

16 November 2023

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

**A122 LOWER THAMES CROSSING (REF: TR010032)
 DEADLINE 7 WRITTEN REPRESENTATIONS**

E AND K BENTON LIMITED (AP1717)

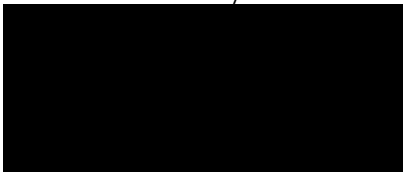
On behalf of our above clients, E and K Benton Limited, we write in response to the Applicant’s 9.129 post-event submissions for CAH3 and 9.133 post-event submissions for ISH10 as referenced [REP6 - 087](#) and [REP6 - 091](#) in the Examination Library.

REP6 – 087 REF:	RESPONSE TO APPLICANT’S CAH3 SUBMISSIONS
3.6.3	We note that the Applicant will give further consideration as to commitments for our client to be invited to join the Traffic Management Forum. Given the issues we have raised previously in regard to possible future development at South Ockendon, we request that this invitation is explicit in including our client’s development partners, E A Strategic Land LLP (AP1539).
Annex D – D.7.1	We confirm that we are in active discussions with the Applicant in respect of a proposed tripartite agreement on behalf of E and K Benton Ltd. This is without prejudice to our client’s standing objections to the upgrading of footpaths to bridleways and other PROW issues we have raised at CAH3, ISH10 and in our written submissions to date.

REP6 – 091 REF:	RESPONSE TO APPLICANT’S ISH10 SUBMISSIONS
Annex B	<p>The Applicant refers to discussions being held with landowners regarding the proposed WCH routes and that this led to design changes being made.</p> <p>Unfortunately, we remain of the view that the Applicant has not provided a fully reasoned response at any stage of the Project as to how they have reached a balanced conclusion in respect of all proposed new routes and how they have considered the implications for landowners and the use and management of their retained land - as submitted by us (and others) during discussions prior to submission of the Applicants DCO application (albeit as submitted these were extremely limited) or in our written and oral submissions to the Examination to date.</p> <p>We would question the reliance of the Applicant on its statement under B.5.7 that there has been regular engagement with landowners and their agents on this issue outside of any formal consultation periods to which there has been limited or no specific response from the Applicant; where issues have been raised.</p> <p>For example, in respect of the submission in B.2.9, whilst it is correct that the Applicant amended the design of the proposed North Road WCH to accommodate a proposed new farm access track entrance, it does not address how they have considered the objection that our client has in respect of the proposal itself.</p> <p>In our opinion and in the absence of a specific considered reasoning for each proposed PROW, the Applicant is not able to demonstrate that they have properly considered the landowner issues in the proposals they have submitted to Examination.</p>

We look forward to working with the ExA and the Applicant to address the above issues.

Yours faithfully



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

Holland Land & Property Limited, 
