



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

DEADLINE 2

Comments by Interested
Parties on the Applicant's
Amended Proposed ASI
Itinerary

on behalf of DPWLG

Interested Party Ref: 20035309

AUGUST 2023

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1.0 Comments on the Applicant's Amended Proposed ASI Itinerary

1.1 Introduction

1.1.1 A draft itinerary for Accompanied Site Inspections ('ASI') to the ports is provided at Appendix A of the Applicant's Amended Proposed ASI Itinerary. This is based, in part, on a Draft ASI Itinerary provided to the Applicant by DPWLG.

1.1.2 Whilst a draft itinerary for the ports has been provided at Appendix A, it is noted that paragraph 1.1.6 states that the Applicant has not currently included specific visits to the ports within the main itinerary. In this respect, the Applicant highlights Guidance on the Draft Site Itinerary (PD-019) issued by the ExA following Procedural Deadline C, which states:

'The ExA is able to view the port accesses and the surrounding network from the public highway as a USI. In light of the matters raised in the representations from DP World and PoTLL, the ExA has yet to see a clear justification for making a more detailed site visit to the ports. Relevant considerations would include the location and capacity of freight handling facilities and queueing areas for HGVs – and any effects on the highway network of these. PoTLL is requested to provide a revised submission at Deadline 1 identifying those facilities for which an ASI is required. DP World London Gateway is requested to make a submission on the same basis.'

1.1.3 We acknowledge that a separate submission setting out a justification for a more detailed site visit to the ports was not provided at Deadline 1 and set out the reasons for this below.

1.1.4 DPWLG's submission at Procedural Deadline B, prior to Preliminary Hearing on 6th June 2023, recommended that the ExA Panel should undertake a site inspection of the Port and Logistics Park at London Gateway. Oral submissions were also made at the Preliminary Meeting. An extract of these oral submissions and the response from Mr Smith of the ExA Panel, as recorded in the meeting transcript (EV-011), is provided below:

MR SHADAREVIAN KC (on behalf of DPWLG): *Thank you. As you know, we have requested an accompanied site visit to the Port and Logistics Park. It's very important that you see these things in operation in order to understand the relationship of the relevant junctions and the way in which these two vital facilities perform. We have requested that you go on an accompanied site visit. When or how would you like this to be organised, as part of this programme?*

MR SMITH (ExA): *We've set out deadlines in the timetable for, obviously, responses to the applicant's initial programme. And the best way to carry this forward – we already have your request. We have also indicated that we will be producing a document and amending the timetable to provide guidance to the applicant on finalisation of the accompanied site inspection programme. So taking all that into account, you don't need to reiterate your requests, so you don't need to put anything in, as I see it, other than – one trusts the applicant are taking your request into account. I think we can give our old guidance here, which is that we favour your request. We note why it has been made. Ports are very substantial pieces of un-footloose infrastructure. It's important that we understand the implications of a substantial change to a road network on the operations of a port and the junctions that serve it. So in principle, that's a yes. So let's throw that back to the applicant, see if they can make it fit, and we would also encourage you to have direct party-to-party conversations with the applicant. And if you've got a specific view about the numbers of hours and the practicalities – meet here, go there – don't wait for the applicant to guess and then respond afterwards. Make contact with them with a proposal and then, hopefully, they can reflect that as soon as possible, rather than the other way around. And we will, of course, take a view then, finally, on what we see. But yes, I don't think there's any likely prospect that we will be declining to undertake that requested inspection.*

1.1.5 As advised, following the Preliminary Meeting, DPWLG met with the Applicant on 19th June 2023 and subsequently provided a Draft ASI Itinerary for the Port and Logistics Park at London Gateway. Based on the advice provided at the Preliminary Hearing Meeting, it was considered that this was sufficient in respect of Deadline 1.

1.1.6 Following our review of the Amended Proposed ASI Itinerary, we set out below written justification for an accompanied site inspection of the Port and Logistics Park at London Gateway.

1.2 Justification for an Accompanied Site Inspection of London Gateway Port And Logistics Park

1.2.1 Our Written Representations and supporting technical reports submitted at Deadline 1 illustrate that increased congestion at Manorway Junction (as a result of the Proposed LTC Project) would result in internal disruption on the operations of the Port and Logistics Park at London Gateway. These operational impacts are set out in detail in Section 4.2 of the Economic Impact Report (Annex B of our Written Representation) and are summarised below:

- As a result of unreliable travel times (caused by the Proposed LTC Project) HGVs are more likely to miss pre-booked drop-off or collection slots at the Port.
- This creates the inefficiencies for the internal operations of Port as the arrangement of the stack of containers at the Port is predetermined, with the container that the HGV is receiving being at the top of the stack.
- When an HGV does not arrive within its allocated booking slot, container stacks must be continually rearranged using what are called “unproductive crane movements”. This is as opposed to productive crane movements which move containers onto HGVs (and vice-versa).
- A high percentage of crane movements being unproductive causes inefficiencies for the Port and has knock on delays for Truck Turnaround Times (‘TTT’ – the total amount of time between the HGV arriving at and exiting the main gate of the Port), because HGVs have to wait whilst the stack is being rearranged to retrieve their container.
- This in turn creates inefficiencies for the hauliers as they are prevented from arriving within their allocated booking slots and are required to rearrange a new slot. Dependent on the usage levels of the Port, hauliers may have to wait several hours before a new slot is available.

1.2.2 Whilst the operation of the Port is set out in our Written Representation, it would be beneficial for the ExA to undertake an ASI to gain a full understanding of the scale, complexity and interdependencies of the operations of the Port and Logistics Park and how they relate to and rely upon the local highway network. Furthermore, given the emphasis placed upon maintaining the resilience and competitiveness of national ports within the NPS for Ports (2012), the ExA must give careful consideration to the adverse consequential impacts that would occur at the ports without appropriate mitigation of the LTC Project. It is, therefore, critical that accompanied site inspections of the ports are included within the ASI Itinerary to ensure the ExA has a full understanding of the Port’s operations and how they would be impacted by the proposed LTC Project without mitigation.

1.2.3 In terms of specific facilities within the Port for which an ASI is required, DPWLG suggest the following:

- Internal access infrastructure;
- Gate complex;
- Container stacks (and associated handling equipment);
- HGV/stack interface; and
- Shipside/stack interface.

- 1.2.4 DPWLG also propose a brief (driven) tour of the logistics park to provide an understanding of the scale of implemented/ proposed development.

- 1.2.5 Aside from the above, DPWLG have no comments to make regarding the content of the Draft Site itinerary at Appendix A.