



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 TRAFFIC AND TRANSPORT SUBMISSIONS MADE AT DEADLINE 6

Deadline 6A: 14 November 2023

1. INTRODUCTION

- 1.1 The Port of Tilbury London Limited (PoTLL) has undertaken a review of the traffic and transport documents provided by the Applicant at Deadline 6.
- 1.2 Broadly, PoTLL considers that its submission at Deadline 6 [REP6-163] provides an appropriate response to the Applicant's submissions in the Wider Network Impacts Position Paper [REP6-092], and the draft Orsett Cock Requirement provided by the Applicant in the latest version of the draft DCO [REP6-011]. PoTLL also notes that the Applicant has not had an opportunity to comment on PoTLL's proposed revisions to the Applicant's Tilbury Link Road Requirement and therefore makes no further submissions on it at this time.
- 1.3 In respect of the draft Requirements, PoTLL refers to the joint statement between Thurrock Council, DP World London Gateway, Thames Enterprise Park and PoTLL, submitted by PoTLL at Deadline 6A. The joint statement confirms that the drafting of the Requirements relating to ASDA Roundabout, Orsett Cock Junction and Wider Network Impacts is now agreed by each of these Interested Parties. Please refer to the Joint Statement for further information.
- 1.4 Thurrock Council has also submitted its own version of a Tilbury Link Road Requirement – PoTLL's position is that it considers that its own version of that Requirement, submitted at Deadline 6, provides sufficient certainty of the outcomes that PoTLL wishes to see in respect of the LTC scheme facilitating the delivery of Tilbury Link Road in the future.

2. 9.158 APPLICANT'S SUBMISSIONS ON CONSTRUCTION IMPACTS AND MANAGEMENT AT ASDA ROUNDABOUT [REP6-123]

- 2.1 The Applicant has provided a detailed response to PoTLL's submissions in respect of the ASDA roundabout and concerns around the impacts of LTC construction traffic on that junction. Within this document, the Applicant has sought to demonstrate that physical mitigation at the ASDA roundabout is not necessary during Phase 1 of construction, based on a detailed breakdown of how the works requiring traffic regulation measures that result in congestion at the junction could be managed so as to avoid these impacts.
- 2.2 PoTLL welcomes this level of detailed assessment, but notes that this is tied to the outline Scheme for which development consent is sought and current modelling by the Applicant. It will be necessary to repeat this level of detailed assessment (including in relation to the programming of mitigation measures) once the detailed design, the known construction traffic volumes and the construction programme have been identified.
- 2.3 PoTLL recognises that it may be possible for impacts at this junction to be mitigated without the need for physical intervention at the junction. However, PoTLL maintains its position that physical mitigation should be considered at this stage of the consenting process in order to ensure that, in the event construction impacts cannot be managed as the Applicant proposes, there is scope to provide greater intervention and that this can be delivered without causing an overall impediment to the delivery of the Scheme. The Mitigation Scheme submitted by PoTLL demonstrates that comprehensive physical mitigation is possible, resulting in significantly improved traffic flows through the ASDA roundabout; however, this should be viewed as a proof of concept, providing comfort that mitigation is possible within the highway boundary, rather than a settled mitigation scheme that will in all cases be required and appropriate.
- 2.4 It is PoTLL's view that its proposed draft Requirement for the ASDA roundabout (see Appendix 3 of PoTLL's submission [REP6-163]) requires only that the Applicant carries out a similar exercise to that included in this submission on construction impacts, once the detailed design and construction programme have been settled. It is only where it cannot be demonstrated that the impacts can be managed and mitigated without intervention that physical mitigation and an agreed scheme is necessary. The Requirement goes further in requiring monitoring to ensure that the planned mitigation is effective and necessary outcomes secured and maintained, something that is currently lacking from the draft DCO.

- 2.5 As noted, PoTLL welcomes the additional detailed assessment of Construction Period 1 that has been provided and that this will necessarily be required, in a more comprehensive form, at the detailed design stage of the Scheme. However, the assessment set out at Table 4.1 is optimistic in terms of the works that could be undertaken without impacting upon the carriageway. The Applicant has assumed that works on footways and verges do not necessitate carriageway works. However, this assumes that there will be no constraints on works in the verge or footway, such as where pedestrian routes are to be maintained, or in relation to the need to manage the environmental impacts of works in heavily vegetated verges. The assessment also assumes a narrow working width of 600mm (see paragraph 4.2.4). The assessment in Table 4.1 should be viewed cautiously and PoTLL does not accept its findings.
- 2.6 At section 5.22, the Applicant sets out its proposed approach to further assessment. This will disaggregate between traffic reassigning due to temporary traffic management (TTM) and that arising from the construction of the LTC scheme. There will be a test to remove construction vehicles, intended to assess whether it is the TTM or the construction vehicles that are causing the impact. It is assumed (although this is not stated) that the LTAM model will be used to generate future year traffic flows for input to the Arcady (now known as Junctions) model. However, it is not clear whether any adjustment to the LTAM model will be made to reflect the traffic flow data at the ASDA roundabout, provided to the Applicant by PoTLL. Without proper adjustment, the LTAM would not correctly forecast future changes on the network.
- 2.7 The parameters proposed to be used in the Arcady (Junctions) assessment have not been provided and PoTLL has not been able to comment on these. PoTLL will review the further submission by the Applicant at Deadline 6A with a view to providing comments.
- 2.8 PoTLL notes that the Applicant's own initial modelling of PoTLL's mitigation scheme identifies increases in traffic flow on the A1089 through the ASDA roundabout. This clearly shows that the additional capacity provided by the scheme of mitigation attracts traffic, and in particular construction traffic, that is avoiding the ASDA roundabout due to the delay it would experience with the current layout. In the absence of mitigation, this traffic would be routing via unsuitable local roads.
- 2.9 The initial modelling of PoTLL's mitigation scheme was also for the AM peak hour of 07:00 to 08:00 only. The PM peak has not been assessed.
- 2.10 Finally, PoTLL notes that paragraph 5.1.3 of the Applicant's submission advises that a further assessment of traffic impacts at the ASDA roundabout during construction, supported by a programme of modelling, will be provided at Deadline 6A.
- 2.11 PoTLL confirms that it has shared its traffic monitoring data from 2018 with the Applicant in order that it may use this data within that further modelling. PoTLL hopes that this will address the concerns raised by PoTLL and Thurrock Council about the modelling of this junction to date, found at Appendix B to [REP5-112].
- 2.12 PoTLL is mindful of the limited time between Deadline 6A on 14 November 2023 and Deadline 7 on 17 November 2023, and that the further information relating to the ASDA roundabout is likely to be a significant, technical document. PoTLL will seek to review this immediately upon it being published on the PINS website, however it may not be possible to provide a detailed commentary on it for Deadline 7, albeit PoTLL will submit comments in some form at that deadline.
- 2.13 PoTLL anticipates being able to provide comments for Issue Specific Hearing 13 on Traffic and Transportation, to be held on 27 November 2023, and providing detailed submissions at Deadline 8 on 5 December 2023.