider the cumulative needs of both TEP and TOP in terms of highways, as their combined potential for employment delivery will significantly contribute to the Council's long-term economic growth.

Morzine Ltd is in-principal supportive for the Lower Thames Crossing (LTC), however, there are concerns with the 'severe' impact on the local highway network. This will consequentially lead to impacts on the economic activity, operations and future growth of TOP. Morzine Ltd's relevant representations are as follows:

- Inadequate information has been submitted to show that the impact at (A13/A1014) The Manorway Interchange and (A13/A128) Orsett Cock Roundabout have been properly assessed. Both are located along the main point of access to TEP. The application, therefore, fails properly to assess congestion and capacity issues at these Junctions or consider whether and to what extent these impacts need to be mitigated.
- Congestion on the local highway network, due to the proposed LTC development, has the real potential to create significant adverse impacts at The Manorway Interchange and Orsett Cock Roundabout, which in turn would impact access to and from TEP.
- Further concerns in relation to construction timing and phasing, route choice, route availability and the number of u-turn movements which would be diverted to The Manorway Interchange due to the proposed layout of Orsett Cock Roundabout – particularly at the A13/LTC junction, and the network operation and traffic flow.

Previous Representations

Whilst Morzine Ltd has highlighted in its previous consultation responses, in-principal support for the LTC, a number of concerns have been raised, which remain.

In the original consultation responses, Vectos/ SLR Consulting, acting on behalf of TOP, raised concerns in relation to construction timing and phasing, route choice, route availability and the number of u-turn movements which would be diverted to The Manorway Interchange due to the proposed layout of Orsett Cock Roundabout – particularly at the A13 / LTC Junction, and network operation and traffic flow.

Further concerns in relation to route choice and route availability were raised in responses to both the Design Refinement Consultation and the Community Impacts Consultation.

These concerns subsist and the wider impact of this proposed new link and despite this matter being raised in TOP's representations during the consultation process, has not been fully assessed within the Local Refinement Consultation carried out by LTC. The potential impact of LTC at The Manorway Interchange is still not fully considered. Final conclusions on the potential impact cannot be made without further, more detailed, modelling and assessment work being completed and formally submitted to the examination.

The potential impact and operation of TEP and TOP was still not accounted for in either the Supplemental Design Consultation or the Design Refinement Consultation.

Response to Examination

Issues

TOP's concerns in relation to The Manorway Interchange and Orsett Cock Roundabout have yet to be addressed.

It is understood that Thurrock Council and DP World/London Gateway (DPWLG) have also raised similar concerns. In an attempt to address these concerns LTC has undertaken additional modelling work of The Manorway Interchange and Orsett Cock Roundabout in the form of standalone VISSIM models. However, the detailed modelling work has not been shared directly with TOP nor has it been formally submitted to the examination. TOP, therefore, reserves its right to further comment on this supplementary modelling work once / if it is submitted formally to the examination.

However, from the information that has been reviewed by TOP of the supplementary modelling work that has been undertaken¹ TOP is concerned that the interaction between The Manorway Interchange and Orsett Cock Roundabout is still not fully understood by virtue of the assessment taking the form of two standalone VISSIM models. The output from the models also demonstrates significant queuing and delay at Orsett Cock Roundabout, particularly on the eastbound A13 off-slip, and this has the potential to have a knock-on effect on The Manorway Interchange and in turn the operation of TOP. This is a critical issue given that The Manorway Interchange is the sole point of access for all HGV movement to and from TOP (and the majority of all vehicle movements).

TOP has attempted to engage directly with LTC over the last 12 months to to engage in the consultations process to better understand the LTC's modelling work which has been completed and the outputs from it. However, following an introductory meeting in November 2022, the only meeting date we have been offered this year is Friday 14 July 2022, four days before the deadline for these Written Representations.

The purpose of this meeting was for LTC to present the additional VISSIM modelling work which LTC had undertaken in relation to Orsett Cock Roundabout and The Manorway Interchange. However, no new information was presented by LTC, no assurance was given as to whether the additional VISSIM modelling work would be submitted to the examination, and representatives of LTC simply advised that

¹ 'Orsett Cock 2030 Operational Appraisal Design, Release 4.3, Operational Modelling' and 'Manorway 2030 & 2045 Operational Appraisal Design, Release 4.3, Operational Modelling'

the additional modelling work reported the 'same results' as the original modelling work. This clearly falls short of meaningful consultation.

The meeting on 14 July 2023 did raise further concerns in relation to the assessment work undertaken by LTC. There is no assessment of the busiest peak period on the local highway network – the shift changeover period at 14:00. Instead, LTC has assessed the 'average' hourly flow between 10:00 – 16:00. This methodology makes no allowance for the spike in movement which is forecast to occur to and from TEP, TOP and DPWLG to coincide with shift changeovers. Therefore, the true impact and operation of the local highway network with LTC during construction and in operation is not properly considered or assessed. The inputs for TEP are taken from 2021 and do not include or allow for the latest mitigation proposed to be delivered by TEP in accordance with the Resolution to Grant for redevelopment secured on 9 June 2022 (Ref: Application No: 18/01404/OUT).

In response to why LTC had not engaged with TOP more comprehensively, and shared information which had been shared with others or entered into a Statement of Common Ground, the response was that 'the line had to be drawn somewhere'. This approach and response fails to appropriately recognise the status of TEP and TOP, and the major contribution to the regional economy each site will deliver individually, and of course collectively. It also has not allowed TOP to share information with LTC to assist in the assessment work, including the most up to date set of traffic flows, the proposed package of mitigation – including improvements at The Manorway Interchange, and our VISSIM modelling work which is the most up to date model of the local highway network and has been signed off and approved by National Highways.

Economic Impact

TEP, TOP and the London Gateway combined account for 85% of available employment land supply within Thurrock whilst sharing the same access route enhancing the risks arising from delays resulting from LTC.

TOP is concerned that if the impacts of LTC are not addressed as part of its construction and operation, it has the real potential to create significant adverse impacts at The Manorway Interchange and Orsett Cock Roundabout, which in turn would pose the risk of deterring investors and operators from TOP.

Given that the supplementary transport modelling work is not available at the time of writing this representation, therefore we reserve the right to comment on the Economic Impact of LTC at later stage, when sufficient information is provided to TOP.

Conclusion

TOP's position remains that it is in principle supportive of the Application, but accounting for previous representations regarding the potential impacts, TOP maintains significant concerns about the potential impact on the local highway network serving TEP and TOP, primarily The Manorway Interchange and Orsett Cock Roundabout as a result of the Application, both during construction and operation, and that the Application does not adequately assess these impacts nor provides the mitigation required.

TOP has made numerous representations (which are attached), unfortunately, the level of engagement has not been to the level expected bearing in mind the importance of TEP and TOP to the local, regional and national economy.

In summary, it is essential to consider that TOP site is considered to have the capacity to support up to 400,000 sqm of industrial/ commercial floorspace which would equate to up to 6,000 further jobs.

Whilst in principle Morzine Ltd do not object to the LTC, it is essential that the local road network operates optimally to allow TOP, its neighbours and Thames Freeport partners, London Gateway and Tilbury, to operate without impact. We wish to work with all parties to find the right solutions.

Morzine Ltd wish to work with all parties to find the right solutions, as based on the currently submitted information, TOP is of the opinion that significant further consideration needs to be given to the proposed

LTC Application to sufficiently support the above mentioned core employment sites and secure Thurrock Council's economic growth through industrial and logistics sectors alongside port-related operations and energy.

Morzine Limited

18 July 2023