

Principal Areas of Disagreement Summary Statement [\(Updated 24th August 2023\)](#)

Lower Thames Crossing – TR010032

London Gateway Port Limited, LG Park Freehold Limited and LG Park Leasehold Limited (collectively referred to as DP World London Gateway (DPWLG))

Number	Principal Issue in Question (PIQ)	SOCG Reference	The brief concern held by DPWLG which will be reported on in full in Written/Oral Representations	What needs to; change, or be included, or amended so as to overcome the disagreement	Likelihood of the concern being addressed during Examination
1	Transport Impact Assessment – Insufficient assessment work on local highway junctions	Table 2.1, Item 2.1.1 & 2.1.3	The impact at the A13/A128 Orsett Cock junction and the A13/A1014 Manorway junction has not been fully or properly assessed within the submission documents. These junctions are located on a critical route to the DP World London Gateway Port (the Port) and Logistics Park (the Park), consequently a full understanding of the transport impact on this local highway network is required.	<p>The Transport Assessment needs to be updated to consider the impact at both the A13/A128 Orsett Cock junction and the A13/A1014 Manorway junctions. This work specifically needs to consider the detail of the junction operation in a suitable package (ie Microsimulation) rather than be based on the wider conclusions of the LATM model as currently presented in the application.</p> <p><u>The Applicant submitted further information at Deadline 1 (Report Refs: REP1-187, REP1-189 and REP1-190) which includes the results of microsimulation modelling at the A13/A128 Orsett Cock junction and the A13/A1014 Manorway junction. However, this does not address the key areas of</u></p>	<p>We see no reason why this information cannot be provided, and the matter addressed at Examination. <u>However, given the extent of outstanding information, DPWLG have concerns whether this information will be provided in time to allow proper consideration during Examination.</u></p> <p>The impact of the LTC cannot be fully assessed until this information is provided.</p>

				<p>concern. Notably, it highlights the inadequacies of and inconsistencies with LTAM. Following a meeting with the Applicant on 16th August 2023, further information has been requested by DPWLG, Essex County Council and Thurrock Council and NH have undertaken to provide that information. This includes the creation of new models to address concerns raised.</p> <p>The assessment This information is needed to identify suitable mitigation solutions provided to prevent accessibility and operational issues to the Port and Park. The mitigation solutions can be agreed but the means by which they should be secured, if found to be necessary, is a matter for further consideration.</p>	
2	Transport Impact Assessment – Lack of detail on other connected transport networks	Table 2.1, Item 2.1.1 & 2.1.3	The Transport Impact Assessment does not consider the traffic impacts during (planned/ unplanned) closures of the Dartford Crossing. The closures occur frequently and would create further congestion implications	<p>The Applicant has not submitted any additional information. As such, this issue remains outstanding.</p> <p>The Transport Assessment needs to be updated to consider and assess the implications of anticipated Dartford Crossing closures (based on robust</p>	We see no reason why this information cannot be provided, and the matter addressed at Examination. The impact of the LTC cannot be fully assessed until this information is provided.

			along the A13 (specifically at junctions A13/A128 and A13/A1014) once the LTC is operational. The A13 is a critical route to the accessibility of the Port and Park.	evidence of the frequency this event occurs), and the congestion impacts on local highways once the re-routing of traffic during such events occurs. Suitable mitigation solutions should be provided to prevent accessibility and operational issues to the Port and Park. The mitigation solutions can be agreed but the means by which they should be secured, if found to be necessary, is a matter for further consideration.	
3	Likely significance of impacts	Table 2.1, Item 2.1.2	Increased traffic on the A13 (specifically at and in the vicinity of the junctions noted above) will likely result in significant adverse traffic impacts for the Port and Park.	The Applicant has not submitted any additional information. As such, this issue remains outstanding. Following the completion of suitable Traffic Assessment (as discussed in Items 1 and 2 above) to robustly assess the significance of identified impacts	We see no reason why this information cannot be provided, and the matter addressed at Examination. The impact of the LTC cannot be fully assessed until this information is provided.
4	Economic Impact Assessment – Insufficient	Table 2.1, Item 2.1.2	The congestion on the A13 highway (specifically at the A13/A128 and A13/A1014 junctions) as a	The Applicant has not submitted any additional information. As such, this issue remains outstanding.	We see no reason this information cannot be provided, and the matter addressed at Examination.

	assessment of the impact on the operations of the Port and Park and other NSIPs		result of the proposed LTC has the potential to constrain operations at the Port and Park and consequently create negative economic impacts. These impacts have not been considered as part of the submission documents.	An Economic Impact Assessment, which considers the net benefits and net negatives of the proposed LTC for the Port and Park, needs to be undertaken once the further Transport Assessment work is provided (Items 1 and 2 above), as this will detail the operational impacts.	The impact of the LTC cannot be fully assessed until this information is provided.
<u>5</u>	<u>Policy Assessment – Insufficient consideration and assessment of relevant national and regional policy documents.</u>	<u>N/A</u>	<u>The Applicant has failed to properly consider relevant national and regional policy, namely NPS for Ports (2012), the UK Marine Policy Statement (2011), and the South East Inshore Marine Plan (2021), despite the potential for the LTC Project to impact adversely on the Port and Logistics Park at London Gateway.</u>	<u>The Applicant should provide an assessment of the scheme against the relevant national and regional policy documents in an 'Accordance Table' as an addendum to document '7.2 Planning Statement'.</u> <u>It is noted that these documents were considered as 'important and relevant considerations' during the Examination of the Thanet Extension Offshore Wind Farm DCO application. As such, there is precedent to consider these documents in cases where a DCO application has the potential to affect the operations of major ports.</u>	<u>We see no reason this information cannot be provided, and the matter addressed at Examination.</u> <u>The impact of the LTC cannot be fully assessed until this information is provided.</u>