



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

**DEADLINE 2**

Comments on Local Impact  
Reports

on behalf of DPWLG

Interested Party Ref: 20035309

AUGUST 2023

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**1.0 COMMENTS ON LOCAL IMPACT REPORTS (DEADLINE 2) ..... 2**

## 1.0 Comments on Local Impact Reports (Deadline 2)

### 1.1 Introduction

1.1.1 Lambert Smith Hampton ('LSH'), on behalf of DPWLG, have undertaken a targeted review of the Local Impact Reports ('LIR') submitted to the Examination Authority ('ExA') at Deadline 1 (18<sup>th</sup> July 2023). Based on our review and focussing on matters of relevance to DPWLG's case, these comments consider LIRs submitted by the following local authorities:

- Essex County Council;
- Thurrock Council.

### 1.2 Essex County Council

1.2.1 The LIR submitted by ECC aligns with DPWLG's case in relation to the following matters:

- ECC indicate in-principle support for the LTC scheme whilst seeking to ensure it does not result in significant adverse impacts on the highway network;
- ECC opposes the lack of connection between the A13 Westbound and LTC and at Orsett Cock (albeit they will not make any further representations through the DCO process as they acknowledge it is within the Thurrock boundaries). These omissions in the scheme go to the heart of capacity concerns raised by DPWLG;
- ECC have requested mitigation by National Highways for negative traffic impacts identified on the wider road network;
- ECC oppose the lack of a junction at Tilbury (although they request, as a minimum, some form of assurance to revisit in a future round of the RIS, particularly in the context of the Thames Freeport).

1.2.2 It is noted that the analysis of modelling work undertaken by ECC and SYSTRA concludes that the proposed LTC is *'not expected to have any unacceptable impacts to the ECC Highway Network, subject to implementation of the mitigation proposals set out in the submitted Transport Assessment documents'*. It is noted that ECC's conclusions are based solely on consideration of the LTAM model. and should additional information be submitted during the course of the examination, ECC will wish to review this and amend their comments, if necessary. For the reasons set out in our Written Representations, DPWLG consider the LTAM model outcomes significantly under-estimate and / or mask impacts from the scheme.

### 1.3 Thurrock Council

1.3.1 The LIR submitted by Thurrock Council aligns with DPWLG's case in relation to the following:

- The Council considers that the modelling assessment provided by the Applicant is inadequate and potentially underestimates impacts on the Local Road Network (LRN).
- The Council notes that the design of LTC provides limited access to national port facilities;
- The Council notes that Thames Freeport growth is likely to be subject to the need to upgrade the Manorway roundabout, which itself is impacted by LTC;
- The Council has a significant issue with assumptions adopted in the Strategic Traffic Modelling work (LTAM) with the lengthy progression and the subsequent refusal to submit the local traffic modelling within the DCO submission to the ExA.
- The Council requires microsimulation modelling for the Orsett Cock and Manorway junctions (amongst others) to determine precise impacts and potential need for mitigation;
- The Council highlights (as do DPWLG) that there are significant differences between the two modelling techniques that have been undertaken to date (LTAM and Microsimulation) that requires reassessment of the scheme;
- The Council is opposed to the proposal to require the Council to apply for future funds to mitigate the effects of LTC on local roads, which may not be successful;
- The Council considers that the Applicant has not had regard to recent investment by Thurrock Council and DP World/London Gateway (DPWLG) on the un-trunked section of A13 associated with the continued growth of London Gateway port and the anticipated development growth within Thurrock.

1.3.2 In addition to the above, we note and support the following comments by Thurrock Council:

- **Reference to the reliability of data underpinning the current traffic model as a result of construction delays** – DPWLG supports the following statement at para 7.8.11 of the LIR:

*'The current traffic model is underpinned by data which dates from 2016. With the scheme opening now delayed until 2032, this data predates the opening year by 16 years and needs updating. It also predates the pandemic and other major events, which have resulted in changes to travel behaviour and reduced demand for travel and which will significantly affect the assessment of LTC presented in the DCO. The Council considers that the traffic modelling*

*supporting LTC does not represent an up-to-date or representative view of current conditions and leads to the benefits of the scheme being overestimated.'*

- **Reference to the lack of detail with the Applicant's Planning Statement regarding NPS for Ports (2012)** – DPWLG supports the following statement at para 4.4.3 of the LIR:

*'There is no detail within the Planning Statement ..... with regards to how the LTC project is in accordance with the NPS for Ports, which was published 28 February 2012. Part of the project could have significant impacts on Port of Tilbury or indeed DP World/London Gateway port. Details are required on how the LTC project will ensure Tilbury Docks and DP World/London Gateway (now both part of the Thames Freeport) can continue to promote economic growth through improving networks and links for passengers and freight and to strengthen the safety and security of transport'.*

- 1.3.3 DPWLG note that Section 9.6 and Appendix C set out the Council's required amendments to key elements of the LTC scheme design to mitigate local impacts. These include (amongst other things) providing a simple and appropriate scale design for the interchange between LTC / A1089 /A13 and the Orsett Cock junction to resolve the Council's concerns over safety, severance, delay, congestion, land take and traffic reassignment.
- 1.3.4 DPWLG notes that the Council objects to the current proposals for LTC as the scheme fails to strike an acceptable balance between national benefit and the substantial harm to the Borough. It is DPWLG's view that the future prosperity of the Borough in economic and social terms depends very substantially on the continuing resilience and success of the Freeport (including Port of Tilbury and DPWLG).
- 1.3.5 DPWLG have no comments in relation to other matters raised in Thurrock Council's LIR regarding environmental and health impacts, utilities, employment etc.