

31 October 2023

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

**A122 LOWER THAMES CROSSING (REF: TR010032)
DEADLINE 6 SUBMISSION**

CHEALE GROUP LIMITED – RR20035735

MULBERRY STRATEGIC LAND LIMITED – AFFECTED PARTY REFERENCE: AP1581

On behalf of our above clients, Cheale Group Ltd and Mulberry Strategic Land Ltd, we write further to Compulsory Acquisition Hearing 3 ('CAH3') held on 17 October 2023 with our written submissions in support of the oral representations made at that hearing.

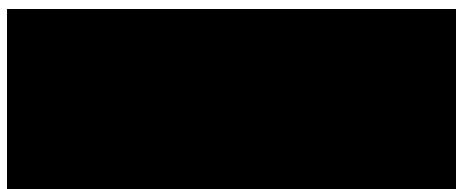
Please refer to the Plates as submitted to the ExA for the purposes of assisting CAH3 and to which we presented our oral representations; a further copy of which are attached to these submissions.

Plates 82 & 83	<p>Plates 82 and 83 show the Applicant's proposals for utilities works areas in Plot 44-90 and 44-92 together with a route of access (under temporary possession with permanent rights) affects land owned by Cheale Group Limited.</p> <p>Our clients total land area in this location is as edged on the outline plan in Plate 84.</p> <p>Mulberry Strategic Land Ltd hold an option over this land for the promotion of alternative commercial use.</p>

Plate 84	<p>Plate 84 shows a broad draft masterplan of commercial development which remains subject to further technical work and submission to Havering Borough Council through their Local Plan review.</p> <p>The Applicant's proposed route of access rights follows the yellow line.</p> <p>Our submission is a request to the Applicant to provide a legally binding commitment to a lift and shift provision with the Applicant and relevant statutory undertaker that the proposed route of access can reconfigured as part of our client's emerging development masterplan – for example, in the case of the current draft masterplan, along the route coloured blue.</p>
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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)