

TR010032 Lower Thames Crossing
UPDATED Gravesham response to Issues raised by National Highways on LIR
Submission at Deadline 4
(IP ref: 20035747)

Notes

- This is an additional material to the version submitted at Deadline 3 [[REP3-166](#) with appendices [REP3-164](#) and [REP3-165](#)]
- The additional material includes only content on:
 - Transport matters – set out below in the main table format
 - Appendix 3 Landscape
- For ease of reference each item has been given a reference – GL1.1 etc
- The subject and NH comment columns are the briefest of summary and reference should be made to the original to understand the detail of the subject or the comment made upon it

Ref #	LIR Ref	Subject	NH comment	GBC response
	Section 1		Introduction	
	Section 2		Project Description	
	Section 3		Traffic	
GL3.1	3.1	Traffic impacts	Detailed responses to specific points	The assessments referred to by the applicant have been considered. The A2 is noted to carry less traffic east of the A122 junction. Simplistically this only traffic using the A2 to access the Dartford Crossing and all local other traffic will continue to use the A2. East of the junction the flow increases as a result diverting traffic off the M20. The rat running appears on the modelling to shift east (i.e. coming up from Cuxton). Sole Street/Istead Rise has an increase from A227 via Meopham to access LTC via the Marling Cross junction
GL3.2	3.4	Traffic impacts	Beneficial effects of LTC	The LTC modelling shows that, as noted above, that the mainline flow on the A2 does decrease west of the A122 junction. Work for KCC show that the conditions on junctions all worsen. These are all already under stress, if traffic from Gravesham (urban or rural) cannot access the A2, it cannot benefit from the traffic reductions.

GL3.3	3.5	Traffic impacts	Construction impacts and traffic management	The Council welcomes the comments about appointing a traffic manager and the various mechanisms for local engagement. It has yet to be convinced that these are sufficiently robust and reactive to ensure the inevitable impacts are minimised. In particular there needs to be real time monitoring publicly available to ensure transparency for local road users.
GL3.4	3.7	Traffic impacts	Local Plan – LIR para’s 1.65-1.67	No further comment. The project does not meet the local development objectives and therefore cannot claim to provide substantial economic benefits to Gravesham and wider to North Kent.
GL3.5	3.10	Traffic impacts	Road connections at Marling Cross	As stated in the Examination (ISH) the Council wished to see all connections in the current plans retained. A much simpler junction (as proposed in 2016) would obviate the need for so much complexity.
GL3.6	3.14	Traffic impacts	Cross river flow capacity	Figures quoted in the Gravesham LIR come from back calculation of % capacity and PCU flows from transport modelling supplied in April 2021. These differ slightly from those shown in table 8.12 Combined Modelling and Appraisal Report Appendix C (APP-522). Different model runs will produce slightly different outputs, but the basic point of the crossing likely to fill up again remains valid.
GL3.7	3.17	Traffic impacts	Route selection	Basic comments not addressed by applicant
GL3.8	3.18	Traffic impacts	Environmental assessment	Basic comments not addressed by applicant

GL3.9	3.19	Traffic impacts	Public transport	Just highlights new possibilities from crossing does not address more radical option. KCC comment assumes that the Dartford Crossing relief would reduce disruption, and therefore impact on existing public transport in the area. The applicant's own figures show that whilst there is short term relief at the crossing, which is accepted, however in the longer term congestion returns. Issues with the tunnels as seen on ASI1 suggest that the congestion will continue to occur, though HGV volume is forecast to be reduced.
GL3.10	3.20	Traffic impacts	Public transport across the river	The comments essentially put the issue back on the local authorities who have little or no funding to expand capacity. The expansion of ferry services during construction would be a matter for National Highways.
GL3.11	3.21	Traffic impacts	HGV access to ports	The analysis given is for the current position whereas the comments assume a significant change in policy.

GL3.12	3.24	Traffic impacts	<p>A122/A2 junction complexity</p> <p>This also picks up Action Point 1 from ISH3 (EV-041f)</p>	<p>Plans submitted by applicant (AS-145) shows how complex the routing through the junction is and some of ExQ1 questions highlight the issue of what happens to a motorist who does make a mistake. Many users will get to know the junction, but the infrequent driver may find it confusing as the plans indicate.</p> <p>Slides 19 & 20 show routing from Valley Drive to Cobham via A2/Darnley Lodge Lane and Halfpence Lane. In both existing and with LTC worlds routing via Henhuirst Road is equally likely (depending on final destination).</p> <p>Slides 23 and 24 also illustrates the complexity of access for Shorne residents.</p> <p>One obvious change would be to clearly label A2 central lanes to/from Marling Cross diverge to the current start of M2 as M2. dDCO (REP3-022) and 2.11 Classification of Roads Plans (Rep3-061) appear to make both the 4 lanes to M2 and the link to the A289/A2 (local road) as A2.</p>
GL3.13	3.27	Traffic impacts	Macro traffic impacts	Applicant does not dispute the issues being raised (which are questions)
GL3.14	3.28	Traffic impacts	Distance from M20 to A282	Noted

GL3.15	3.29	Traffic impacts	M2 J1 Three Crutches	Refers to REP1-183 para A.4.4 – A.4.7 which sets out that National Highways has to make difficult choices but that the overall benefits of the project outweigh any local impacts (para A.4.6). This is not the test that is applied to Local Plans or planning applications by National Highways. A neutral impact is a reasonable expectation at worst otherwise the Government's growth agenda is being thwarted. This suggests that the benefits to North Kent claimed by the applicant will not be realised because the highway capacity to support the development (even allowing for public transport interventions) is not there on the basis of its own modelling.
GL3.16	3.30	Traffic impacts	Blue Bell Hill	Applicant supports KCC scheme – and that therefore it accepts that something needs to be done but does not ensure that it is. It is noted that under ISH7 Action Point 7 (EV-46e) a workshop is to be held with Kent County Council on Blue Bell Hill.
GL3.17	3.31	Traffic impacts	Casualties	Lower casualties on the M20 and M25 are a result of moving traffic onto LTC, which shows increases elsewhere. Logically more road (and complex junction) implies more incidents.
GL3.18	3.32	Traffic impacts	Blue Bell Hill	See GL3.16 above
GL3.19	3.33 & 3.34	Traffic impacts	Rat running	Response talks about emergency services access and managing the network. This is acknowledged but does not address the fundamental problem for local residents and businesses.

GL3.20	3.35	Traffic impacts	Modelling does not address de facto impact of congestion	As stated by the applicant LTAM is a steady state model that therefore avoids incidents. However from the users and local residents point of view these are 'regular' events in that disruption to the network from congestion (most days at am peak London bound from Marling Cross west to Bean (3 lanes through junction). Modelling shows a reduction on the A2 traffic past Gravesend but moves the focus of congestion further east.
GL3.21	3.37	Traffic impacts	Resilience	Applicant has still not addressed the issue of what might happen of one or other of the crossings is closed. QE2 bridges shuts 2 or 3 days a year due to wind (which may increase with climate change) or Dartford tunnels northbound from a number of causes. ASI1 visit to the control centre showed how that operates.
GL3.22	3.38	Traffic impacts	Business case	Response does not address the issues
GL3.23	3.39	Traffic impacts	Economic benefits	The applicant has misunderstood the comments. It was accepted that there would be some positive economic benefits, simply because of increased cross river connectivity and the start of the paragraph is a summary of their case. What has been made clear is that it hard to see what the positive benefits actually are (e.g. what sites are developed as a result of LTC) and that such benefits have to be set against the disbenefits, many of which are not capable of economic analysis.

GL3.24	3.40	Traffic impacts	Sensitivity testing	9.10 Post-event submissions, including written submission of oral comments, for ISH1 (REP1-183) H.2. The Council thanks the Applicant for carrying out the suggested test on time sensitivity, and the resulting changes to the BCR. The minimum value of time should be considered the worst case. The lesson to be drawn from the result is the surprising sensitivity of the results to this factor when altered. The Council would submit that for the ExA to have confidence in the analysis in the submitted application it needs up to date evidence that the values for time being used are appropriate.
GL3.25	3.41	Traffic impacts	Sensitivity testing WebTAG	9.10 Post-event submissions, including written submission of oral comments, for ISH1 (REP1-183) H.2. See above GL3.23
GL3.26	3.42	Traffic impacts	LTAM strategic model	The Council has made it clear it understands what the LTAM is designed and calibrated for. The criticisms are of it being used for functions it is not designed for. These include to examine the impact on the local highway network (hence the discussion on microsimulation modelling). The issues around Orsett Cock junction on the A13 illustrate this well and give rise to similar concerns around the A2/A122 junction for which there is evidence from the WSP work for Kent CC. The problem is the lack of evidence to substantiate or reassure as appropriate. Further the applicant has not tested the model unconstrained using potential development levels being asked for by Government. The response on M2 J1 issue illustrates this well – some nebulous greater good.

GL3.27	3.43	Traffic impacts	Local Plan modelling	The council has had to spend significant sums of the money on modelling exercise for the Local Plan, using the KCC Model. The applicant states that LTAM is not suitable for this purpose. It follows therefore that the LTAM is not an appropriate model for analysing the local impacts of the project and therefore it cannot substantiate any of the claims made as to the local benefits for the Gravesham local economy.
GL3.28	3.44	Traffic impacts	Development input to model	Validates the comments made above
GL3.29	3.45	Traffic impacts	Local impacts on existing base	Noted
GL3.30	3.47	Traffic impacts	NTEM impact	Agree that the model will allow trips that might not otherwise take place, but that does not alter the scale of the differences in quantities highlighted

GL3.31	3.48	Traffic impacts	NTEM constraint	A primary purpose of TAG is to provide a Treasury Green Book compliant assessment of projects to inform investment decisions. Whilst the NPSNN (2014) refers to TAG in the context of policy and decision making, the requirements of the EIA Regulations also apply in that the applicant is required to provide an assessment of significant environmental effects on a realistic worst case basis. If Government is requiring that local authorities deliver higher levels of development than assumed in the NTEM, then transport assessment based on TAG may under-estimate the severity of those impacts even under a Core Scenario, with a marginal uplift for higher growth. This is because the LTAM outputs feed directly into environmental modules. Requesting sensitivity testing to understand the implications of growth based on the Government's imposition of the Standard Method is therefore justified in EIA and Appropriate Assessment terms.
GL3.32	3.49	Traffic impacts	Noise and Air Quality	These are a direct product of the traffic levels, after taking due account if the impacts of decarbonisation and electrification. The Council has accepted the broad methodology employed, but by definition has to reserve its position on the results.
GL3.33	3.51 & 3.52	Traffic impacts	ES	The Council has not agreed the SoCG, but equally has not disputed that that applicant needs to do analysis on the WebTAG et al. What the applicant is being asked to do is the analysis appropriate for an EIA in these circumstances.

GL3.34	3.53	Traffic impacts	Tilbury Link Road	The Council's view is that a junction is being provided at Tilbury that could serve a link road that the applicant is exploring, and Thurrock Council and Port of Tilbury want. The travel time data suggests that travel to Tilbury Docks (and other locations) from the south is very sensitive as to which crossing is used, it is therefore entirely appropriate to ask for modelling to show what the impact of such a link might be.
GL3.35	3.54	Traffic impacts	Long term monitoring	A more comprehensive monitoring framework is required to address issues that may arise on the highway network (if caused by LTC)
GL3.36	3.55	Traffic impacts	Local gains	Noted
GL3.37	3.57	Traffic impacts	A2 junctions	Noted
GL3.38	3.59	Traffic impacts	A2 junctions	Impacts on local junctions from LTC will need to be addressed
GL3.39	3.60	Traffic impacts	Local road network	Monitoring and a commitment to dealing with any impacts from LTC required
GL3.40	3.61	Traffic impacts	Relief to Dartford Crossing	The applicant's own figures show that Dartford Crossing will continue to experience congestion after a period of some relief
GL3.41	3.63	Traffic impacts	Impact on wider network	Noted
GL3.42	3.60	Traffic impacts	Traffic increases on M2 etc.	Noted
GL3.43	3.65	Traffic impacts	Use of A122	Noted
GL3.44	3.66	Traffic impacts	A228 impact	Noted
GL3.45	3.67	Traffic impacts	Local roads	Noted
GL3.46	3.68	Traffic impacts	Junction operation	Noted

GL3.46	3.69	Traffic impacts	Henhurst Road	Noted
GL3.47	3.70	Traffic impacts	Sensitivity of results on minor roads	Noted
GL3.48	3.71	Traffic impacts	Emergency Services	Noted – detail is an Emergency Services Group matter
GL3.49	3.72	Traffic impacts	RVP	More information need on RVP facilities and management (given that most of the time it will not be used but has to be available)
GL3.50	3.75	Traffic impacts	Economic benefits	Noted
GL3.51	3.76	Traffic impacts	Affordability	Noted
GL3.52	3.77	Traffic impacts	BCR	Business case fragile – see above
GL3.53	3.78	Traffic impacts	Minimisation of impacts	Noted
GL3.54	3.79	Traffic impacts	Relief at Dartford	See previous comments on this subject
GL3.55	3.80	Traffic impacts	Resilience	Still no evidence has been provided as to how the highway network might response to a closure on one of the crossings
GL3.56	3.81	Traffic impacts	Complexity of A2/A122 junction	Noted
	Section 4		Construction Traffic	
	Section 5		Air Quality	
	Section 6		Cultural Heritage	
	Section 7		Landscape and visual	
			LIR Landscape Appendix 7	
GL7.32	Ap 7.4	Changes to landscape assessment	Maintains position on ES Chapter 7 as submitted	See Gravesham NH LIR comments Appendix 3 Landscape

GL7.33	Ap 7.6.5	Landscape Assessment	Chapter 7 as submitted is to correct methodology and the old (2020) version is not relevant	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.34	Ap 7.6.6	Changes to Cobham and Shorne LLCA's	Boundary change not significant	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.35	Ap 7.7.2	West Kent Downs and Gravesend Southern Fringe	Detailed comments on Table 7.1	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.36	Ap 7.7.6(ii)	Cultural heritage	Wider Cobham Estate	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.37	Ap 7.7.6(iii)	Brewers Road roundabout	Reinstatement will occur of any losses	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.38	Ap 7.7.9 (ii)	Impact of the scheme on AoNB	Refer to APP-384 6.3 Environmental Statement - Appendix 7.9 - Schedule of Landscape Effects	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.39	Ap 7.7.9(iii)	Impact on historic parkland	Refer to APP-384 6.3 Environmental Statement - Appendix 7.9 - Schedule of Landscape Effects	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.40	Ap 7.7.9 (iv)	Replacement/mitigation planting	See comments on 7.14.4(ii) and following below (GL7.48)	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.41	Ap 7.8.3	Construction sites visual impact	Refer to APP-140 , APP-145 , APP-204 , APP 243 , APP-385 , & REP1-157	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.42	Ap 7.10.1	GBC Table 7.2	Detailed comments	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.43	Ap 7.10.2	Lighting impacts	Detailed comments	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.44	Ap 7.12.1(vi)	Extent of impacts	Refers to APP-145 & APP-154	See Gravesham NH LIR comments Appendix 3 Landscape

GL7.45	Ap 7.13.4	Assessment of sensitivity VP1	Refer to APP-235 & APP-388	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.46	Ap 7.13.5	Assessment of sensitivity VP2	Refer to APP-384 & APP-388	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.47	Ap 7.13.6	Views from Road	No view form the road currently	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.48	Ap 7.14.4(ii)	Native planting	Refer to APP-516	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.49	Ap7.14.(iv) & (v)	Screen planting	Planting is proposed to replicate existing landscape and patterns	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.50	Ap 7.14.4 (vi) & (xi)	Screening with time	See response to 7.10.1 (GL7.42)	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.51	Ap 7.14.6 (i) – (iii)	Ancient woodland compensation	Refer to oLEMP REP1-173	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.52	Ap 7.14.6 (iv)-(vii)	Comprehensive mitigation strategy	Refer to APP-509	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.53	Ap 7.15.3 (i)	Green Bridges	Refer to, APP-146, APP-384 , APP-385 , APP-509, APP-516 & REP1-173	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.54	Ap 7.15.5 (i) – (iv)	Impact on Kent Downs AoNB	Refer to APP-384 & APP-385	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.55	Ap 7.15.6 (i)	A122 junction and its setting	Additional cross sections shared	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.56	Ap 7.15.7 (ii) & (iii)	Park Pale	Refer to APP-384 & APP-385	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.57	Ap 7.15.7 (iv)	Park Pale	No justification for Green Bridge at Park Pale	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.58	Ap 7.15.8 (iii)	East of Thong	Refer to APP-516 & REP1-173	See Gravesham NH LIR comments Appendix 3 Landscape

GL7.59	Ap 7.15.9 (vi (a))	Chalk Park	Refer to REP1-042 & REP1-173	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.60	Ap 7.15.9 (vi(b))	Hill top in Chalk Park	Performs a variety of functions – see APP-516	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.61	Ap 7.15.9 (vi(c))	Infiltration basins	Refer to APP-516	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.62	Ap 7.16.1 (i)	Photomontages	Agree locations in 2019	See Gravesham NH LIR comments Appendix 3 Landscape
GL7.63	Ap 7.16.2 (iii)	Visual imagery	3D flythrough provided	See Gravesham NH LIR comments Appendix 3 Landscape
	Section 8		Terrestrial Biodiversity	
	Section 9		Marine Biodiversity	
	Section 10		Geology and Soils	
	Section 11		Material Assets and Waste	
	Section 12		Noise and vibration	
	Section 13		Population and human health	
We note that NH have not responded on 13.62 to 13.75				
	Section 14		Road drainage and the Water Environment	
	Section 15		Climate	
	Section 16		Cumulative Effects	