

(Annex 7 to ABP: 1 of 5 – DL5)

Proposed Lake Lothing Third Crossing (TRO10023)

Associated British Ports (20013261)

Response to the Applicant's Response on the Western Alternative Report

1. Within Appendix B to the Applicant's Response to Written Representations (Document Reference: SCC/LLTC/EX/51), the Applicant has produced a "Technical Report: Review of central and western bridge options" which purports to review the Central and Western Options in more detail and reconsider the alternatives process in the context of the most up to date information.
2. Regrettably, despite the length of this report, it mainly re-iterates and brings together previous assessments undertaken by the Applicant, on which ABP has already provided its detailed comments.
3. Nevertheless, ABP's comments regarding the Report are as follows.
4. **Paragraph 1.2.9** – ABP considers that both points identified by the Applicant are correct. The 2015 Option Assessment reached wrong conclusion because it did not include proper assessment of costs and that the modelling input to it was not (on the face of it) credible, and the 2018 review was flawed because it did not revisit all of the options.
5. **Table 3** – ABP considers that most of the environmental impacts identified by the Applicant in respect of the Western Option could be avoided – in this regard, ABP notes that Figure 11 provides a more sensible alignment that has previously been suggested by the Applicant. ABP also welcomes the Applicant's acknowledgement that the Western Option is more beneficial for port operations, due to the location and height of the bridge.
6. **Paragraph 1.6.1** – ABP notes that the Applicant refers to paragraph 4.27 of the NPSNN regarding alternatives, however Webtag, Green Book and the EIA Regulations require review of all alternatives, particularly given the significant change in the outcomes of the modelling process and more information on port operations.

7. **Table 8 – Costs** – It is unclear how these costs are derived. As such, ABP requests a breakdown of costs. ABP also notes that the submitted Scheme involves 5 junctions, as opposed to the Western Option only involves 2 junctions – as such, how has this difference impacted on the cost of each alternative?
8. **Paragraph 1.7.8** – Once the £8 million additional cost of the Central Option is taken into consideration (i.e. the total central option cost is £99.74), there is only an overall cost difference of £8 million between the two alternatives. The cost of the Western Option could be significantly reduced, if the design is further refined. It is also unclear whether either of the identified costs includes any provision for mitigation/compensation for ABP. If not, it is clearly the case for mitigation/compensation will be significantly less for the Western Option, given that does not impact on the Port to the extent that the Central Option does – thereby further reducing the cost gap between the two alternatives.
9. **Table 10** - The revised model run confirms two things, firstly that the Western Option has a significant additional benefit on Mutford Lock and that the reduction in flows on Bascule Bridge has doubled since the OAR work. This supports the conclusion that the modelling was incorrect the first time round. It is still not clear from the assessment what inputs we made with respect to closure times of bridges, and ABP requests further information from the Applicant in this regard.
10. **Table 12** – ABP notes that the BCR for the alternatives now much closer and, allowing for additional land costs identified (see paragraph 1.7.35), gives a BCR of 3.63 for the Scheme vs 3.05 for the Western Option.
11. **Paragraph 1.7.37** – Overall, ABP considers that the Western Option would result in a less detrimental impact on port operations than the Central Option.