national highways

Lower Thames Crossing

9.88 Post-event submissions, including written submission of oral comments, for OFH4

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Please note: this document contains the Applicant's written summary of oral submissions made at Open Floor Hearing 4 held on 6 September 2023, and post-hearing comments in response to submissions made by Interested Parties. Where the comment is a post-hearing comment submitted by National Highways, this is indicated.

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1 Introduction

1.1.1 National Highways (the Applicant), which is promoting the A122 Lower Thames Crossing (the Project), was represented at Open Floor Hearing 4 (OFH4) by Tom Henderson, BDB Pitmans LLP, Partner (TH).

1.1.2 The Interested Parties in attendance were:

a. John Purkiss, Chairman of the WELCOM Forum (West & East Tilbury and Linford Community Forum)

b. John Thacker

c. Simon Johnson

d. Paul Cole

1.1.3 In addition, Gordon Pratt, Managing Director of Thames Gateway Tramlink, who is not an Interested Party, attended and was granted permission to speak by the Examining Authority (ExA).

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2 Submissions from John Purkiss, WELCOM Forum

2.1.1 **Post-hearing note**: The table below contains the written responses the Applicant wishes to submit in response to comments made by John Purkiss, Chairman of the WELCOM Forum representing East Tilbury, West Tilbury, and Linford (**JP**) during OFH4.

JP comments made at OFH4	Applicant's response
JP stated that LTC would be tunnelling through an old landfill site where there have been toxic lagoons in the past. The Silvertown tunnel uses 260,000 litres of water per day on their tunnelling machine. Concerns raised about water pressure being reduced for local residents, if similar amounts of water are used. There are no new reservoirs being built. Can LTC guarantee that water pressure will not be compromised? The Silvertown tunnel also brings slurry out to other lagoons and uses the slurry in landscaping. JP was concerned that the slurry from the toxic lagoons should not be re-used. JP also wanted confirmation of where the water and slurry will go when the work is finished.	The water supplied to the tunnel boring machinery shall be groundwater abstracted from a Northumbrian Water Limited owned borehole at Linford and provided through a pipeline to the site (Work No MUT6). Extraction rates would be agreed with Northumbrian Water prior to commencement of main tunnelling works and the supply of groundwater would be within the limits of the existing groundwater abstraction licence (Environmental Statement (ES) Appendix 2.2: Code of Construction Practice (CoCP) [**REP3-104**] Register of Environmental Actions and Commitments (REAC) RDWE003). This supply to the tunnel boring machine (TBM) via Work No MUT6 would be raw water. In the eventuality that this water supply would not be available, potable water can be supplied via a pipeline that forms part of the permanent water supply to the North Portal building via Work No MU29. In both instances, it is envisaged that there would be no impact to the existing potable water supply for residents and customers within the region, however any associated risk regarding this, i.e. rupturing of a water pipeline, or the TBM supply being 'turned off' to meet demands of others due to unforeseen circumstances such as drought, is significantly reduced via the use of raw water. The demands in both instances have been discussed and confirmed with Essex & Suffolk Water, who are the operating company of Northumbrian Water Limited in this region and have a statutory duty to ensure water resources are adequately managed. This engagement shall continue during the detailed design, planning and construction of the Project. The interests of Northumbrian Water Limited are protected via the Protective Provisions as contained within Schedule 14, Part 1 of the draft Development Consent Order (DCO) [**REP3-077**]. Separately there is a supply for potable use for the construction compounds (Work No CA5 and Work No CA5a). This is proposed to be sourced

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JP comments made at OFH4	Applicant's response
	from the existing water network within Station Road (Work No. MUT9). For completeness, a supply of potable water for the associated tunnelling construction compound south of the River Thames (Work No CA3) would be sourced from the existing water network within the A226 (Work No MUT3) which is owned and operated by Southern Water Services Limited. The interests of Southern Water Services Limited are protected via the Protective Provisions as contained within Schedule 14, Part 1 of the draft DCO [**REP3-077**]. No water for the purposes of the TBM would be provided from the south of the river. There would be no adverse impacts on local communities, noise or the water environment as a result of pumping water along pipes to the tunnels. Best Practicable Means (REAC Ref. NV007 [**REP3-104**]) as defined under section 72 of the Control of Pollution Act 1974 would be employed during the construction phase to reduce noise and vibration nuisance. These would include measures such as using silenced equipment where available, in particular silenced power generators and pumps, and installing and maintaining hoarding around the construction areas likely to generate noise. RDWE004 [**REP3-104**] secures a commitment to use water efficiently during construction, citing examples: water-efficient fittings (taps, toilets) in site offices and welfare facilities, use of misting/atomising systems for dust suppression, drive-on recirculating systems for wheel washing, and sub-metering to help in detecting leaks. Further information on the tunnel construction works is provided in ES Chapter 2: Project Description [**APP-140**]. The Applicant would refer Mr Purkiss to those hearing recordings (7 September 2023) and further submissions provided as part of Issue Specific Hearing 5 (ISH5): Tunnelling, submitted at Deadline 4 [**Document Reference 9.85**]. In response to the comment that the Project is '*tunnelling through an old landfill site where there have been toxic lagoons in the past*' the Applicant confirms that this is not the case. No works are proposed at the East Tilbury Landfill, where liquid wastes were historically deposited. Following early engagement with the Environment Agency, the Applicant has taken

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JP comments made at OFH4	Applicant's response
	appropriate steps to limit activities within the boundary of the East Tilbury Landfill and implemented a design that seeks to avoid cross-boundary, indirect effects on the landfill site. The Project has included provision for a temporary access at its northern end, however, the design and use of which (in terms of number of movements and type of vehicles) would be subject to agreement with the Environment Agency prior to its installation in line with Project commitment GS020 in ES Appendix 2.2: Code of Construction Practice [**REP3-104**]. For the wider Project, the Applicant confirms that where excavated materials and soils are to be reused, recycled and/or recovered within the Order Limits this would be subject to the relevant regulatory controls. For example: Environmental Permit (as per the Environmental Permitting (England and Wales) Regulations (2016)), exemption; and/or a Materials Management Plan (as per the Definition of Waste: Development Industry Code of Practice (CL:AIRE, 2011)). All excavated materials and soils proposed for reuse would be required to meet risk-based acceptability criteria applicable to their intended use to ensure they are suitable for use and do not lead to adverse impact of contamination (ES Appendix 2.2: Code of Construction Practice [**REP3-104**] REAC MW007 and GS006).
WW2 bombs were dropped along the River Thames and JP is not sure LTC have marked all bombs left in the vicinity. What is the procedure if unexploded bombs are discovered?	The Unexploded Ordnance (UXO) Desk Study and Risk Assessment is presented as Appendix 10.10 of the Environmental Statement [**APP-433**]. It presents the UXO hazard assessments, hazard zone plans and recommended risk mitigation techniques. That assessment concludes that the overwhelming majority of unexploded ordnance poses a 'low risk', and that there are no examples of any 'high' or 'very high' risks identified. That assessment makes a number of recommendations for the limited areas which are identified as a 'moderate risk'. ES Chapter 10: Geology and Soils paragraph 10.5.8p [**APP-148**] includes mitigation as follows: *'Pre-construction risk assessments and an emergency response procedure for the management of UXO prior to construction are detailed within the CoCP [**REP3-104**]. The Contractors would carry out pre-construction risk assessments to determine the possibility of finding UXO within the construction area. An emergency response procedure would be prepared and implemented by the Contractors to respond to the discovery of UXO. This would*

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JP comments made at OFH4	Applicant's response
	include notifications to the relevant local authorities and emergency services.' Section 6.11 of ES Appendix 2.2: Code of Construction Practice [**REP3-104**] states: *'6.11.1 The Contractors will carry out pre-construction risk assessments to determine the possibility of finding unexploded ordnance within the construction area. An emergency response procedure will be prepared and implemented by the Contractors to respond to the discovery of unexploded ordnance. This will include notifications to the relevant local authorities and emergency services.* *6.11.2 The Contractors will comply with the recommendations of the Appendix 10.10: Unexploded Ordnance Desk Study and Risk Assessment* [**APP-433**].' The CoCP [**REP3-104**] Section 6.9: Emergency preparedness includes the requirement to include procedures in the event of the discovery of unexploded ordnance.
There would have been less opposition to the Project if the proposed road had been kept underground for longer at East Tilbury and Linford to alleviate pollution. The north portal location is based on linking to Tilbury2. There appears to have been a leaning towards financial decisions over decisions for the people.	During the development of the Project, the Applicant and the Department for Transport (DfT) considered various options carefully with regards to how each would contribute towards the Scheme Objectives agreed with DfT. The Scheme Objectives are set out in the Need for the Project [**APP-494**]. Public consultations have been carried out at appropriate points during the Project's development. The Applicant has considered reasonable route alternatives to the Project, and these are detailed in ES Chapter 3: Assessment of Reasonable Alternatives [**APP-141**]. More information about the decision-making process that led to the identification of the preferred route can be found in Section 5.4 of the Planning Statement [**APP-495**], with information about the subsequent design development in the Project Design Report [**APP-506** **to** **APP-515**].
Silvertown tunnel has 38 air monitoring systems, how many are there for the LTC Project? There is a prevailing westerly wind, dust and smog from Tilbury Port as it is, let alone with additional vehicles. If the road was in a tunnel for longer, there would be no issue, but as the road is above ground there are concerns.	The '*38 air monitoring systems*' for the Silvertown Tunnel Scheme refer to the 38 diffusion tubes installed across five London Boroughs to monitor Nitrogen Dioxide (NO_2) pre and post scheme opening as part of the monitoring and mitigation strategy in the Development Consent Order[1].

[1] Silvertown Tunnel DCO (2018) https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-002295-180510%20Silvertown%20Tunnel%20Order%20-%20Final%20-%20Validated.pdf

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JP comments made at OFH4	Applicant's response
	The Applicant has set out in REAC commitment AQ006, as part of ES Appendix 2.2: Code of Construction Practice [**REP3-104**], that the Contractor will use a risk-based approach to determine the level of air quality monitoring required during construction, having regard for the specific packages of work to be undertaken and their proximity to receptors around the site. It is not practical to develop this detailed monitoring strategy at present and confirm number of monitoring locations ahead of the development of the detail of the work to be undertaken on each specific site. Hence the commitment for the air quality monitoring programme to be subject to approval by the Secretary of State (SoS) in consultation with the relevant local authorities to ensure appropriate scrutiny when the requisite information is available. During construction of the Lower Thames Crossing, the Applicant has identified measures for Contractors to follow that would ensure that construction phase dust and exhaust emissions are controlled. The REAC, which forms part of the CoCP [**REP3-104**], outlines the construction dust mitigation measures that will be implemented by the Contractor. These are detailed in REAC commitments AQ001 to AQ005 and include measures to prevent, reduce and suppress any dust emissions. Dust monitoring and inspection would be undertaken to ensure that the mitigation measures remain effective during the construction works; this is summarised in AQ006 to AQ008 of the REAC. Following adoption of these measures, there are expected to be no significant air quality effects as a result of construction dust and emissions from the construction plant. Modelling of operational phase road traffic impacts on air quality concluded that impacts on human health receptors are not significant, therefore no mitigation is required. DMRB LA 105[2] states that air quality monitoring of road traffic pollution (for example nitrogen dioxide, NO_2) shall not be required for projects that do not require mitigation. This is because monitoring would only be necessary where time-limited mitigation is implemented, in order to demonstrate when and if the mitigation measure(s) could be removed.

[2] Highways England (2019). Design Manual for Roads and Bridges (DMRB), LA 105 Air Quality.

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3 Submissions from John Thacker

3.1.1 **Post-hearing note**: The table below contains the written responses the Applicant wishes to submit in response to comments made by John Thacker (**JT**) during OFH4.

JT comments made at OFH4	Applicant's response
The LTC has been proposed to ease traffic, but how will this be done with the proposed junctions to be built in Orsett and Brentwood? How fast can lorries really turn in these junctions? The congestion on the M25 is already high at specific roundabouts, this Project will only add to it. If roads close down, then surrounding roads will be overloaded and traffic will not be reduced. Please can there be an explanation of whether these junctions are really being tested and the flow of traffic through them looked at?	The Project would include junctions with key parts of the strategic road network (SRN), such as the A2/M2, A13/A1089 and M25. It would also provide connections to a number of local roads via the junctions at Orsett Cock in Thurrock and at Gravesend East. When the Lower Thames Crossing opens for traffic it is forecast to reduce traffic on the Dartford Crossing by an average of 19% in the peak hours, as set out in the Transport Assessment [**REP3-112**, **REP3-114** and **REP3-116**]. Even after the Lower Thames Crossing has been open for 15 years, traffic levels using the Dartford Crossing are still predicted to be an average of 13% lower in the peak hours than in the Do Minimum scenario. The forecast relief to the Dartford Crossing has been derived from the Project's transport model, which has been built in line with DfT's Transport Analysis Guidance. Further information can be found in the Traffic Forecasts Non-Technical Summary [**APP-528**]. The Applicant's transport model covers in detail the roads in Kent, Thurrock, Essex and Havering, as well as the eastern part of Greater London, extending out to major roads within the area around the entire M25, and including a wider road network that extends across the whole of England, Scotland and Wales. This area is appropriate because it models all of the primary roads likely to be affected by the Project. The Applicant has designed the junctions, as with all parts of the Project, in line with the Design Manual for Roads and Bridges. The speed limits that will apply at the junctions will, in general, be in line with that of the A122 mainline. Typically this would therefore be 70mph, but vehicles would be expected to use the links and junctions at an appropriate speed, as is common across the road network. The Applicant also notes, as set out in Section 9.2 of the Transport Assessment [**REP3-112**, **REP3-114** **and** **REP3-116**], that the Project is

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JT comments made at OFH4	Applicant's response
	subject to the standard Road Safety Audit processes. The Project is forecast to provide relief to some sections of the M25, between junctions 2 and 29, which includes the Dartford Crossing and M25 junction 30. However, as shown in the Traffic Forecasts Non-Technical Summary [**APP-528**] the M25 to the north of M25 junction 29 is forecast to see an increase in traffic. Overall, the transport benefits of the Project clearly and significantly outweigh the negative impacts on the road network, with the Project fulfilling the Scheme Objective to relieve the congested Dartford Crossing and approach roads, improving their performance by providing additional free-flowing north–south capacity across the River Thames. For more information about the Scheme Objectives, see the Need for the Project [**APP-494**]. While there would be negative impacts on traffic flow in some locations, the Applicant considers that no additional interventions are necessary beyond the proposals presented in the application for development consent.
If it takes 10 years for the Project to open, will it go over budget? Will it be out of date by the time it is built? Will more lanes be put in?	The Project is forecast to open in 2032, following the Written Ministerial Statement on 9 March 2023. The forecast cost of the Project used within the economic appraisal is set out in Table 4.4 of Combined Modelling and Appraisal Report Appendix D: Economic Appraisal Package – Economic Appraisal Report [**APP-526**]. This cost (£8,083m) was assured by the Applicant in February 2022 (see paragraph 6.2.3 of the same document). The Applicant considers that the forecast cost of the Project is robust and represents value for money (the central case Benefit Cost Ratio (BCR) is 1.22 – as set out in Combined Modelling and Appraisal Report Appendix D: Economic Appraisal Package – Economic Appraisal Report [**APP-526**]). As noted at paragraph H.2.5 of Post-event submissions, including written submission of oral comments, for Issue Specific Hearing 1 (ISH1) [**REP1-183**], a 100-year appraisal of the Project (given its expected life is longer than 60 years) shows that the Adjusted BCR increases to between 1.66 and 1.72, depending on the assumptions relating to the

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JT comments made at OFH4	Applicant's response
	implementation of the Transport Decarbonisation Plan. The Applicant has assessed the performance of the Project up to 2051 (shorter than its expected design life, but the final year of the Department for Transport traffic forecasts), and outputs are presented in Chapter 7 of the Transport Assessment [**REP3-112**, **REP3-114**, **REP3-116**] and the Combined Modelling and Appraisal Report Appendix C: Transport Forecasting Package [**APP-522**]. The Applicant has no proposals to add additional lanes to the design submitted with the DCO application.

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4 Submissions from Simon Johnson

4.1.1 **Post-hearing note:** The Applicant awaits the full list of questions in writing from Mr Johnson at Deadline 4 and will respond to them at Deadline 5.

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5 Submissions from Paul Cole

5.1.1 **Post-hearing note**: The table below contains the written responses the Applicant wishes to submit in response to comments made by Paul Cole (**PC**) during OFH4.

PC comments made at OFH4	Applicant's response
Something needs to be done to address the congestion at the Dartford Crossing and PC asked whether the Project really addresses congestion? The design capacity calculates 135,000 vehicles per day, which is regularly exceeded. Despite a 75% increase of lanes planned, there will only be a 19% decrease in traffic in the first year so the capacity will still be exceeded in the opening year. The levels of peak flow were unacceptable in 2016 and these levels will be reached again by the mid-2030s. The roads are congested by northbound traffic leaving the M25 and diverting via the A229. The Project at the moment is in the wrong location for the demand. The Project does not sufficiently relieve traffic flow at the existing crossing. Congestion is listed fourth in the Scheme Objectives, when surely it should be the primary objective? Increasing resilience is listed fifth. PC was unable to find the modelling information but assumed the congestion and impact of closures must have been modelled to show the impact. Has the data been run and where it is? It doesn't take a model to see that diverted traffic could be chaotic, with long and awkward diversions. Is this really adding resilience? These proposed spaghetti junctions are not the best arrangement and confusing for drivers. There are circuitous and long slip roads which will dominate the landscape in that area. Also, this will still not ultimately provide complete connectivity with the major road network. As a keen runner and walker, the routes along Green Lane, etc. are some of the few areas in Thurrock where people can escape from the traffic noise. This will be lost if the Project is built as currently designed. PC is not opposed to increasing the capacity but thinks the Project will not result in a reduction in congestion.	When the Lower Thames Crossing opens for traffic it is forecast to reduce traffic on the Dartford Crossing by an average of 19% in the peak hours, as set out in the Transport Assessment [**REP3-112**, **REP3-114**, **REP3-116**]. Even after the Lower Thames Crossing has been open for 15 years, traffic levels using the Dartford Crossing are still predicted to be an average of 13% lower in the peak hours than in the Do Minimum scenario. To understand the performance of the Dartford Crossing, in scenarios with and without the proposed A122 Lower Thames Crossing (i.e. the Do Minimum and Do Something scenarios) the journey time benefits and the journey time reliability benefits provide the means to understand the changes in traffic flows arising from the proposed new road, and to assess whether the proposed new road would continue to provide relief to the Dartford Crossing into the future. The benefits arise from both a reduction in the total number of vehicles using the Dartford Crossing and from changes in the journeys and types of traffic using the crossing. The Applicant provided further detail on this matter in Annex A.2 of Post-event submissions, including written submission of oral comments, for ISH1 [**REP1-183**]. The Applicant does not consider that under normal traffic conditions traffic would leave the M25 and travel on the A229, as the relieved Dartford Crossing would remain the quickest route. In relation to the Scheme Objectives (see the Need for the Project [**APP-494**]), these are not set out in an order of importance; the Applicant has developed the Project with regard to each. The Need for the Project sets out the Applicant's consideration of how the Project meets each of the Scheme Objectives. Details relating to the Project's transport model and its outputs are set out in the Combined Modelling and Appraisal Report [**APP-518**], its appendices [**APP-519** to **APP-527**] and the

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PC comments made at OFH4	Applicant's response
The cost of the proposal, in terms of money and a loss of the natural environment, is too high a price for a road in the wrong place.	Transport Assessment [**REP3-112**, **REP3-114**, **REP3-116**]. The Applicant has not undertaken assessment of incidents on the road network, however in relation to the impact of incidents, the Applicant has provided a response to this matter within Comments on Written Representations Appendix G – Parish Councils, Organisations and Groups [**REP2-052**] in response to Thames Crossing Action Group (page 156). The Applicant has sought to minimise the impact of the junctions within the landscape and mitigation is outlined in the Project Design Report Part D [**APP-509**, **APP-510** **and** **APP-511**]. The provision of links within the junctions have been identified to achieve the Scheme Objectives. The Project design has sought to incorporate noise mitigation by means of earthwork features where practicable. Where earthworks measures were not practicable, additional mitigation has been identified in the form of acoustic fencing and low noise road surfacing. These noise mitigation measures are presented in ES Figure 12.6: Operational Road Traffic Noise Mitigation [**APP-314**]. As set out above, the Applicant has considered the Project against the Scheme Objectives and has set out how the Project complies with local, regional and national policy within the Planning Statement [**APP-495**] (see also Planning Statement Chapter 5: Project evolution and alternatives). The Applicant considers that the Project represents value for money (the central case BCR is 1.22 – as set out in Combined Modelling and Appraisal Report Appendix D: Economic Appraisal Package – Economic Appraisal Report [**APP-526**]). As noted at paragraph H.2.5 of Post-event submissions, including written submission of oral comments, for ISH1 [**REP1-183**], a 100-year appraisal of the Project (given its expected life is longer than 60 years) shows that the Adjusted BCR increases to between 1.66 and 1.72, depending on the assumptions relating to the implementation of the Transport Decarbonisation Plan.

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6 Submissions from Gordon Pratt

6.1.1 **Post-hearing note**: The table below contains the written responses the Applicant wishes to submit in response to comments made by Gordon Pratt (**GP**) during OFH4.

GP comments made at OFH4	Applicant's response
GP was in attendance as Managing Director of Thames Gateway Tramlink (**TGT**), a cross-river tramway. They submitted their outline business case 2–3 years ago. Due process has been completed, reviewed by UK Tram and they have been encouraged to move onto the full business case. TGT were approached by Arriva, who were running a fast-track bus service in North Kent and having issues with congestion. Arriva wanted to support TGT and saw that the tramway would reduce congestion on the Dartford Crossing. It was estimated that there would be a 10% reduction in congestion with the tramway. Geographically, there are jobs on one side of the river and people on the other, so TGT would be a good idea. The Census showed that less than 50% of households had access to cars. New properties (e.g. Albion Waterside development) were being built with one parking space between two properties. The road crossing doesn't help these residents. Three to four years ago, TGT were approached by the LTC team and spoke to them about adding a tramway underneath the road deck. They could not put a heavy rail connection in that form. TGT had to pass the opportunity as the cost of using the 4km long LTC tunnels was not viable and the tunnel didn't get passengers where they needed to be, town centres. This is just a summary of where TGT are currently. TGT are not sure where representatives for local public transport operators are. 50% of the local population need public transport.	The Applicant met with TGT in November 2018 and again in May 2022, before the submission of the DCO application for the Project. In 2018, the Applicant provided technical information to TGT about the gradients and location of the tunnel portals. As Mr Pratt has stated, this allowed TGT to conclude that it is not viable to use the tunnel because it does not meet their locational requirements. As set out in Section 5.3 of the Planning Statement [**APP-495**], the role that other transport modes might play in addressing congestion at the Dartford Crossing has been considered from the outset. The provision of new passenger rail or light services crossing of the River Thames as an alternative to a road crossing is also not considered to be a viable or realistic alternative as set out in paragraph 5.3.16 of the Planning Statement [**APP-495**]. Alternatives to the Lower Thames Crossing were considered in a study in 2009 commissioned by DfT. The Applicant reconsidered the road and rail public transport solutions in 2017 in response to the public consultation and concluded that none had the capability of solving the identified strategic traffic problem and meeting the Scheme Objectives. Strategic options were revisited as part of the 2022 options reappraisal, which confirmed that the decisions made remain valid. For further details refer to Section 3.6 and Section 3.9 of ES Chapter 3: Assessment of Reasonable Alternatives [**APP-141**]. Further information is provided in Annexes E.9 and B.2: Rail Alternatives of Post-event submissions, including written submission of oral comments, for ISH1 [**REP1-183**]. The Applicant recognises the opportunity to, and importance of, improving sustainable transport provision across and along the river, but as complementary measures to the Project which provides the infrastructure improvements that can facilitate measures. By providing the north–south connection and junction improvements, the whole of the

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GP comments made at OFH4	Applicant's response
	Project route will be accessible to local and longer distance public transport routes, if operators choose to make use of it. The Applicant considers that local authorities are best placed to lead on the development and appraisal of future public transport projects across the river. The Applicant has established a Sustainable Transport Working Group in parallel to the Project, with the purpose of maximising the benefits of the new crossing. Should the Project gain consent, the Applicant will use the Sustainable Transport Working Group up until the Project opening as a forum to engage with local authorities and operators and develop improvements to existing and potential new services to make best use of the opportunities provided by the new crossing. The Project presents an opportunity to provide new bus services across the River Thames between North Kent and Thurrock/South Essex, improving public transport connectivity. The positive impact would extend to the Dartford Crossing which is forecast to see journey time reliability increase, and journey times reduce as a result of the Project. The whole of the Project route is accessible to local and longer distance public transport routes if operators choose to make use of it. Similarly to the Dartford Crossing, registered local bus services would be exempt from charging when using the new crossing. Forecast changes to public transport journey times are reported in Section 7.11 of the Transport Assessment [**REP3-112 to REP3-116**]. These show that overall, the Project would have a benefit to public transport services in the Lower Thames area.

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7 Applicant comments in light of submissions at OFH4

7.1.1 TH thanked the Interested Parties for their contributions and noted that this was not a forum for the Applicant to put their case. The Applicant would be responding to the oral submissions made at Deadline 4 (19 September 2023) and any post-hearing summaries of submissions entered at Deadline 4, by Deadline 5 (3 October 2023).

7.1.2 TH noted that all responses would, therefore, be put in writing [**post-hearing note:** these are set out in the tables above], but, for the record, TH made the following comments at the hearing itself:

a. On tunnelling matters raised by Mr Purkiss, TH signalled that there would be a tunnelling hearing (ISH4) on 7 September 2023. The Applicant would be able to address all of the points raised by Mr Purkiss.

b. On Mr Johnson's questions, the Applicant would be happy to respond to these. Many of those questions are already addressed in the application and subsequent submissions, and the Applicant would signpost to those. The Applicant would wait to receive Mr Johnson's questions in writing at Deadline 4 and the Applicant would then respond at Deadline 5.

c. TH noted the Applicant's case is directly contrary to the points made by Mr Cole. In terms of the Scheme Objectives, these are not weighted, none is treated as more important than another. On a point of detail, TH highlighted that the Scheme Objectives are set out in the Need for the Project [**APP-494**] and these list the transport objectives first and, indeed, the objective of congestion relief at Dartford first of all. This acknowledges the point that the Lower Thames Crossing is a transport scheme.

d. In terms of Mr Pratt's points, the Applicant's position is that a tram-based intervention would not meet the objectives of the Project.

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8 Next steps and closing

8.1.1 The Applicant did not make any submissions under this Agenda item.

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Glossary

Term	Abbreviation	Explanation
A122		The new A122 trunk road to be constructed as part of the Lower Thames Crossing project, including links, as defined in Part 2, Schedule 5 (Classification of Roads) in the draft DCO (Application Document 3.1)
A122 Lower Thames Crossing	**Project**	A proposed new crossing of the Thames Estuary linking the county of Kent with the county of Essex, at or east of the existing Dartford Crossing.
A122 Lower Thames Crossing/M25 junction		New junction with north-facing slip roads on the M25 between M25 junctions 29 and 30, near North Ockendon.
A13/A1089/A122 Lower Thames Crossing junction		Alteration of the existing junction between the A13 and the A1089, and construction of a new junction between the A122 Lower Thames Crossing and the A13 and A1089, comprising the following link roads: • Improved A13 westbound to A122 Lower Thames Crossing southbound • Improved A13 westbound to A122 Lower Thames Crossing northbound • Improved A13 westbound to A1089 southbound • A122 Lower Thames Crossing southbound to improved A13 eastbound and Orsett Cock roundabout • A122 Lower Thames Crossing northbound to improved A13 eastbound and Orsett Cock roundabout • Orsett Cock roundabout to the improved A13 westbound • Improved A13 eastbound to Orsett Cock roundabout • Improved A1089 northbound to A122 Lower Thames Crossing northbound • Improved A1089 northbound to A122 Lower Thames Crossing southbound
A2		A major road in south-east England, connecting London with the English Channel port of Dover in Kent.
Application Document		In the context of the Project, a document submitted to the Planning Inspectorate as part of the application for development consent.
Construction		Activity on and/or offsite required to implement the Project. The construction phase is considered to commence with the first activity on site (e.g. creation of site access), and ends with demobilisation.
Design Manual for Roads and Bridges	**DMRB**	A comprehensive manual containing requirements, advice and other published documents relating to works on motorway and all-purpose trunk roads for which one of the Overseeing Organisations (National Highways, Transport Scotland, the Welsh Government or the Department for Regional Development (Northern Ireland)) is highway authority. For the A122 Lower Thames Crossing the Overseeing Organisation is National Highways.
Development Consent Order	**DCO**	Means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects (NSIP) under the Planning Act 2008.

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Term	Abbreviation	Explanation
Development Consent Order application	**DCO application**	The Project Application Documents, collectively known as the 'DCO application'.
Environmental Statement	**ES**	A document produced to support an application for development consent that is subject to Environmental Impact Assessment (EIA), which sets out the likely impacts on the environment arising from the proposed development.
Highways England		Former name of National Highways.
M2 junction 1		The M2 will be widened from three lanes to four in both directions through M2 junction 1.
M2/A2/Lower Thames Crossing junction		New junction proposed as part of the Project to the east of Gravesend between the A2 and the new A122 Lower Thames Crossing with connections to the M2.
M25 junction 29		Improvement works to M25 junction 29 and to the M25 north of junction 29. The M25 through junction 29 will be widened from three lanes to four in both directions with hard shoulders.
National Highways		A UK government-owned company with responsibility for managing the motorways and major roads in England. Formerly known as Highways England.
National Planning Policy Framework	**NPPF**	A framework published in March 2012 by the UK's Department of Communities and Local Government, consolidating previously issued documents called Planning Policy Statements (PPS) and Planning Practice Guidance Notes (PPG) for use in England. The NPPF was updated in February 2019 and again in July 2021 by the Ministry of Housing, Communities and Local Government.
National Policy Statement	**NPS**	Set out UK government policy on different types of national infrastructure development, including energy, transport, water and waste. There are 12 NPS, providing the framework within which Examining Authorities make their recommendations to the Secretary of State.
National Policy Statement for National Networks	**NPSNN**	Sets out the need for, and Government's policies to deliver, development of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks in England. It provides planning guidance for promoters of NSIPs on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.
Nationally Significant Infrastructure Project	**NSIP**	Major infrastructure developments in England and Wales, such as proposals for power plants, large renewable energy projects, new airports and airport extensions, major road projects etc that require a development consent under the Planning Act 2008.
North Portal		The North Portal (northern tunnel entrance) would be located to the west of East Tilbury. Emergency access and vehicle turn-around facilities would be provided at the tunnel portal. The tunnel portal structures would accommodate service buildings for control operations, mechanical and electrical equipment, drainage and maintenance operations.
Operation		Describes the operational phase of a completed development and is considered to commence at the end of the construction phase, after demobilisation.

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Term	Abbreviation	Explanation
Order Limits		The outermost extent of the Project, indicated on the Plans by a red line. This is the Limit of Land to be Acquired or Used (LLAU) by the Project. This is the area in which the DCO would apply.
Planning Act 2008		The primary legislation that establishes the legal framework for applying for, examining and determining Development Consent Order applications for Nationally Significant Infrastructure Projects.
Project road		The new A122 trunk road, the improved A2 trunk road, and the improved M25 and M2 special roads, as defined in Parts 1 and 2, Schedule 5 (Classification of Roads) in the draft DCO (Application Document 3.1).
Project route		The horizontal and vertical alignment taken by the Project road.
South Portal		The South Portal of the Project (southern tunnel entrance) would be located to the south-east of the village of Chalk. Emergency access and vehicle turn-around facilities would be provided at the tunnel portal. The tunnel portal structures would accommodate service buildings for control operations, mechanical and electrical equipment, drainage and maintenance operations.
The tunnel		Proposed 4.25km (2.5 miles) road tunnel beneath the River Thames, comprising two bores, one for northbound traffic and one for southbound traffic. Cross-passages connecting each bore would be provided for emergency incident response and tunnel user evacuation. Tunnel portal structures would accommodate service buildings for control operations, mechanical and electrical equipment, drainage and maintenance operations. Emergency access and vehicle turn-around facilities would also be provided at the tunnel portals.

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