



PORT OF  
**TILBURY**  
LONDON

**Section 56(2) Planning Act 2008**

**Application by National Highways Limited for an Order Granting Development  
Consent**

**for**

**Lower Thames Crossing**

**Planning Inspectorate Reference: TR010032**

**PORT OF TILBURY LONDON LIMITED – RESPONSE TO ExQ1 and ACTIONS FROM  
HEARINGS**

**Deadline 4: 19 September 2023**

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## RESPONSE TO EXQ1

ID	Addressed to	Question / Action	PoTLL Response
Q4.1.6	Applicant	<p>Modelled Traffic Effects: Accuracy of the Lower Thames Area Model</p> <p>It has been suggested that the accuracy of the LTAM could have been improved by validating the model against turning counts at key junctions. Was this approach considered by the Applicant and is there a requirement within TAG for such checks?</p>	<p>TAG unit M3.1, Table 2 sets out the validation criteria that are attributable to link flows and turning movements at junctions. Appropriate validation appears to have been undertaken for the base LTAM, however it is understood that certain key junctions were not included as validation count sites, including the Orsett Cock and ASDA junctions.</p> <p>The concern is that in the case of the LTC Scheme, localised modelling at these key junctions is showing substantially different and greater impacts than those identified by the LTAM model.</p> <p>This would suggest that the LTAM is not properly forecasting impacts.</p> <p>There is no satisfactory explanation of the difference and lack of regard to the localised modelling and disparities which cannot be considered minor, and therefore this all calls into question the accuracy, suitability and reliability of LTAM. The degree of disparity between the LTAM impacts and those identified through junction modelling shows that the LTAM model is not appropriately converged and is less reliable as a consequence.</p> <p>A greater degree of reliability for the LTAM could be achieved by undertaking an iterative process (inputting the VISSIM results into the LTAM), to ensure that the strategic model more accurately reflects important criteria, such as the delay expected at key junctions.</p>
Q4.1.7	Applicant	<p>Modelled Traffic Effects: Lower Thames Area Model and the Local Road Network</p> <p>It is noted that LTAM uses an AM peak of 0700-0800 whereas the AM peak on the local road network (LRN) is 0800-0900. What are the possible implications of this in</p>	<p>A key interface between the LTC and LRN (via the A1089) is the ASDA roundabout.</p> <p>Not including 08:00 to 09:00 as an assessment hour provides an incomplete assessment of the impacts where</p>

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		<p>terms of the traffic forecasts particularly at those locations where LTC interfaces with the LRN?</p>	<p>the LTC interfaces with the LRN, and in turn the subsequent effects this may have on the wider LTAM.</p> <p>At the ASDA roundabout and sections of the A1089, the AM peak hour has been identified as 08:00 to 09:00. As such, an assessment of the 08:00 to 09:00 peak hour is essential to understand fully the impacts of the LTC on the wider road network.</p> <p>At Deadline 3 the Applicant has provided a VISSIM model assessment of the ASDA roundabout. In this assessment the Applicant has assessed and identified 08:00 to 09:00 to be an AM peak hour.</p> <p>The VISSIM model showed that in the 08:00 to 09:00 AM peak hour the greatest impacts are predicted on the A126 Dock Road and the A1089 St Andrews Road arms.</p> <p>During construction the VISSIM assessment identified the greatest impacts on the A126 Dock Road, with increased delays.</p> <p>Similarly, the Applicant's VISSIM model during the operational phase identified increased delays and queues on the A126 Dock Road and A1089 St Andrews Road (South) Arms.</p> <p>The omission of an 08:00 to 09:00 LTAM assessment by the Applicant, leads to sensitive parts of the highway network which have the greatest impacts during this hour not being assessed. The worst-case impacts have not been considered and thus consistent consideration and assessment has not been achieved.</p>
Q4.1.8	Applicant	<p>Modelled Traffic Effects: Thames Freeport</p> <p>Can the Applicant explain how it has modelled the impact of the Thames Freeport, the implications for the LTC and</p>	<p>In early September 2023, the Applicant shared the modelling it had undertaken in respect of the Freeport with PoTLL.</p>

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		<p>also why the results of the work have not been shared with Port of Tilbury London Limited (PoTLL)?</p>	<p>TAG Guidance for the Technical Project Manager sets out the importance of sensitivity testing. This states, at paragraph 3.3.5, that “sensitivity testing is key to good practice” and enables “a transparent story to be told regarding the sensitivity to assumptions and to the potential risks that scheme benefits may be prone to”. Without proper sensitivity testing the scheme benefits should be viewed cautiously.</p> <p>TAG Unit M4 provides the detail of how that sensitivity testing is to be carried out, including how future inputs are to be classified.</p> <p>In PoTLL’s view, the Freeport is ‘reasonably foreseeable’ – being a committed policy goal for Government, but where there is significant uncertainty. As such, the Freeport should not be included within the core scenario but may and should form part of the alternative scenarios.</p> <p>The Applicant has not assessed alternative scenarios, instead using a Low and High use model. The Freeport does not form part of the High growth scenario and has therefore not been assessed as part of the Environmental Statement.</p> <p>The modelling that has been shared with PoTLL is not sensitivity testing of the LTC Scheme in accordance with TAG Unit M4. Under TAG, the Applicant must update the core scenario to include the reasonably foreseeable projects (i.e. the Freeport) into the baseline in order to construct the alternative scenario, and then assess the operation of LTC against that alternative scenario.</p> <p>The Applicant has not done this, instead assuming that the Freeport will be brought forward after the LTC Scheme is open and operational. It has therefore assessed the impact of the Freeport in an alternative scenario where LTC forms part of the baseline. Not only is this based on incorrect assumptions as to the timing of the Freeport, it</p>

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			<p>does not meet the requirements for the forecasting of alternative scenarios as set out in TAG Unit M4.</p> <p>PoTLL is mindful that paragraphs 7.3.18 and .19 of Unit M4 refer to a reference forecast for freight traffic growth, indicating that a single growth factor for freight growth will usually suffice. It continues to state that there may be circumstances where simple factoring methods may not be appropriate “because a major development, such as a distribution centre or retail park, will affect freight demand”. TAG does not provide guidance for these circumstances, instead advising early engagement with the Department for Transport.</p> <p>It would therefore be helpful to understand if the Applicant has had any discussions with the DfT as to how it should be assessing Freeport traffic as part of an alternative scenario, to understand if the Applicant’s broader refusal to assess the Freeport in the absence of a proposed scheme of local road network intervention and/or approach of assessing the Freeport against a baseline that includes LTC is a direction from Government.</p> <p>PoTLL maintains its view that the Applicant has not had regard to the Freeport in its modelling and that it has not complied with the requirements under TAG Unit M4 as a result. It is important to understand how the LTC will operate in all reasonably foreseeable circumstances and, as such, proper sensitivity testing that includes the Freeport in an alternative scenario must be undertaken.</p>
Q4.1.9	Applicant	<p>Modelled Traffic Effects: Traffic Flow Simulation: Orsett Cock</p> <p>Given the use of ‘actual’ rather than ‘demand’ flows and also the omission of Freeport traffic from the Vissim modelling, is it fair to say that the Applicant’s microsimulation modelling of the Orsett Cock roundabout</p>	<p>As noted in PoTLL’s response to Q4.1.8, the absence of an alternative scenario including the Freeport results in an underestimation of traffic on the network including at the Orsett Cock junction. Consequently, the LTC scheme benefits may have been overestimated and there is a lack of understanding of the risks associated with the predicted scheme benefits.</p>

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		submitted at Deadline 1 could represent an underestimation of flows through the roundabout?	
Q4.1.10	Applicant, Thurrock Council, PoTLL, DPWLG, LRN stakeholders	<p>Modelled Traffic Effects: Traffic Flow Simulation: Orsett Cock</p> <p>If the traffic impacts at Orsett Cock roundabout have not been fully understood and/or modelled, what are the wider implications for the Applicant's Transport Assessment?</p>	<p>The Applicant's position in respect of access to the Port of Tilbury is that, due to relieved congestion at the Dartford Crossing, journey times are reduced and access is therefore improved.</p> <p>In order to understand the full implications for access to the Port of Tilbury from greater-than-assessed impacts at the Orsett Cock roundabout, it is first necessary to scrutinise the accuracy of the Applicant's assumptions and position.</p> <p>Appendices B and C to Applicant's Transport Assessment (TA) [APP-531; APP-532] show the journey time changes predicted for 2030 and 2045 respectively. In respect of the Port of Tilbury, this shows journey time comparisons to and from locations south of the river, i.e. using the tunnel. No information is provided as to journey time differences from locations north of the river.</p> <p>As set out in PoTLL's Written Representation [REP1-274], the largest journey time improvements are experienced for movements between Tilbury and locations south-east of Tilbury, in both directions. These journey time improvements are tied to journey distance reductions – i.e. use of the operational LTC.</p> <p>Whilst there are journey time reductions to locations south-west of Tilbury, these are, collectively, less than half the time savings achieved for locations to the south-east of Tilbury. Journeys to the south-west do not benefit from journey distance improvements, and therefore continue to utilise the Dartford Crossing.</p> <p>We have provided at Appendix 1 to this document the relevant extracts of assessed journeys to and from Tilbury</p>

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			<p>for the 2030 and 2045 periods, enabling these benefits to be clearly reviewed.</p> <p>The primary benefit to Tilbury, and therefore the Port of Tilbury, is not reduced journey times on the Dartford Crossing. Whilst this is a factor, the primary benefit is reduced journey times to and from locations in the south-east, associated with the reduced journey distance obtained by using LTC. For journeys to Tilbury that use LTC, the Orsett Cock junction is a key factor in the reliability of the journey time estimates provided by the Applicant, and congestion at the Orsett Cock roundabout will reduce the benefits of the Scheme to the Port.</p> <p>As above, without journey time changes to and from locations north of the river Thames being provided, it is not possible to comment on whether there are any journey time savings associated with reduced congestion on the M25 or if traffic would seek to use the LTC, leaving at the A13/A1089/LTC junction. This information is key to understanding the full wider impacts of additional congestion at the Orsett Cock roundabout – if southbound traffic is seeking to use LTC to access the A1089 in preference to the M25 and A13, despite this being marginally longer due to the convoluted connection at the Orsett Cock roundabout, this will be additional traffic on the roundabout that has not been adequately assessed.</p> <p>In the event impacts on the Orsett Cock junction are severe, resulting in significant congestion at the roundabout, the impacts for journeys to Tilbury would be as follows:</p> <ul style="list-style-type: none"> <li>• Reduced journey time savings for all journeys from the south-east due to the direct impact of being caught in congestion and delays at Orsett Cock;</li> </ul>



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			<ul style="list-style-type: none"> <li>• Decreased journey time reliability to that assessed for all journeys from the south-east, flowing from congestion and traffic diverting;</li> <li>• Increased congestion on local roads as drivers seek to avoid the Orsett Cock roundabout;</li> <li>• Increased need for immediate and substantial mitigation at the Orsett Cock roundabout and surrounding road network, to reduce throughput, with associated cost to the local highway authority; and</li> <li>• Reduced journey time benefits, and increased impacts from journey time unreliability, flowing into the economic assessment.</li> </ul> <p>It is important to caveat the above impacts with the disclaimer that there is an element of informed speculation inherent in this. Without the VISSIM estimated delays expected at the Orsett Cock roundabout being fed back into the LTAM model, it is difficult to predict exactly how traffic patterns will change. However, on the central premise (inherent in the LTAM) that traffic reaches an equilibrium based on cost of travel (of which delay is a key component) it is reasonable to expect that traffic will reassign to avoid congestion. Accordingly, PoTLL considers the above impacts are most likely, given the extent of the impacts to the junction being identified.</p>
Q4.1.14	All	<p>Modelled Traffic Effects: Lower Thames Area Model: TAG Compliance</p> <p>Does any party disagree with the Applicant's conclusion that the LTAM is TAG compliant? If so, please explain why.</p>	<p>As noted in PoTLL's response to Q4.1.8, the absence of an alternative scenario including the Freeport as a sensitivity test does not comply with the requirements for the forecasting of alternative scenarios as set out in TAG Unit M4.</p>
Q4.2.6	DPLGW/PoTLL	Mitigation Design: Orsett Cock and Manorway	PoTLL understands that the potential for impacts to the Manorway junction arises directly from the levels of

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		<p>Is it accepted that adequate mitigation at Orsett Cock would obviate the need for the same at the Manorway junction?</p>	<p>congestion to the Orsett Cock junction. As such, PoTLL understands that adequate mitigation for Orsett Cock (located at that junction, or by way of a broader holistic scheme to mitigate the impacts) would have the effect of additionally resolving the impacts at Manorway.</p> <p>However, PoTLL would defer to the view of DPWLG as the party best placed to understand the impacts on the Manorway junction.</p>
Q4.2.8	DPWLG	<p>Policy Approach to Maintaining Existing Network ‘Status Quo’</p> <p>Can DPWLG explain what sections of the NPSNN support its view that the ‘status quo must be maintained’?</p>	<p>PoTLL recognises that the statement quoted referred to DPWLG’s submission that access to that port would be maintained and, if necessary, mitigation for adverse impacts provided. Whilst the comment related specifically to the Manorway junction and impacts on London Gateway, the response to this question has implications for other aspects of the LTC Scheme design, including the altered accesses to the Port of Tilbury.</p> <p>NNNPS paragraph 4.31 sets out how ‘good design’, an integral consideration from the outset of a proposal, should meet the principal objectives of the scheme. This is done by “eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts”. The scheme “should also mitigate any existing adverse impacts wherever possible”. These improvements should then be sustained “for as many years as practicable”.</p> <p>Paragraph 4.32 continues to make clear that “Scheme design will be a material consideration in decision making” and, whilst design also relates in large part to the appearance of the scheme, it is clear from paragraph 4.31 that the functional operation of the scheme is a key and relevant factor in design.</p> <p>It is also important to consider that the LTC Scheme is altering the road network used by two strategic ports. In this regard, the support for the statement that the ‘status</p>

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			<p>quo' must be maintained is found more broadly, by considering the harm that may be caused where the status quo is not maintained or improved.</p> <p>Paragraph 2.13 clearly sets out the importance of the Strategic Road Network (SRN) in connecting major ports and driving prosperity. The SRN also carries two thirds of freight traffic. In considering the broader drivers of the need for development of the national road network, paragraph 2.16 sets out the impact of traffic congestion in constraining the economy and negatively impacting on quality of life, including by 'constraining existing economic activity as well as economic growth'.</p> <p>In PoTLL's view, the NNNPS sets out clearly the importance of the national road network to the economy, with connectivity to the ports forming a key part of that. As such, whilst there may not be a general duty to maintain the 'status quo' of functionality across the network (albeit paragraph 4.31 would appear to require best efforts to do so), there must be such a duty in respect of port accesses. Simply, development of the national road network that negatively impacts access to ports, airports and rail terminals must be seen to be contrary to the NNNPS as it runs contrary to the need for development of the road network.</p>
Q4.3.1	Applicant	<p>Missing Journey Times</p> <p>In terms of journey time reliability can the applicant explain why in Transport Assessment Appendices B &amp; C important routes have been omitted from the comparison tables, for example for Tilbury Port only movements 7-12 have been presented? Where are the comparisons for movements 1-4?</p>	<p>As set out in PoTLL's response to Q4.1.10, the absence of these journey times makes it more challenging to obtain a full understanding of how use of the LTC will change journeys that do not cross the river.</p> <p>However, the LTC Scheme is not simply a river crossing, but includes a section entirely north of the river, connecting the M25 to the A13. This section is also likely to impact journey times and this data should be provided.</p> <p>PoTLL would also request that journey times for the movements 6 to 5 (DP World to Tilbury Port) and 5 to 6</p>

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			(Tilbury Port to DP World) are provided, both for completeness, and in order to understand the impact to westbound journeys on the A13 of the connection to the A1089 being made via the Orsett Cock roundabout.
Q4.3.9	DPWLG/PoTLL	<p>Overall Comparison of journey times to/from Ports</p> <p>Has DPWLG carried out an overall assessment of journey times to/from the port with/ without the scheme? If so, does DPLGW agree with the Applicant's view that despite increased delays at Orsett Cock the overall effect on the port would be beneficial? (See Transport Assessment Appendices B and C)</p>	<p>PoTLL recognise the difficulties in accurately assessing impacts, especially where there are missing journey times from the Applicant's evidence, as noted in response to Q4.1.10. Notwithstanding this, the Applicant's Transport Assessment appendices demonstrate that, for cross-river journeys, the journey time improvements to the ports are greatest where drivers use LTC. This is true for journeys to the Port of Tilbury despite the lack of a direct connection and the additional distance of travelling via Orsett Cock. As such, a lot of the benefits that the Applicant relies upon in respect of journey times to the ports are intrinsically tied to the free-flowing operation of the Orsett Cock roundabout.</p> <p>As noted in response to Q4.1.10, it cannot be confidently stated that the LTC Scheme does provide an overall benefit to the Port until the Orsett Cock VISSIM is fed back into the LTAM to adequately assess delay.</p>
Q4.6.5	PoTLL	<p>ASDA Roundabout Concerns</p> <p>Notwithstanding the Applicant's commitment to provide a microsimulation model of the A1089 ASDA roundabout at Deadline 3, concerns are raised regarding the operation of the ASDA roundabout during the construction period. However, PoTLL is specifically listed as a TMP consultee. Moreover, the requirements of the ports are clearly set out in Table 2.3 of the oTMPfC [REP1-174] under 'Logistics Centres'. Accordingly, it appears that the Applicant is alive to the concerns of the ports in terms of access and that the TMP would provide for modelling on sensitive parts of the network before commencement of the relevant construction phase. Can PoTLL therefore explain why its</p>	<p>PoTLL is grateful to the Applicant for providing microsimulation of the ASDA roundabout to include construction Phases 1 and 6. The underlying VISSIM model and data was also shared with PoTLL following ISH7.</p> <p>Whilst PoTLL has concerns around the methodology underpinning the construction traffic assessment, that may result in the impacts being under-estimated, the report nevertheless highlights the extensive impacts of the Applicant's proposals to the junction and surrounding road network. Most notably, construction phase 1 results in a mean maximum queue length of over 1km in length on Dock Road. This road connects into Tilbury and a queue</p>

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		<p>concerns are not capable of being addressed by Requirement 10 of the draft DCO?</p>	<p>of the length stated would extend beyond Tilbury Town station.</p> <p>It is therefore apparent that the impacts of the additional construction traffic proposed by the Scheme will include those that have not yet been assessed by the Applicant – to air quality, noise and vibration, safety, and issues of severance. The only mitigation for these (unassessed) impacts is the oTMPfC.</p> <p>The Applicant's report has also not considered the wider impacts on traffic of congestion of the scale identified. In PoTLL's view, traffic from Tilbury will reassign onto Fort Road, combining with Port traffic on the A1089 northwards. This additional traffic on the A1089, in turn, will cause queueing, which could extend as far as the main entrance to the Port of Tilbury located only 500m away from the roundabout.</p> <p>This would impact on the ability of traffic to exit the Port of Tilbury – something that, if it occurs, must be resolved immediately to ensure that PoTLL can continue to comply with its Open Port Duty (see section 3 of PoTLL's written representation [REP1-274]).</p> <p>PoTLL recognises that it is included as a consultee for the TMP and welcome its inclusion in this. However, the oTMPfC is a generic document, primarily designed to facilitate communication, discussion and engagement. It has not been designed to accommodate the bespoke needs of the Port, and does not provide the real-time monitoring, escalation and responsiveness that is required to ensure that performance at the ASDA roundabout remains at a level that enables the continued operation of the Port.</p> <p>The provisions that PoTLL considers are missing from the oTMPfC are those that PoTLL has sought to include in the bespoke traffic management protocol (Appendix 8 of</p>

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			<p>PoTLL's written representation). This seeks to provide clarity for when congestion on this roundabout is so severe that it will impact the Port, as well as providing a mechanism for the resolution of such issues, including where resolution must be implemented immediately due to the severity of the impacts. In this regard, the Protocol seeks to provide a framework to address issues proactively before they cause severe impacts, based on agreed criteria. The Protocol also considers in detail what traffic management measures will enable continued functionality of the A1089, so that when detailed design takes place, it will accommodate these practical and functional limitations of the road.</p> <p>Whilst PoTLL has not yet agreed the Protocol and entered into an agreement with the Applicant that includes this protocol, PoTLL remains of the view that the oTMPfC is not sufficiently reactive, nor does it contain the 'teeth' needed to require the Applicant to mitigate impacts, despite the potential for economic harm to be caused.</p> <p>PoTLL also maintains its position that, in order to ensure impacts on the ASDA roundabout are properly mitigated, it must be included within the Order limits. This would require additional compulsory acquisition, however the extent of the impacts the Applicant has now identified does, in PoTLL's view, justify this work being undertaken.</p>
Q5.1.7	Applicant	<p>Construction Phase Traffic Impacts</p> <p>The methodology for assessing construction traffic air quality impacts is explained in Paragraphs 5.3.22 to 5.3.35 of ES Chapter 5 – Air Quality [APP-143]. Whilst it is recognised that the assessment has followed DMRB LA 105 guidance, can the Applicant clarify that there would be no exceedances of AQS limit values during the construction phase?</p>	<p>PoTLL refers to its response to Q4.6.5, above, in respect of the mean maximum queue on Dock Road identified for Construction Phase 1.</p> <p>PoTLL is hopeful that the air quality impacts of this queue will have been considered by the Applicant in its response to this question.</p>

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Q10.4.6	Applicant	<p>Construction phase drainage plan</p> <p>It is noted that the Contractor is expected to develop a construction phase drainage plan to demonstrate how surface water runoff is to be managed both across the worksite and offsite. Given the programmed construction phase and the delays in commencing on site, should the temporary works design be undertaken to include climate change allowances up to 2030 or should they use the 'up to date' allowances over the construction period?</p>	<p>PoTLL supports the principle that the design of construction-phase surface water management features should factor in an appropriately conservative allowance for climate change. Given the delays to commencement, both known and potential, and the changing picture as regards the influence of climate change, PoTLL advocates that a 'future proofing' allowance or buffer should be included by, for example, modelling designs on a date beyond the currently anticipated conclusion of the construction phase (e.g. 2035 or 2040).</p>
Q11.7.1	Natural England	<p>SSSI Designation</p> <p>Can Natural England continue to provide an update on the progress with the notification of land at Tilbury as a possible Site of Special Scientific Interest and confirm when a decision is likely to be made? The ExA would welcome notification at times when the situation changes.</p>	<p>PoTLL supports the ExA's request. PoTLL has engaged extensively with Natural England and continues to have open and constructive dialogue with them insofar as any SSSI notification could involve land under Port ownership or control. Additional certainty on these matters is desirable. PoTLL is aware that Natural England's considerations around SSSI notification encompass significant areas of adjoining land or sites, much of which might meet the statutory purpose of notification, and is working constructively with Natural England to achieve best outcomes.</p>

## RESPONSE TO ACTION POINTS FROM ISH3 TO 7 AND CAH1

The following table includes PoTLL’s responses to actions allocated to it from Issue Specific Hearings 3 to 7, and Compulsory Acquisition Hearing 1.

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ISH3-1	All LPAs, All local highway authorities and TfL, Port of Tilbury London Ltd., DP World London Gateway, Port of London Authority	Reflections on the Applicant’s Additional Submissions – Visual Representations of Intersections for ISH3 Pursuant to Procedural Decision 37 by the ExA of 1 September 2023 [PD-033], on 5 September 2023 the Applicant introduced visual representations of the function of the three main proposed intersections A2/ M2/ LTC [AS-145], A13/ A1089/ LTC [AS-146] and M25/ LTC [AS-147]. Detailed written observations on that material is sought by Deadline 4.	<p>PoTLL’s responses are made in respect of the A13/A1089/LTC junction [AS-146] only, and any references to slide numbers should be taken to refer to slides in that document.</p> <p>The Applicant has provided a key showing Strategic, Major and Local routes. However, no explanation has been provided for the criteria by which a route may be labelled as Strategic, Major or Local. We nevertheless understand that this must constitute a hierarchy, with strategic connections seeing more traffic and use than major connections which, themselves, would see more traffic and use than local connections. We are also mindful that the nature of the connections, the roads they connect, and the kind of traffic (e.g. HGVs) using the connection may be a factor in upgrading a ‘major’ connection to a ‘strategic’ one.</p> <p>Slide 5 demonstrates that the Applicant considers the connection from the A1089 to the LTC in each direction to be a strategic connection – one that takes a large volume of traffic, connects key highways, and a large proportion of HGVs.</p> <p>Slide 10 shows the connection from the A1089 to the LTC to also be locally important. Our understanding is that the Applicant recognises the importance of the A1089 as the route by which local traffic in and around Tilbury may connect with the Strategic Road Network, and that this slide also reflects the proposed benefit of enabling cross-river commuting.</p>



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			<p>Slide 30 also shows the connection from the A1089 to the LTC, this time in the context of access specifically from the Port of Tilbury.</p> <p>However, despite the connection <i>from</i> the A1089 to LTC being recognised as strategically important, locally important, and providing access from the Port of Tilbury, only Slide 32 shows the route that must be taken to connect from LTC to the A1089. The additional distance that must be travelled as no direct connection is provided is plain to see.</p> <p>Comparing slide 5 and slide 32, it is difficult to reconcile why traffic flows in one direction are seemed strategic, where the connection in the opposite direction is not relevant even to local traffic. PoTLL is disappointed that connectivity has not been approached more even handedly, seeking to ensure equal provision both from and to the A1089.</p> <p>When considering the other connections and how these are classified, it becomes less clear why connectivity onto the A1089 has not been prioritised.</p> <p>It therefore appears from the slides that, in designing the A13/A1089/LTC junction, the Applicant has placed a higher value on the major road connection to the A13 to the east of the junction, than to the strategic connection with the A1089. Whilst PoTLL does not wish to suggest that connectivity to the A13 should have been reduced instead, it serves to highlight the design failings of the A13/A1089/LTC junction.</p> <p>PoTLL is, therefore, grateful for the Applicant's unequivocal statements that the Tilbury Link Road is being invested in by National Highways as part of RIS3, as the provision of a direct connection to the Port of Tilbury will help offset and mitigate the poor connectivity demonstrated by Slide 32, as well as help to remedy the</p>

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			<p>oversights in design that have seen the strategic connections to the A1089 so severely downgraded.</p> <p>Finally, in respect of Slide 26, showing the updated traffic movements from the A13 to the A1089, PoTLL wishes to note that the red line, denoting the proposed change, does not include the Orsett Cock junction and the slip onto it. As such, it does not represent the full extent of the proposed change to this traffic movement.</p>
ISH3-8	Applicant	<p>A13/ A1089/ LTC</p> <p>Arising from questions raised by Port of Tilbury London Ltd (PoTLL), the Applicant is asked to provide a breakdown of new movement numbers at the Orsett Cock Roundabout necessitated by traffic movements between the LTC and the Port of Tilbury.</p>	<p>PoTLL has received the data showing the additional movement numbers at the Orsett Cock junction. This was sent, as advised by the Applicant, during ISH-4.</p> <p>An initial review of the data and comparison with the Applicant's submitted documents has led to a number of comments, set out below. However, further review is ongoing and further comment is anticipated to be provided at Deadline 5.</p> <p>Having reviewed this data, it demonstrates that approximately 1/5 of all additional traffic on the Orsett Cock junction is connecting with the A1089. This is a significant proportion of the additional traffic on the Orsett Cock, causing impacts identified in VISSIM junction modelling, that flow from the decision not to provide any direct connection with the A1089.</p> <p>The Applicant has provided the AM and PM peak hour LTC derived flows for the exits from the Orsett Cock roundabout and the A1089 southbound on-slip, for both the DM and DS scenarios in 2030 and 2045.</p> <p>Upon initial review this details that, with the introduction of the LTC, traffic flows on the A1089 Southbound on-slip link increase in all assessed periods.</p>

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			<p>Notably in the AM peak the increase in traffic through the Orsett Cock junction which then routes onto the A1089 South exceeds the total increase in traffic through the junction originating on the LTC. In other words, were traffic headed to the A1089 South from Orsett Cock be removed (e.g. by provision of direct connectivity), the reduction would be sufficient to reduce total traffic to a level consistent with the Do Minimum scenario. This would result in the junction operating no worse in the Do Something scenario.</p> <p>In the PM peak the increase in traffic through the junction heading to the A1089 South is broadly half of the total increase in traffic through the junction. Removal of traffic headed to the A1089 South from the Orsett Cock junction would noticeably improve its performance.</p> <p>PoTLL would therefore encourage the Applicant to have regard to its statutory duty to act in a manner best calculated to achieve efficiency and value for money and take a holistic approach to resolving the issues at the Orsett Cock junction, including prioritising future strategic roads scheme to offset impacts.</p>
ISH4-1	Applicant	<p>Orsett Cock LTC Peak-hour Traffic Flows</p> <p>Please share AM &amp; PM peak-hour LTC derived flows using the A128 approach to the Orsett Cock roundabout.</p>	Please refer to PoTLL's response to ISH3-8.
ISH4-3	Thurrock Council / DP World / PoTLL / Applicant	<p>Local Road Network Impact Mitigation: Security</p> <p>Consider how the DCO/Wider Network Impacts Management and Monitoring Plan [APP-545] could be amended to secure mitigation at locations where monitoring shows that LTC traffic has caused unacceptable impacts on the local road network that were</p>	<p>As advised in ISH7, PoTLL considers that appropriate mitigation can be secured through the provision of three new DCO Requirements.</p> <p>First, a Requirement to assess construction impacts on key junctions (e.g. the ASDA roundabout) and present a mitigation and monitoring plan to the Secretary of State,</p>

ID	Addressed to	Question / Action	PoTLL Response
		not predicted in the Transport Assessment i.e., the Orsett Cock roundabout.	<p>ensuring that mitigation is in place before the construction impacts arise.</p> <p>Secondly, a Requirement to assess the detailed design of the Orsett Cock junction and present a mitigation and monitoring plan to the Secretary of State, ensuring that mitigation is in place prior to the opening of LTC.</p> <p>Thirdly, a Requirement in the form preceded by requirement 7 of The Silvertown Tunnel Order 2018, to ensure that the impacts of the operational LTC are identified and mitigated for.</p> <p>Proposed drafting of these Requirements has been provided separately in PoTLL's DCO Drafting Proposals, submitted at Deadline 4.</p>
ISH7-5	PoTLL / DP World / Thurrock Council / Applicant	<p>Orsett Cock Roundabout</p> <p>Without prejudice, Provision of draft wording for an additional DCO requirement relating specifically to the modelling, monitoring and if necessary, mitigation of the Orsett Cock roundabout.</p>	PoTLL has provided its proposed drafting in respect of the Orsett Cock roundabout in PoTLL's DCO Drafting Proposals, submitted at Deadline 4.
ISH7-6	Applicant and relevant local authorities	<p>Workshop (Orsett Cock)</p> <p>Undertake a workshop and then present a joint paper in respect of the traffic modelling for this junction. The focus should be on narrowing areas of disagreement specifically to reconcile identified differences between the LTAM and VISSIM modelling while recognising that there will always be a degree divergence between different models. Local Highway Authorities should not insist on an unreasonable degree of convergence which goes beyond that normally achieved in respect of other large road schemes.</p>	<p>This action is to be completed for Deadline 5. However, PoTLL notes that DPWLG and PoTLL have been omitted from the parties this action is aimed at.</p> <p>PoTLL confirms, nevertheless, that it is in communication with Thurrock Council, DPWLG and the Applicant in respect of taking part in this workshop.</p>
ISH7-8	Applicant and PoTLL	Compulsory Acquisition (ASDA Roundabout)	PoTLL has provided a plan identifying the land that it considers is required to be included within the Order Limits

ID	Addressed to	Question / Action	PoTLL Response
		<p>The Port of Tilbury proposed mitigation works at the ASDA Roundabout on the A1089. It was suggested in the hearing that these may necessitate the acquisition of land / rights beyond the extent of the current highway. If that is the case, please identify the land required and the procedural implications of drawing it into the proposed development.</p> <p>(Deadline 5) Please discuss the proposed mitigations and form a statement identifying what if any measures are agreed, whether any are agreed to require additional land or rights and if so, the steps to be taken to acquire them.</p>	<p>as Appendix 1 to its Response to Deadline 3 Submissions - ASDA Roundabout Modelling, submitted at Deadline 4.</p>

**APPENDIX 1**

**JOURNEY TIME SAVINGS TO AND FROM THE PORT OF TILBURY**

**EXTRACTS FROM [APP-531] AND [APP-532]**

**2030**

Movement	2030 AM Peak		DM			DS			Difference			Difference %		
	From	To	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance	Time	Speed
5 to 7	Tilbury	Bexley	28.3	38.0	44.8	28.3	33.6	50.6	0.0	-4.4	5.8	0.0%	-11.6%	12.9%
5 to 8	Tilbury	Godstone	58.0	56.7	61.3	58.0	52.0	66.9	0.0	-4.7	5.6	0.0%	-8.3%	9.1%
5 to 9	Tilbury	Southfleet	28.6	33.7	51.0	27.7	22.3	74.5	-0.9	-11.4	23.5	-3.1%	-33.8%	46.1%
5 to 10	Tilbury	Maidstone	54.6	51.3	64.0	41.9	38.7	65.0	-12.7	-12.6	1.0	-23.3%	-24.6%	1.6%
5 to 11	Tilbury	Rochester	40.9	49.9	49.2	29.3	31.5	55.7	-11.6	-18.4	6.5	-28.4%	-36.9%	13.2%
5 to 12	Tilbury	Rainham	57.9	55.4	62.8	46.4	37.0	75.3	-11.5	-18.4	12.5	-19.9%	-33.2%	19.9%
7 to 5	Bexley	Tilbury	28.6	37.4	45.8	28.6	31.3	54.8	0.0	-6.1	9.0	0.0%	-16.3%	19.7%
8 to 5	Godstone	Tilbury	58.7	57.7	61.1	58.7	51.3	68.6	0.0	-6.4	7.5	0.0%	-11.1%	12.3%
9 to 5	Southfleet	Tilbury	27.7	37.2	44.7	31.4	27.9	67.5	3.7	-9.3	22.8	13.4%	-25.0%	51.0%
10 to 5	Maidstone	Tilbury	55.2	57.5	57.6	45.9	40.3	68.3	-9.3	-17.2	10.7	-16.8%	-29.9%	18.6%
11 to 5	Rochester	Tilbury	42.7	61.0	41.9	32.9	37.3	52.9	-9.8	-23.7	11.0	-23.0%	-38.9%	26.3%
12 to 5	Rainham	Tilbury	58.7	73.9	47.7	50.2	50.1	60.1	-8.5	-23.8	12.4	-14.5%	-32.2%	26.0%

Movement	2030 Inter Peak		DM			DS			Difference			Difference %		
	From	To	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance	Time	Speed
5 to 7	Tilbury	Bexley	28.3	28.8	58.9	28.3	27.0	62.9	0.0	-1.8	4.0	0.0%	-6.3%	6.8%
5 to 8	Tilbury	Godstone	58.0	44.7	77.8	58.0	42.8	81.4	0.0	-1.9	3.6	0.0%	-4.3%	4.6%
5 to 9	Tilbury	Southfleet	28.6	26.2	65.6	27.7	19.2	86.7	-0.9	-7.0	21.1	-3.1%	-26.7%	32.2%
5 to 10	Tilbury	Maidstone	54.6	42.2	77.6	41.9	31.4	80.0	-12.7	-10.8	2.4	-23.3%	-25.6%	3.1%
5 to 11	Tilbury	Rochester	40.9	39.5	62.2	29.3	27.1	64.7	-11.6	-12.4	2.5	-28.4%	-31.4%	4.0%

	2030 Inter Peak		DM			DS			Difference			Difference %		
Movement	From	To	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance	Time	Speed
5 to 12	Tilbury	Rainham	57.9	46.9	74.1	46.4	34.4	80.8	-11.5	-12.5	6.7	-19.9%	-26.7%	9.0%
7 to 5	Bexley	Tilbury	31.9	35.6	53.8	31.9	30.3	63.3	0.0	-5.3	9.5	0.0%	-14.9%	17.7%
8 to 5	Godstone	Tilbury	62.1	55.4	67.3	62.1	50.1	74.3	0.0	-5.3	7.0	0.0%	-9.6%	10.4%
9 to 5	Southfleet	Tilbury	30.6	36.4	50.3	34.8	27.5	75.9	4.2	-8.9	25.6	13.7%	-24.5%	50.9%
10 to 5	Maidstone	Tilbury	58.6	51.5	68.2	49.2	38.4	77.0	-9.4	-13.1	8.8	-16.0%	-25.4%	12.9%
11 to 5	Rochester	Tilbury	44.8	52.4	51.2	36.2	34.6	62.8	-8.6	-17.8	11.6	-19.2%	-34.0%	22.7%
12 to 5	Rainham	Tilbury	62.0	59.6	62.5	53.6	41.6	77.2	-8.4	-18.0	14.7	-13.5%	-30.2%	23.5%

	2030 PM Peak		DM			DS			Difference			Difference %		
Movement	From	To	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance	Time	Speed
5 to 7	Tilbury	Bexley	28.3	34.3	49.6	28.3	30.0	56.6	0.0	-4.3	7.0	0.0%	-12.5%	14.1%
5 to 8	Tilbury	Godstone	58.0	48.6	71.6	58.0	44.1	79.0	0.0	-4.5	7.4	0.0%	-9.3%	10.3%
5 to 9	Tilbury	Southfleet	27.2	31.3	52.1	27.7	20.2	82.4	0.5	-11.1	30.3	1.8%	-35.5%	58.2%
5 to 10	Tilbury	Maidstone	54.6	50.3	65.2	41.9	36.5	69.0	-12.7	-13.8	3.8	-23.3%	-27.4%	5.8%
5 to 11	Tilbury	Rochester	41.3	50.5	49.1	29.8	32.4	55.3	-11.5	-18.1	6.2	-27.8%	-35.8%	12.6%
5 to 12	Tilbury	Rainham	57.9	64.0	54.3	46.4	45.6	61.1	-11.5	-18.4	6.8	-19.9%	-28.8%	12.5%
7 to 5	Bexley	Tilbury	28.6	36.0	47.6	28.6	29.6	57.9	0.0	-6.4	10.3	0.0%	-17.8%	21.6%
8 to 5	Godstone	Tilbury	58.2	57.5	60.7	58.2	51.4	67.9	0.0	-6.1	7.2	0.0%	-10.6%	11.9%
9 to 5	Southfleet	Tilbury	27.7	34.2	48.6	31.5	25.1	75.4	3.8	-9.1	26.8	13.7%	-26.6%	55.1%
10 to 5	Maidstone	Tilbury	59.1	56.0	63.3	45.9	39.3	70.0	-13.2	-16.7	6.7	-22.3%	-29.8%	10.6%
11 to 5	Rochester	Tilbury	41.5	56.8	43.8	32.9	36.1	54.7	-8.6	-20.7	10.9	-20.7%	-36.4%	24.9%
12 to 5	Rainham	Tilbury	58.7	63.1	55.8	50.2	41.6	72.5	-8.5	-21.5	16.7	-14.5%	-34.1%	29.9%

2045

Movement	2045 AM Peak		DM			DS			Difference			Difference %		
	From	To	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance	Time	Speed
5 to 7	Tilbury	Bexley	28.3	45.5	37.3	28.3	40.9	41.6	0.0	-4.6	4.3	0.0%	-10.1%	11.5%
5 to 8	Tilbury	Godstone	58.0	66.2	52.5	58.0	61.4	56.7	0.0	-4.8	4.2	0.0%	-7.3%	8.0%
5 to 9	Tilbury	Southfleet	28.6	40.5	52.3	27.7	27.2	61.2	-0.9	-13.3	8.9	-3.1%	-32.8%	17.0%
5 to 10	Tilbury	Maidstone	54.6	58.4	56.1	42.0	45.5	55.3	-12.6	-12.9	-0.8	-23.1%	-22.1%	-1.4%
5 to 11	Tilbury	Rochester	40.9	57.9	42.4	29.4	36.9	47.7	-11.5	-21.0	5.3	-28.1%	-36.3%	12.5%
5 to 12	Tilbury	Rainham	57.9	63.6	54.6	46.4	43.1	64.6	-11.5	-20.5	10.0	-19.9%	-32.2%	18.3%
7 to 5	Bexley	Tilbury	28.6	39.4	43.5	28.6	30.2	56.7	0.0	-9.2	13.2	0.0%	-23.4%	30.3%
8 to 5	Godstone	Tilbury	58.7	61.7	57.2	58.7	52.8	66.7	0.0	-8.9	9.5	0.0%	-14.4%	16.6%
9 to 5	Southfleet	Tilbury	27.7	39.3	42.3	31.4	26.8	70.4	3.7	-12.5	28.1	13.4%	-31.8%	66.4%
10 to 5	Maidstone	Tilbury	55.2	62.7	52.9	45.9	43.1	63.9	-9.3	-19.6	11.0	-16.8%	-31.3%	20.8%
11 to 5	Rochester	Tilbury	43.2	66.3	39.1	32.9	37.7	52.5	-10.3	-28.6	13.4	-23.8%	-43.1%	34.3%
12 to 5	Rainham	Tilbury	58.7	81.7	43.1	50.2	53.1	56.8	-8.5	-28.6	13.7	-14.5%	-35.0%	31.8%

Movement	2045 Inter Peak		DM			DS			Difference			Difference %		
	From	To	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance	Time	Speed
5 to 7	Tilbury	Bexley	28.3	31.4	54.1	28.3	28.2	60.2	0.0	-3.2	6.1	0.0%	-10.2%	11.3%
5 to 8	Tilbury	Godstone	58.0	49.3	70.6	58.0	46.0	75.7	0.0	-3.3	5.1	0.0%	-6.7%	7.2%
5 to 9	Tilbury	Southfleet	28.6	29.0	59.2	27.7	19.9	83.8	-0.9	-9.1	24.6	-3.1%	-31.4%	41.6%
5 to 10	Tilbury	Maidstone	54.6	45.8	71.6	41.9	32.8	76.8	-12.7	-13.0	5.2	-23.3%	-28.4%	7.3%
5 to 11	Tilbury	Rochester	41.0	43.0	57.1	29.3	27.9	63.0	-11.7	-15.1	5.9	-28.5%	-35.1%	10.3%
5 to 12	Tilbury	Rainham	57.9	51.0	68.1	46.4	36.0	77.3	-11.5	-15.0	9.2	-19.9%	-29.4%	13.5%
7 to 5	Bexley	Tilbury	31.9	41.3	46.4	31.9	33.0	58.1	0.0	-8.3	11.7	0.0%	-20.1%	25.2%
8 to 5	Godstone	Tilbury	62.1	62.3	59.8	62.1	54.5	68.4	0.0	-7.8	8.6	0.0%	-12.5%	14.4%
9 to 5	Southfleet	Tilbury	31.1	40.7	45.7	34.8	28.4	73.5	3.7	-12.3	27.8	11.9%	-30.2%	60.8%
10 to 5	Maidstone	Tilbury	58.6	58.1	60.6	49.2	39.7	74.4	-9.4	-18.4	13.8	-16.0%	-31.7%	22.8%



2045 Inter Peak			DM			DS			Difference			Difference %		
Movement	From	To	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance	Time	Speed
11 to 5	Rochester	Tilbury	44.8	58.5	45.9	36.2	36.1	60.3	-8.6	-22.4	14.4	-19.2%	-38.3%	31.4%
12 to 5	Rainham	Tilbury	62.0	66.7	55.8	53.6	43.9	73.2	-8.4	-22.8	17.4	-13.5%	-34.2%	31.2%

2045 PM Peak			DM			DS			Difference			Difference %		
Movement	From	To	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance (km)	Time (mins)	Avg Speed (km/h)	Distance	Time	Speed
5 to 7	Tilbury	Bexley	28.3	37.8	45.0	28.3	32.7	52.0	0.0	-5.1	7.0	0.0%	-13.5%	15.6%
5 to 8	Tilbury	Godstone	58.0	52.5	66.2	58.0	47.2	73.7	0.0	-5.3	7.5	0.0%	-10.1%	11.3%
5 to 9	Tilbury	Southfleet	27.2	34.2	47.8	27.7	21.3	78.2	0.5	-12.9	30.4	1.8%	-37.7%	63.6%
5 to 10	Tilbury	Maidstone	54.6	55.4	59.2	51.9	39.9	63.0	-2.7	-15.5	3.8	-4.9%	-28.0%	6.4%
5 to 11	Tilbury	Rochester	41.3	55.1	45.0	29.8	34.5	51.7	-11.5	-20.6	6.7	-27.8%	-37.4%	14.9%
5 to 12	Tilbury	Rainham	57.9	70.6	49.2	46.4	50.0	55.6	-11.5	-20.6	6.4	-19.9%	-29.2%	13.0%
7 to 5	Bexley	Tilbury	28.6	41.0	41.8	28.6	32.5	52.7	0.0	-8.5	10.9	0.0%	-20.7%	26.1%
8 to 5	Godstone	Tilbury	58.2	65.0	53.7	58.2	57.3	61.0	0.0	-7.7	7.3	0.0%	-11.8%	13.6%
9 to 5	Southfleet	Tilbury	27.7	38.6	43.0	31.4	27.4	68.7	3.7	-11.2	25.7	13.4%	-29.0%	59.8%
10 to 5	Maidstone	Tilbury	55.2	57.8	57.3	45.9	42.2	65.2	-9.3	-15.6	7.9	-16.8%	-27.0%	13.8%
11 to 5	Rochester	Tilbury	41.4	65.9	37.7	32.9	39.8	49.6	-8.5	-26.1	11.9	-20.5%	-39.6%	31.6%
12 to 5	Rainham	Tilbury	58.7	71.5	49.2	50.2	44.7	67.5	-8.5	-26.8	18.3	-14.5%	-37.5%	37.2%