national highways

Lower Thames Crossing

7.9 Transport Assessment Appendix F Wider Network Impacts Management and Monitoring Policy Compliance

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7.9 Transport Assessment
Appendix F Wider Network Impacts Management and Monitoring Policy Compliance

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1.1 Introduction

1.1.1 Unlike a residential, commercial, or industrial development, which generates traffic, the Lower Thames Crossing would not generate a substantial number of new journeys. By providing alternative and faster route options, it would allow road users to make different decisions about their destinations and the routes they choose. As a result of this, there would be changes in the amount of traffic flowing at many locations across the road network. In many places on the network, and notably at the Dartford Crossing, this would lead to significant beneficial impacts on both journey times and journey reliability. In some locations this change in road user decisions could lead to adverse changes. Overall, the benefits on the road network would outweigh the adverse impacts, and this is reflected in the positive economic benefit of the Project as a whole, and within each affected local authority area. This is set out in the Transport and Economic Efficiency (TEE) analysis as presented in the Economic Appraisal Report (Combined Modelling and Appraisal Report Appendix D – Economic Appraisal Package, Application Document 7.7). Furthermore, while the scheme has significantly greater benefits across the Thames estuary area than disbenefits, this assessment doesn't include a number of transport enhancement schemes in the pipeline (early development) which should they come to fruition will overall add further benefits and network performance improvements.

1.1.2 Alongside the changes in traffic flows that would result from the Lower Thames Crossing are substantial changes in traffic flows arising from other developments that are currently in development across the region. The Project's traffic modelling sets out details of planned developments across the area and how these would increase traffic flows across the network, as demonstrated by the Do Minimum traffic flows set out in the Combined Modelling and Appraisal Report (Application Doc 7.7). Further projects that are not yet developed sufficiently to be explicitly accounted for in the modelling, such as the Thames Freeport proposals, could lead to further increases in flows and it is anticipated that as these proposals develop they will include additional highways investment to address the increased trip generation.

1.1.3 These increased flows require a structured regional approach to the management of investment on the highways network to prioritise funding. National Highways is one of a number of bodies who have the responsibility to manage the road network. The need for specific investments across the network required to respond to the changing in traffic flows needs to be considered in this context. This section sets out how the Lower Thames Crossing proposals conform with the policy requirements set out in the NPSNN and supports the future regional and national planning of investment into the highways network.

1.2 Highway authorities and investment

1.2.1 The road network in the United Kingdom is managed by a series of highways authorities, as set out in the Highways Act 1980. In England, these highways authorities include:

a. a strategic highways company, National Highways, appointed to act as the highway authority for the strategic road network through a license which sets out both statutory directions and guidance (Highways England: Licence, DfT, 2015).

b. The council of a county, county borough or unitary authority are responsible for roads in that county, county borough or council area respectively, that are not part of the strategic road network outside Greater London

c. Transport for London is the authority for all Greater London Authority roads

d. The council of a London borough is the highway authority for roads within its area that are not part of the strategic road network or Greater London Authority roads

1.2.2 The Department for Transport provides both maintenance funding and investment funding for the improvement of the road network at both strategic and, outside Greater London, at a local level. Within Greater London there are different funding arrangements with the government.

1.2.3 Across England, the Department for Transport works with the highways authorities to agree the need for funding and to prioritise investment decisions. This funding framework is set out in the Transport Investment Strategy (DfT, 2017) and is by necessity a balanced approach to the various needs and priorities across the country.

1.2.4 The DfT provides funding to National Highways for the operation of the strategic road network. Under section 3 of the Infrastructure Act 2015, the Secretary of State may establish a Road Investment Strategy. Since the enactment, the Secretary of State has established two Road Investment Strategies covering 2015 to 2020, and 2020 to 2025. The purpose of the Road Investment Strategy is to establish the spending priorities for the Government on the strategic road network. Road Investment Strategies specify the objectives to be achieved by National Highways during the period to which it relates and the financial resources to be provided by the Secretary of State for the purpose of achieving those objectives.

1.2.5 Schedule 2 to the Infrastructure Act 2015 sets out a process for the making Road Investment Strategies. Broadly, the process is described as four “steps”:

a. Step 1: The Secretary of State prepares a proposal for a Road Investment Strategy

b. Step 2: National Highways, as the strategic highways company responsible for the SRN, responds to that proposal

c. Step 3: where the proposals have been agreed between the Secretary of State and National Highways, the Secretary of State may publish the Road Investment Strategy but only if appropriate consultation has taken place.

d. Step 4: where a counter-proposed has been put forward, the Secretary of State may revise the proposals or proceed with their own proposals. The Secretary of State may publish the Road Investment Strategy but only if appropriate consultation has taken place.

1.2.6 During the development of the Road Investment Strategy, the Department for Transport undertakes a process of information gathering and formal consultation on the proposals, including with highways authorities.

1.2.7 Under section 3(6) of the Infrastructure Act, both the Secretary of State and National Highways must comply with the Road Investment Strategy. National Highways' licence, which it must comply with under the terms of the Infrastructure Act 2015, sets out that National Highways must comply with or have due regard to relevant Government policy, as advised by the Secretary of State, with full regard to any implications for National Highways' ability to deliver the Road Investment Strategy.

1.2.8 Road Investment Strategy 2 (2020-2025) includes the Lower Thames Crossing, and also confirms that the Government "recognise that the plans for the Lower Thames Crossing will have an impact on the road networks of Kent and Essex and we will consider what that means for the shape of the SRN in those areas." It also confirms the Government's intention to "investigate linked improvements on the A2 into Kent as part of the pipeline of work for the next RIS.", alongside a series of other road schemes in the region, including the M25 junction 28 upgrade, A2 Bean and Ebbsfleet, and M2 junction 5. Further schemes are in development for the next investment strategy (RIS3 pipeline) including the A2 Dover Access and the A2 Brenley Corner, (see the full list of possible future scheme set out in Table 1.1).

Table 1.1 Proposed pipeline of future schemes (RIS3)

Region	Scheme
North	A19 north of Newcastle junctions
	A64 Hopgrove
	M1 Leeds eastern gateway
	M1/M62 Lofthouse interchange
	M6 junctions 19 to 21a Knutsford to Croft extra capacity
	M1 Junctions 35 to 39 Sheffield to Wakefield extra capacity
	A1 Doncaster to Darlington
	M6 junction 22
	Manchester south-east junction improvements

Region	Scheme
East	A47/A1101 Elm Road junction
	A11 Fiveways junction
	M11 junction 13 Cambridge west
	A12/A14 Copdock interchange***
	A120 Braintree to A12**
	Tilbury link road
Midlands	M6 junction 15 Potteries southern access
	A483 Pant-Llanymynech bypass (in cooperation with the Welsh Government)
	M1 North Leicestershire extra capacity
	M1 Leicester western access
	A5 Hinckley to Tamworth*
South and west schemes	Severn resilience package
	A404 Bisham junction
	A2 Brenley Corner
	A303 Phase 2 upgrade
	A3/A247 Ripley south
	A21 safety package
	A2 Dover Access***
	A27 Lewes to Polegate
	A27 Chichester improvements
	M27 south and Westhampton access***
	A38 Trerulefoot-Carkeel safety package
	A404/M40 junction 4 High Wycombe

**In cooperation with work funded by the Ministry of Housing, Communities and Local Government on the A5 Transport Corridor.*
***The A120 Braintree to A12 proposed timeline is currently being investigated in order to coordinate with the A12 Chelmsford to A120 scheme.*
**** Scheme development supported by the Port Infrastructure Fund.*

1.2.9 Alongside the proposals set out under the RIS programme, National Highways are involved in a number of separate workstreams developing a range of improvement schemes, including:

a. Upgrades to the MRN

   i. A229 Bluebell Hill M2 and M20 junctions

b. Re-assessment of the SRN in response to the Project (led by DfT) -

   i. A13/A1014 trunking

ii. Network-wide review across the South East, assessing trunking or de-trunking options

c. New technologies to improve the performance of the road network -

i. A2/M2 connected corridor project (joint project between the DfT, National Highways, TfL and KCC, part of InterCor, an EU project)

1.2.10 DfT provides funding to highway authorities for roads that do not form part of the strategic road network through a variety of programmes with varied objectives, including supporting economic growth, levelling up, supporting housing delivery, reducing congestion, providing support to the strategic road network, improving safety, and supporting all road users (i.e., considering the needs of cyclists, pedestrians, and disabled people). These funds have supported delivery of several projects in the region, including the A13 widening project and the A127/A130 Fairglen Interchange improvements amongst many other projects.

1.2.11 This context is important in setting out that the investment in the Lower Thames Crossing forms one part of a larger framework of investment funding that delivers improvements in the road network across the region.

1.3 Policy context

1.3.1 To aid the policy assessment, the sections below show the relevant tests that apply to the assessment of the acceptability of transport impacts, based on a thematic approach.

Transport impacts

1.3.2 There are multiple references to congestion in the NPSNN including its adverse effects on quality of life (para 2.16) and the damaging effects of congestion (para 2.21). The NPS also identifies a critical need to improve national networks to address road congestion (para 2.2) and paragraph 3.14 explains that there is need to address current congestion pressures.

1.3.3 There is, however, no specific requirement to propose interventions in response to increased congestion (this is to be contrasted with the position on accessibility and severance (see below)).

1.3.4 Paragraph 5.215 sets out that in the section on ‘impacts on transport networks’ that “Mitigation measures should be proportionate and reasonable, focussing on promoting sustainable transport” and paragraph 5.205 which sets out that consideration should be given to “reasonable opportunities to support other transport modes in developing infrastructure.”

1.3.5 Other relevant policies that have been considered include:

a. Paragraph 111 of the NPPF sets out that "*Development should only be refused on highway grounds if they would be an unacceptable impact on highway safety… or the residual cumulative impacts would be* ***severe.****" The NPPF provides a framework within which locally-prepared plans for housing and other development can be produced.* There is no policy requirement for intervention, mitigation, or refusal in relation to a loss of capacity or an increase in journey times.

b. The NPS for Ports confirms the government seeks to "*encourage sustainable port development to cater for long-term forecast growth in volumes of imports and exports by sea with a competitive and efficient port industry capable of meeting the needs of importers and exporters cost effectively and in a timely manner, thus contributing to long-term economic growth and prosperity*" (NPS for Ports, paragraph 3.3.1).

Severance and Accessibility

1.3.6 Paragraph 5.206 of the NNNPS sets out that "the applicant should provide evidence that as part of the project they have used reasonable endeavours to address any existing severance issues that act as a barrier to non-motorised users".

1.3.7 Paragraph 5.216 sets out that "Where a development would worsen accessibility, such impacts should be mitigated as far as reasonably practical. There is a very strong expectation that impacts on accessibility for non-motorised users should be mitigated."

Environmental

1.3.8 Paragraph 5.207 of the NPSNN sets out that "If a project is likely to have significant transport impacts it should include a Transport Assessment, using the TAG methodology stipulated in Department for Transport guidance, or any successor to such methodology. If a development is subject to EIA and is likely to have significant environmental impacts arising from impacts on transport networks, the applicant's environmental statement should describe those impacts."

Safety

1.3.9 Paragraph 4.64 of the NPSNN sets out that promoters of highway NSIPs "will wish to show that they have taken all steps that are reasonably required to:

a. minimise the risk of death and injury arising from their development;

b. contribute to an overall reduction in road casualties;

c. contribute to an overall reduction in the number of unplanned incidents; and

d. contribute to improvements in road safety for walkers and cyclists."

1.3.10 Paragraph 4.65 also refers to how the safety implications of a project have been considered from the outset; and how there are rigorous processes for monitoring and evaluating safety.

1.4 Compliance with policy - Operational transport impacts

1.4.1 The operational transport impacts have been forecast using the Project's transport model. This modelling and the forecast impacts on traffic are measured in the form of increased and decreased journey times, which can then be quantified as an economic benefit or disbenefit. The aggregated benefits and disbenefits then show whether there would be an overall benefit or disbenefit associated with the new connectivity provided by the changes to the road network. The traffic modelling allows for the assessment of this economic benefit to road users who start their journeys in each local authority area, and separately for those who end their journeys in each local authority area. This information is presented in the Transport and Economic Efficiency analysis as presented in the Economic Appraisal Report (Combined Modelling and Appraisal Report Appendix D – Economic Appraisal Package, Application Document 7.7). This analysis demonstrates that all directly affected and nearly all regional local authorities show a benefit both for journeys that start and end in the authority areas, and when journeys that start and/or end in the authority area are combined, then all authority areas benefit on an individual basis.

1.4.2 The Transport Assessment (Application Document 7.9) assesses and reports the outcome of traffic assessments prepared by National Highways by considering the nature of the changing traffic flows at the level of individual roads and junctions. As a change in flow is not directly correlated with network performance and may not result in a noticeable change in network performance (an increase in flow if the link is operating well below capacity will not affect journey times), the volume to capacity measure was used to assess the impact of traffic flow changes on the performance of the network. Chapter 7 sets out the operational impacts of the Project, identifying the areas of beneficial and adverse impact, as set out in Plates 7.25 to 7.36. It confirms that there will be major, moderate, and minor beneficial impacts at a large number of locations across the region, both on the strategic road network, and on the wider road network. The assessment also shows that there will be some major, moderate, and minor adverse impacts, also located both on the strategic road network, and on the wider road network. The economic analysis demonstrates that the adverse impacts are significantly outweighed, both on a local authority level and when aggregated, by the beneficial impacts. The Scheme Objectives confirm that one of the key purposes of the Project is to relieve the congested Dartford Crossing and approach roads. Chapter 7 of the Transport Assessment (Application Document 7.9) confirms that there is a moderate beneficial impact on the crossing itself, and major beneficial impacts on the approach roads, including both the direct approach roads to the crossing, and junctions 30 and 2 of the M25, and junction 31, 1a and 1b of the A282.

1.4.3 The traffic forecasting demonstrates that there would be increased traffic on selected local junctions and roads, leading to increased journey times at those locations. However, the impact on an individual road user needs to be considered from the perspective of the aggregated journey time impact on their entire route. Chapter 7 of the Transport Assessment (Application Document 7.9)

also sets out the aggregated journey time changes for a few key journeys across the region, with more comprehensive information included as Appendices B and C. In many cases, the forecast adverse impacts would be offset by the wider journey time benefits which, for many users travelling through these locations, would be incurred elsewhere along their route. This assessment shows that while there may be adverse impacts along some sections of a road users' journey, any overall adverse impact on the journey time would be small. For example, although there are moderate adverse impacts forecast along stretches of the A13 located to the east of the Lower Thames Crossing, for a common journey along the length of the A13, from the junction with the A127 to the M25 the road user would encounter a marginal (less than one minute) delay in the eastbound direction, and a faster journey time in the westbound direction. In some cases, there are adverse impacts on journey times. For example, there are major adverse impacts on the intersection between the A229 and the M20, and the modelling indicates that these would result in an increase of the journey time along the A229, between the M2 and the M20, of up to two minutes. Where these impacts occur, there is potentially a case for further investment on the road network, and at this location Kent County Council are currently developing a Strategic Outline Business Case seeking DfT funding due to the existing traffic flows at this location (the A229 Bluebell Hill Improvement Scheme).

1.4.4 The traffic forecasts identify that there would be, in some locations, adverse impacts on traffic flows. The traffic flows resulting in these adverse impacts are a combined outcome of changes in the routing decisions made by road users following the opening of the new section of road network, and an increase in the number of journeys made through the construction of new developments. Chapter 4 of the Traffic Forecasts Non-Technical Summary (Application Document 7.8) sets out the new developments that have been accounted for in the development of the Project's transport model. Chapter 5 of the same document then reports the volume of traffic as a percentage to the capacity of the road network (volume/capacity). This clearly sets out, in Plates 5.10 and 5.14, how the forecast growth effects include several areas of congestion across the road network. As further developments are brought forward, if no mitigation is assumed, this will further increase traffic flows, and lead to further impacts on journey times. The combination of forecast and non-forecasted future development creates a level of uncertainty over what, if any intervention would be necessary. Furthermore, the likely scale, approach and cost of such measures cannot be detailed at the current time.

1.4.5 Over time, it will be very difficult to demonstrate that traffic flow changes on the road network were solely as result of the Lower Thames Crossing and not other factors such as wider demand for travel, nearby new development, or changes in the way the road network was managed. As such National Highways consider it appropriate that the existing framework for managing the road network, as set out above, remains the appropriate way to make decisions about future investment priorities.

1.4.6 National Highways does recognise that the Lower Thames Crossing would lead to changes in traffic flows at several locations and acknowledges the National Highways licence obligations under paragraph 5.19 of the Highways England: Licence (Department for Transport, 2015) to work with local highway authorities

and others to align national and local plans and investments, balance national and local needs and support better end to end journeys for road users. National Highways will continue to deliver against this obligation in its collaborative work with local authorities, and to support this, work has been undertaken to develop an operational traffic impact monitoring scheme, to be substantially in accordance with the Wider Network Impacts Monitoring and Management Plan (Application Document 7.12). The purpose of this monitoring scheme is to monitor the impacts of the Project and other changes on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network because of traffic growth or new third-party developments, then highways authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes. Many locations across the existing road network have strong cases for intervention now, and others have strong cases in the future as demonstrated by the traffic flows forecast in a scenario without the Lower Thames Crossing (the Do Minimum scenario reported in the Traffic Forecasts Non-Technical Summary (Application Document 7.8)). At some of these locations, the monitoring will strengthen local authorities' case-making to central government for schemes to be developed.

1.4.7 Having regard to the consideration of sustainable transport, alongside the use of the road network by private cars and commercial vehicles, congestion can be relieved by the provision of road-based public transport, including both local buses and regional coach services. National Highways has taken account of the traffic forecasts in the development of the proposals and ensured that there is capacity on the proposed new road to accommodate future sustainable transport proposals including the provision of new local and regional road based public transport services by relevant organisations. In addition, local buses are exempted from paying the road user charge, reducing their cost of operation, as set out in the Road User Charging Statement (Application Document 7.6) and the draft Development Consent Order (Application Document 3.1).

1.4.8 Considering specifically the impact on the connectivity to the ports, the Lower Thames Crossing would enhance the resilience of the strategic network and provide better connections between local ports and the wider strategic road network. Specifically:

a. the DP World London Gateway port would benefit from the provision of a new direct free-flowing route connecting the A13 east of the Lower Thames Crossing to the M25 south of junction 29 and the A2 / M2 corridor. This would reduce journey times for vehicles using these routes. While there are moderate adverse impacts identified on the A13 close to the connection with the A1014 that connects to the port, traffic passing through this section is anticipated to largely be heading further west into London on the A13, or north onto the M25, and so would have either marginal increases of less than one minute, or more substantial improvements in their overall journey times.

b. the Port of Tilbury would benefit from the provision of direct new free-flowing connections from the A1089 northbound onto the Lower Thames

Crossing, from where traffic can travel on to the M25 at junction 29 and the A2 / M2 corridor. This would reduce journey times for traffic using these routes. While no new direct and free-flowing connectivity is provided for traffic heading from the M25 southbound towards to Port of Tilbury, the relief to the M25 at junction 30 and the reduction of traffic on the A13 to the west of the Lower Thames Crossing means that journey times along this route would also decrease.

1.4.9 The improved journey times between the Port of Tilbury and London Gateway port and a number of locations are set out in the Combined Modelling and Appraisal Report – Appendix C Transport Forecasting Package (Application Document 7.7)

1.4.10 In summary, National Highways has considered the forecast impacts of the Project on traffic flows through appropriate modelling and considers that the overall benefit delivered by the new connectivity means that these impacts are acceptable in the terms of the NPS, NPPF or other relevant policy. The impacts on ports are considered to be strategically beneficial and compliant with the NPS for Ports, paragraph 3.3.1.

1.4.11 While there is no specific requirement in the NPSNN to meet a certain criterion for impacts on the transport network, nevertheless, the assessments demonstrate that where there are adverse impacts on traffic flows, National Highways considers that there would be beneficial impacts that outweigh these adverse impacts, and that there is a suitable framework in place, via the Department for Transport's investment strategy, to allow for consideration of any future need for further interventions on the road network on its merits in fair and open competition with other submissions nationally or locally. The Lower Thames Crossing would create significant opportunities for new public transport routes to be set up using the road network. Therefore, National Highways considers that the Lower Thames Crossing proposals are compliant with the requirements of the NPSNN.

1.5 Compliance with policy - Severance and Accessibility

1.5.1 The increased traffic flows on selected links could result in a severance effect, as residents are separated from community facilities and the services they use within their community. Equally, reduced flows on some routes could significantly enhance connectivity. Links with increased traffic flows that could lead to a severance impact were identified in Plate 7.43 of the Transport Assessment (Application Document 7.9). Both a health outcomes assessment and an equality impact assessment have been undertaken on these links, considering the potential impacts of severance, and is presented in the Health and Equalities Impact Assessment (Application Document 7.10). This assessment found that:

a. In the majority of locations where there would be increased severance as a result of changes in traffic flow, this is unlikely to have an adverse impact on health and wellbeing. This is due to factors such as the presence of existing pedestrian links and crossings, or alternatively where the existing

pedestrian environment is such that severance is not likely to be an issue (for example rural roads with no pavements or nearby amenities/facilities).

b. For several locations – notably Elaine Avenue (Strood), Brennan Drive (Tilbury) and Valley Drive (Gravesham) – it is considered that further investigation may be required into the potential for improving pedestrian crossing provision.

1.5.2 The assessment, and the associated mitigation, as set out in the Health and Equalities Impact Assessment (Application Document 7.10) and secured via the Section 106 Agreements Heads of Terms document (Application Document 7.3) together demonstrate compliance with Paragraph 5.206 of the NPSNN and show that the proposals are compliant with Paragraph 5.216 of the NPSNN.

1.6 Compliance with policy - Environment

1.6.1 Changes in traffic flows can have consequences on environments and receptors located near to the wider road network. To assess these impacts, the traffic forecasts have been used in the preparation of the environmental assessments reported in the Environmental Statement. The approach to the development of these data is set out in Section 9 of the Combined Modelling and Appraisal Report – Appendix C Traffic Forecasting Package (Application Document 7.7). The approach to assessing this information within the Environmental Statement is set out in general in Appendix 4.4 of Chapter 4 – EIA Methodology (Application Document 6.1) and then more specifically in the relevant topic assessments.

1.6.2 The Environmental Statement sets (Application Document 6.1) out the impacts, identifies the significant environmental impacts that arise from the impacts of the Lower Thames Crossing on the road network. This assessment demonstrates the project compliance with paragraph 5.207 of the NPSNN.

1.7 Compliance with policy – Safety

1.7.1 The consideration of safety through the development of the Lower Thames Crossing is set out in Section 9 of the Transport Assessment (Application Document 7.9). This document sets how the design of the Project has followed National Highways' design standards as set out in the Design Manual for Roads and Bridges (DMRB), and that the preliminary design has been subject to a stage 1 road safety audit (RSA).

1.7.2 Increases in traffic flows away from the new road may also result in changes in the frequency and nature of accidents. To assess this, a collision analysis has been undertaken, also reported in Section 9 of the Transport Assessment (Application Document 7.9). This analysis reports changes in the number and nature of collisions at a number of links. While increases in traffic flows may lead to an increase in the frequency of accidents, increased traffic is not the sole cause of a change in the collision analysis. A reduction in traffic flows may lead to increases in vehicle speed and so an increase in the severity of incidents. This analysis must, therefore, be considered in aggregate. The analysis concludes that there would be a reduction in the accident rate per million vehicle km across the 60-year appraisal period, and in both the Opening

Year, 2030, and the design year, 2045. While there is an overall increase in the number of accidents over the period, this is a result of the increase in vehicle kilometres travelled as people choose to take different journeys because of the improved journey times on the existing network and the newly available routes.

1.7.3 The Transport Assessment (Application Document 7.9) also sets out the collision history on roads located close to the proposed route. While in certain locations there are historic accidents that coincide with the identified increases in traffic flows, it should not be concluded that the increase in traffic flows would lead to a reduction in safety at these locations. There are many causal factors that influence accidents, and while highways design and traffic flows are a factor, so are local factors such as driver behaviour, highways orientation and recent contributing factors such as oil spills.

1.7.4 Following the opening of a major project, such as the Lower Thames Crossing National Highways undertakes a Post-opening project evaluation (POPE). Amongst other aspects, this includes an assessment of the extent to which our projects achieve their safety objectives and contribute to the provision of a safe network for road users.

1.7.5 Each highway authority has the responsibility for the safety of their network. Where accident cluster sites are identified, funding is available from the DfT to support the relevant highway authority with improving the network at that location.

1.7.6 National Highways considers that the analysis undertaken demonstrates compliance with Paragraph 4.64 of the NPSNN.

1.8 Conclusion

1.8.1 National Highways has considered the effects of the Project in the context of the NPS and other relevant policy.

1.8.2 While the effects include adverse impacts on traffic flows on some parts of the network, resulting from road users taking advantage of the new routes and reduced journey times, these are outweighed by the beneficial impacts resulting from improved traffic flows elsewhere, at both a local and regional level.

1.8.3 As set out above, there are existing statutory and funding mechanisms which are in place specifically to address and support improvements across the road network, where these are considered necessary. National Highways has not sought to use the process for obtaining a Development Consent Order under the Planning Act 2008 to substitute the existing process which allows the Government to operate a transparent funding process, which can fairly consider requests for intervention and investment locally on a par with the way in which other projects which may be unrelated to Project are considered. This allows the Secretary of State to make decisions based on the merits in the context of government policy and government spending priorities. The existing system is fit for purpose and should not be set aside by this or any other DCO application.

1.8.4 National Highways recognises that, as a result of the Lower Thames Crossing opening, people will choose to make different journeys. In many places on the network this will lead to beneficial impacts on the network, and in some cases will lead to adverse impacts. Overall, the benefits on the road network

significantly outweigh the adverse impacts, and this is reflected in the positive economic benefit of the project. National Highways has assessed the wider network impacts of the Lower Thames Crossing project and has considered these against the requirements set out in the National Policy Statement for National Networks (DfT, 2014), and considers that the adverse impacts are acceptable under this policy.

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