

THURROCK FLEXIBLE GENERATION PLANT - DEADLINE 3 SUBMISSION

As an interested party to the examination of the Thurrock Flexible Generation Plant DCO (EN010092) Highways England (20025438) make the following comments at Deadline 3.

1. Protective Provisions

Highways England notes that the Applicant's revised draft Development Consent Order (DCO) submitted at Deadline 2 (REP2-014) includes a placeholder for protective provisions in favour of Highways England at Part 9 of Schedule 9. Highways England will be providing its preferred form of protective provisions and proposed amends to the draft DCO to the Applicant and the parties are working to agree these for inclusion in the draft DCO.

2. Tilbury Link Road (ExQ 1.5.2)

Highways England acknowledges both the Applicant and Thurrock's Council's response to ExQ 1.5.2 and provides the following update as a point of clarification.

The Tilbury Link Road falls under the delivery mechanism of schemes which are identified in the Road Investment Strategy 2 (RIS 2) for delivery in RIS2 or development in RIS2 and delivery in RIS3 subject to meeting the requirements of the Road Investment Strategy.

As stated in the RIS2 document, the Tilbury Link Road is set out to be included within the pipeline for RIS3. This means it is a proposal that Highways England will develop during the RIS2 period (2020 to 2025), so that it could enter construction in the RIS3 period (2025- 2030, with the RIS3 expected to be published in 2024). This will involve the Tilbury Link Road proposal going through the early stages of the development process between now and 2025.

Highways England will continue to work with stakeholders as the Tilbury Link Road progresses.

3. Cumulative effects

Highways England acknowledges that the Applicant has submitted a revised version of Chapter 32: Summary of Cumulative Effects of the Environmental Statement (REP2-029), the updates to which reference the Lower Thames Crossing (LTC) project. Highways England notes that the environmental assessment for the LTC project is ongoing and as such any conclusions made by the Applicant in relation to cumulative effects should be read in conjunction with the conclusions presented in the LTC Environmental Statement, when available.

4. Cultural heritage matters

Highways England note the Applicant has, in response to ExQ 1.4.10, made a statement that the Bowaters Farm HAA Battery was scoped out for assessment by the LTC project. This is not factually correct as from a heritage perspective the monument was scoped in and assessed for impact from both a construction and operation perspective due to changes within its setting.

5. Air Quality

Highways England acknowledges the referencing error made by the Applicant as clarified in ExQ 1.1.17. We note for clarity that the LTC modelled receptor in our air quality assessment is in the vicinity of, but further to the south of the Applicant's receptor 47.

6. Traffic and Transport

ExQ 1.10.4 - Highways England notes the Applicant's Construction Traffic Management Plan and that the Applicant expects that major components of the proposed development (excluding the largest AILs for gas engines and substation transformers) would to be delivered via either the Port of Tilbury or London Gateway (DP World), as set out in paragraph 3.4.21 of Chapter 2 of the Environmental Statement (PDC-015).

Highways England would welcome all abnormal loads to be delivered to the site via the causeway. Please can the Applicant confirm that the use of this causeway is still to be used as it will remove the need for these loads to use the SRN. In addition, we agree with Thurrock Council (para 7.199 of REP2-077) that if a situation were to occur that required abnormal load vehicles to use the highway that these

should be restricted to outside the peak hours of the Port and the SRN so as to not affect the link and junction capacities.

ExQ 1.11.10 – Highways England considers the stated Heavy Goods Vehicle (HGV) movements for the dredged material (estimated as 16 HGV exports (32 HGV movements) per day over a 100 working day period), which have been fully accounted for within the assessment of significant effects, would not have a material impact on the operation and safety of the Strategic Road Network (SGN).

Highways England notes that these HGV movements are included within the trip generation and distribution (i.e. HGV numbers and HGV routeing) estimates and the assessments set out in Section 4.1 of Chapter 10 of the Applicant's Environmental Statement (APP-059) and Sections 6.1 and Section 7 of the Transport Assessment (APP-095).

ExQ 1.17.1 - Highways England notes that the Applicant has considered the use of rail to transport construction material but it is deemed to be unfeasible.

7. Car park planning application (ref 20/01257/FUL)

Highways England set out our position on the car park planning application in response to 1.17.7 in our Deadline 2 response. Highways England requests further clarification on the following points:

- The Raceway Tavern application is for 200 parking spaces but up to 350 workers could be anticipated. How will the Applicant deal with the additional 150 construction workers?
- It is also noted that the construction phasing will not be confirmed until after the DCO Examination has concluded. The temporary car park planning application is for a fixed period of three years. Temporary applications should not be subject to extensions or further applications of a temporary nature. What is the Applicant's strategy for construction worker parking if construction takes place over a three phase six year period?