



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

DEADLINE 2

Comments on Applicant's
Submissions

on behalf of DPWLG

Interested Party Ref: 20035309

AUGUST 2023

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1.0 Initial Comments on Applicant's Submissions (Deadline 2)

1.1 Initial Comments on '9.15 Localised Traffic Modelling Report'

1.1.1 Whilst we intend to provide a more detailed response at Deadline 3 (see below – 1.2), we set out below our initial comments on the Localised Traffic Report as part of our Deadline 2 Submission.

1.1.2 The Localised Traffic Modelling Report contains a significant amount of new information which has not been previously made available and will take some time to review. At this stage a preliminary review confirms that nothing in the modelling report changes the concerns raised in our Written Representations as summarised at Paragraph 1.11 of the DTA Traffic Impact Report (Appendix B of our Written Representations).

1.1.3 The modelling presented in Section 4 for Orsett Cock purports to confirm that the assumptions in the local junction modelling are consistent with those in the LATM model. The approach is flawed for a number of reasons:

- (i) It includes different input flows than the model outputs previously provided (and presented in Appendix B and F of the DTA report). The input files suggest a different version of the LTAM model has been used and that version is different from the one on which the whole DCO application is based. Clearly it is essential to understand what those differences are and why the applicant now seeks to rely on a new model version for the testing.
- (ii) The modelling explicitly seems to exclude U-turning traffic at Orsett Cock. As described at Paragraph 2.2.7 of the DTA report, a significant number of additional U-turning movements are forecast at Orsett Cock as it provides the sole route for traffic from the LTC (North and Southbound to the A1089). There is no assessment of these movements or implications of them in Tables 4.4 – 4.7.
- (iii) The previous modelling demonstrated a significant level of latent demand (Paragraph 2.2.11 of the DTA report). There is no assessment of the effects of that latent demand in the Localised Traffic Modelling Report and therefore the results must significantly under-estimate delay at the junction, making the comparison meaningless.

1.1.4 Clearly if these errors persist then little weight can be given to the conclusions of the report and the interactions of conditions at Orsett Cock, creating issues at Manorway must therefore also persist.

1.1.5 DPWLG, Thurrock Council and Essex County Council have invited the Applicant to meet with them before Deadline 3 (in order to inform all parties' detailed responses which are being prepared for this Deadline) to discuss the Localised Traffic Modelling Report and its Appendices and to understand its assumptions, analysis and conclusions (as opposed to submitting a list of queries/requests for clarification prior to Deadline 3). We await the Applicant's response to this request.

1.2 Justification for Further Submissions on Highways Matters to be Provided at Deadline 3

1.2.1 DPWLG will provide further detailed submissions at Deadline 3 (24th August 2023) in relation to the additional information which was submitted by the Applicant at Deadline 1 (9.15 Localised Traffic Modelling Report and Appendices) in accordance with the request detailed below.

1.2.2 Further information submitted by the Applicant was uploaded to the Planning Inspectorate's website on 26th July 2023 (a week after Deadline 1). This additional information included the Localised Traffic Modelling Report (and associated appendices), which is of utmost relevance to DPWLG's case.

1.2.3 Given the late submission of the modelling information by the Applicant and the significant amount of time that will be required to undertake an appropriate assessment of the data, it was not possible for DPWLG to provide any meaningful technical response by Deadline 2 (3rd August 2023). As such, LSH wrote to the Planning Inspectorate on 27th July 2023 to seek an extension of time in relation to the assessment of information provided at Deadline 1 and received the following response on 28th July 2023 from Ryan Sedgman (Case Officer):

'While we cannot offer an extension, either personal or across the board to Deadline 1, we do request that you make your submission in response to these documents at Deadline 3 instead. While this will class as a late Deadline 2 submission, under the circumstances, the Examining Authority (ExA) can take this into consideration, at their discretion, when reviewing it at Deadline 3'.

1.2.4 In line with the above advice, DPWLG is undertaking a thorough assessment of the Local Traffic Modelling Report and will submit a more detailed response at Deadline 3. As noted above, DPWLG

(along with Essex County Council and Thurrock Council) have proactively sought a meeting with the Applicant to discuss the findings of report as a means of assisting the examination.