



## Application by National Highways for Order Granting Development Consent for the Lower Thames Crossing

### Summary of Written Representation on behalf of DPWLG

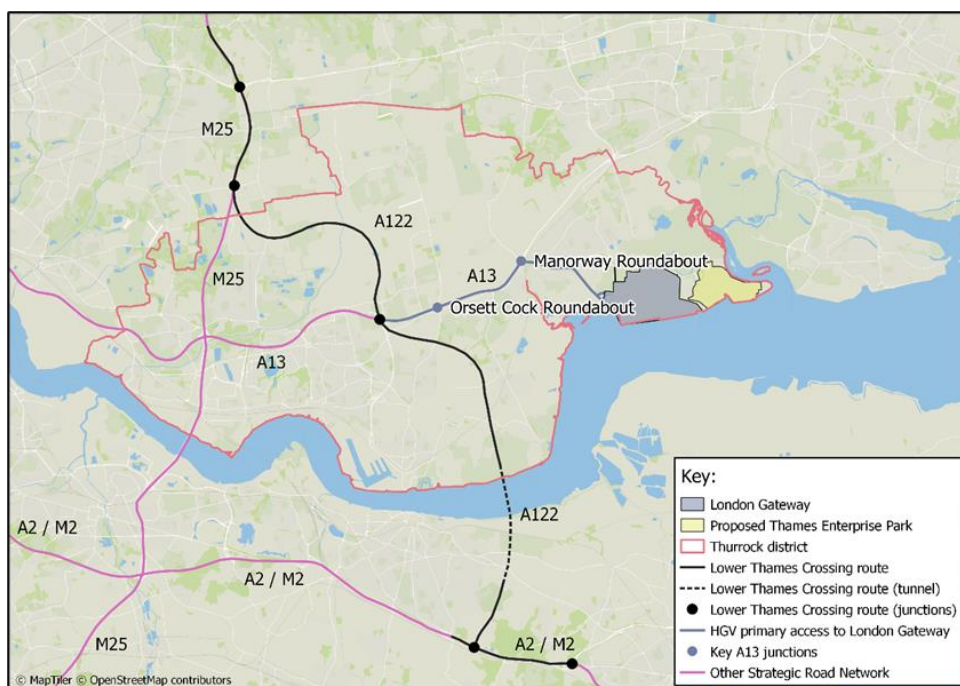
Interested Party Ref: 20035309

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These Written Representations are submitted on behalf of London Gateway Port Limited, LG Park Freehold Limited and LG Park Leasehold Limited (collectively referred to as ‘DPWLG’), who are the owners and operators of DP World London Gateway Port (the Port) and DP World London Gateway Logistics Park (the Logistics Park). The Port and Logistics Park are separately and collectively of national significance and importance.

Whilst DPWLG have no in-principle objection to the Lower Thames Crossing (‘LTC’) Project, they have significant concerns in relation to the induced congestion and substantial increase in unreliable travel times that would arise at the A13/A128 Orsett Cock Junction and A13/A1014 Manorway Junction (‘the Orsett Cock and Manorway junctions’) as a direct result of the LTC Project. The Manorway Junction is the sole access route to the Port and Logistics Park and is critical to its operations.

The Port and Logistics Park are located on the north bank of the River Thames at Stanford-le-Hope, Essex. The plan below shows its location (shaded grey) in relation to the LTC Project, as well as the location of Orsett Cock and Manorway junctions.





The information submitted by the Applicant is insufficient in relation to the assessment of the Orsett Cock and Manorway junctions and the consequential impacts on the Port and Logistics Park as a direct result of the LTC Project. As such, DPWLG has commissioned the following technical reports:

- Written Representations in relation to Traffic Impact Assessment undertaken by DTA Transportation Ltd. ('Transport Report') (Annex A of Written Representation);
- Written Representations in relation to Economic Impact undertaken by Volterra ('Economic Impact Report') (Annex B of Written Representation).

These reports provide an indicative assessment (based on information available to date) of the transport and economic impacts of the LTC Project on the operations of the Port and Logistics Park.

## **PRINCIPAL ISSUES**

Based on our review of the DCO submission and the findings of the above technical reports, we raise the following key concerns regarding the LTC Project:

- i) The Applicant has not satisfactorily assessed the congestion and capacity issues at the Orsett Cock and Manorway junctions. In this respect, the Applicant has not provided local modelling data in relation to the junctions and has not considered circumstances where the Dartford Crossing (QE2 Bridge) is suffering significant congestion or is closed to traffic;
- ii) The findings of DTA's Transport Report shows that the LTC Project, as proposed, would have a significant adverse impact on the highway network and junctions serving the Port and Logistics Park;
- iii) The induced congestion and increased delays at the Orsett Cock and Manorway junctions would have consequential impacts on the operation of the Port and Logistics Park, as well as adverse knock-on effects for hauliers and end users. This has not been considered by the Applicant within the DCO submission.
- iv) The mitigation measures proposed by the Applicant in respect of the Orsett Cock and Manorway Junctions (i.e. ongoing monitoring) are insufficient and unacceptable.

## **PLANNING POLICY ASSESSMENT**

The LTC Project, as proposed, fails to accord with the relevant guidance of the NPS for National Networks (2014) and NPS for Ports (2012), specifically:

- i) The Applicant has relied upon strategic highway modelling (LTAM) that does not provide the level of detail and accuracy at local junctions to allow the ExA and SoS to give proper consideration to the impacts on the local transport network that serves



the Port and Logistics Park, as required by paragraph 5.211 – 5.212 of the NPS for National Networks;

- ii) The LTC Project fails to provide ‘*proportionate and reasonable*’ mitigation measures required by paragraph 5.215 – 5.217 of NPS for National Networks;
- iii) Without appropriate mitigation, the LTC Project would undermine the competitiveness and resilience of the Port which would be conflict with the Government’s policy for ports as set out at paragraphs 3.4.13 – 3.4.15 of NPS for Ports;
- iv) In considering the wider public benefits of the LTC Project against its adverse impacts (in line with paragraph 4.3 of NPS for National Networks), careful consideration must be given to the adverse impacts that would occur at the Orsett Cock and Manorway junctions in relation to the safe and efficient operation of those junctions, and in respect of the consequential impacts on the Port and Logistics Park. This should be considered in the context of the poor/ low benefit-cost-ratio (BCR) of the LTC Project, together with the policy protection afforded to maintaining the competitiveness and resilience of national ports (NPS for Ports).

Compliance with the relevant NPS guidance can only be achieved if the impacts on the Orsett Cock and Manorway junctions are fully assessed and mitigated such that the operation of the Port and Logistics Park is not undermined by congestion and journey time increases caused by the LTC Project.

## **PROPOSED MITIGATION**

The DTA Transport Report concludes (based on additional transport assessment work) that further assessment of the Orsett Cock and Manorway junctions is required to determine whether and what type of mitigation measures are required to alleviate the significant adverse impacts identified. Schematic concept plans for each junction showing potentially suitable mitigation measures are provided within the Transport Report. However, these mitigation measures could be avoided altogether if a direct link to the Tilbury area from the LTC was provided as part of the Project.

The Economic Impact Report indicates that appropriate mitigation measures (such as those shown in the schematic concept plans) would strengthen the case for the LTC Project and deliver good Value for Money (‘VfM’) for the taxpayer. However, irrespective of VfM considerations, there is clear strategic rationale for delivering mitigation proposals given the importance of maintaining the resilience of access to the Port and Logistics Park, in line with national policy objectives.

It is considered that the proposed mitigation measures could be secured via a Grampian type condition, which would prohibit the LTC Project coming into operation, until the necessary mitigation works required at the Orsett Cock and Manorway junctions have been completed.