

23 August 2023

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

**A122 LOWER THAMES CROSSING (REF: TR010032)
DEADLINE 3 WRITTEN REPRESENTATIONS**

MELVILLE HAMILTON LOWE MOTT – AFFECTED PARTY REFERENCE: AP1308

C H L MOTT & M MOTT – AFFECTED PARTY REFERENCE: AP1369

THE OWNERS OF NORRSKKEN, STATION ROAD, EAST TILBURY: RR 2003579

On behalf of our above clients, the Mott family, we write further in response to the Applicants written responses, *9.53 Comments on WRs Appendix F - Landowners*

1. WCH

We note the Applicant's undertaking to continuing discussions in respect of this significant issue. As the ExA are aware, we have raised this issue in previous submissions and look forward to reviewing the case for the Applicant's proposed WCH routes during Examination;

2. Northern Portal Access Track

Whilst we acknowledge the Applicant's Project does not include a link road, as previously submitted we consider that alternative means by which the rights required can be delivered for the Project without permanent acquisition, are possible.

We have recently met with the Applicant and on this issue. At the time of writing, we are awaiting the Applicant's response to those discussions.

3. Access to land south of Station Road for development purposes

We note the Applicant's comment that this issue is for the detailed design and build phase of the Project and whilst we have had constructive discussions with the Applicant recently, at the time of writing, our clients would welcome further reassurance from the Applicant that the provision for access generally will be provided as a firm undertaking as part of the DCO.

We would welcome the Applicant and ExA views on the most appropriate means of providing this undertaking.

4. Linford Borehole & Water Pipeline

We fully acknowledge the Applicant's amendments to the proposed utility works hub and location of the pipeline north of our clients main land holding to facilitate the proposed development under planning application ref: 16/01232/OUT).

However, we do not consider that the Applicant has addressed the specific issue of why permanent rights are sought for a temporary water supply. We therefore consider that a joint meeting with the Applicant and Essex & Suffolk Water would assist in dealing with this issue and we have submitted a request to the Applicant.

5. River Thames Jetty/Wharf Access

We note the Applicant's responses in this respect.

The area of land on which our clients existing wharf licence is situated is outside the Order Limits and subject to an Option Agreement in favour of the Port of Tilbury Limited. The nature of the Option Agreement is subject to the Port of Tilbury exercising that Option.

Either way, our clients right to unimpeded access must either be provided from the adopted highway to its current location, any new location to which the wharf licence is moved (on land not within the Port of Tilbury option agreement land) or compensated for if the Applicant does not provide such access to connect to the adopted highway. We do not consider that extensive discussions have been had with the Applicant in respect of this specific access issue and the Applicant has not sought to address this in any plans submitted to the Examination as part of its DCO application.

We have requested further proposals from the Applicant as to how they intend to remedy this issue and this is awaited. We would therefore reserve our clients position in the context of the Examination to the extent that in the absence of any further proposals from the Applicant, that the ExA make a direction as to how they consider it should be addressed.

We would also highlight that our client's river frontage (plots 16-40, 16-41 and 16-44) is not proposed to be permanently acquired by the Applicant and therefore (subject to Port of London Authority permission to relocate the wharf licence should the Port of Tilbury exercise their option over the land on which it is currently situated) the proposals to permanently acquire the land to the north by the Applicant for Tilbury Fields would sever access to our clients river frontage land.

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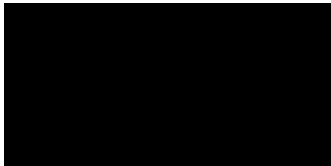
6. Special Category Land

With reference to our written responses to the draft DCO at this deadline 3, we note the Applicants response under 5.8.2 of 9.63 *Applicant's response to IP comments made on the draft Development Consent Order at Deadline 1.*

Do the ExA consider that it is appropriate in this instance to deprive that third party freeholder of his land for the purposes of this Project?

We look forward to receiving further responses from the Applicant and the ExA in respect of the matters raised above.

Yours faithfully



M R Holland MRICS
Director
HOLLAND LAND & PROPERTY LTD
(Agents for the above-named Affected Parties)