

(Annex 6 to ABP: 1 of 5 – DL5)

Proposed Lake Lothing Third Crossing (TRO10023)

Associated British Ports (20013261)

**Response to the Applicant's Response on the Justification and Traffic Effects
of draft Scheme of Operation**

1. At Deadline 4, the Applicant submitted the Justification and Traffic Effects of the draft Scheme of Operation Report (Document Reference: SCC/LLTC/EX/60) to support its position as stated in the draft Scheme of Operation ("SoO").
2. ABP notes that it provided specific comments in respect of the draft SoO submitted at Deadline 4, but has not received any response from the Applicant in respect of those comments. To avoid duplication, these comments are not repeated here.
3. Overall, ABP considers that this document fails to justify the SoO, as currently proposed by the Applicant. For this reason, ABP's previous concerns regarding the draft SoO still remain.
4. ABP's comments regarding the Justification Report are as follows.
5. **Paragraph 1.1.6** – ABP disagrees that the provisions in the draft SoO are similar to those set out in 1969 Order. As discussed in ABP's response to the Port Impacts Paper (Document Reference: SCC/LLTC/EX/59), the proposed SoO imposes restrictions that are greater than those envisaged by the 1969 Order, and provides the Harbour Master with less discretion than under the 1969 Order. In addition, the proposed SoO will impose greater length of restrictions during 'peak traffic periods' than has been imposed with respect to the A47 Bascule Bridge for over 30 years.
6. **Table 1 and 2** – These tables confusingly refer to a **5** mins and **10** mins closure in the 2016 base year, whereas the TA also assesses **6** mins and **10** mins closures. These tables also refer to a 2016 Base Year whereas the TA, at Section 7 .3, only considers 2022 base. As such, it is unclear on which assessment the Applicant wants the Scheme to be considered. On that basis, ABP asks that the Applicant provide further

clarity in this regard, so that a proper assessment against consistent standards can be undertaken.

7. **Paragraph 2.4.9** – This seeks to justify the proposed increased restriction of LLTC bridge lifts on the basis that Journey Time Reliability is an objective of the Scheme. As stated in paragraph 1.1.2 of the Justification Report, however, the SoO must strike an appropriate balance between a number of factors, including the statutory duties of ABP and the impact on port users. As such, this section appears to have simply disregarded this balancing exercise.
8. **Paragraph 3.2.2** – As stated above, it is unclear why inconsistent opening times have been applied for the A47 Bascule Bridge and the LLTC Scheme Bridge – noting that the TA also assesses 6 and 10 minute closures. As such, ABP asks that the Applicant provide further clarity in this regard, so that a proper assessment against consistent standards can be undertaken.
9. **Paragraph 3.5.2** – As stated in ABP's response to the Port Impact Paper, there is no justification for the Applicant to assume that the duration of bridge openings would increase as a result of increased Port activity.
10. **Paragraph 3.5.3** – The argument made by the Applicant (i.e. that longer bridge closures will mean longer journey times, and consequently, less reliability) does not amount to evidence that justifies the restrictions stated in the draft SoO. The Justification Report approaches the position in a wholly binary manner and does not properly assess all the benefits and dis-benefits of the proposals. To do that, the Applicant should have assessed all the closure impacts and reviewed that against the Webtag assessment, to determine whether it restrictions imposed still meets the value for money test or not.
11. **Paragraph 4.2.4** – This assessment only partly seeks to justify whether various opening scenarios will impact on BCR. In short, it concludes that the BCR will remain “high” and drop from 3.99 – 3.90 and has the same “reliability” cost for both scenarios. As such, rather than supporting the restrictions set out in the SoO, this analysis completely undermine the Applicant's analysis set out in section 3 of the Justification Report.