

Gravesham Borough Council

(IP ref: 20035747)

Lower Thames Crossing

Deadline 6a submission

1. The Borough Council, not being a Highway Authority, is waiting to see what is submitted by the applicant and Interested Parties at Deadline 6a and will make appropriate comment at ISH13 or subsequently in writing.
2. That said it is possible to stand back from the detailed issues and look at where the wider debate has reached. In doing this [REP6-092](#) 9.134 Wider Network Impacts Position Paper is taken as the applicants most recent submission in this area. This note does not seek to analyse that document in detail, rather the Council wishes to make the following points:
 - a. The Lower Thames Area Model (LTAM) is the primary tool used to assess the transport impacts. LTAM is however not well suited at looking at local road impacts as it is designed to look at the wider strategic network
 - b. It does show that the claimed benefit at the Dartford Crossing is short lived as set out in previous submissions.
 - c. Based on the Orsett Cock junction microsimulation modelling work, as currently understood, there is a discrepancy between what that is showing, and the outputs derived from LTAM on the actual levels of congestion as discussed at ISH 04 & 10. Gravesham has an interest in this in respect to two issues. Firstly from the point of view of access from south of the river to the Tilbury/Grays area by residents and businesses of Gravesham it is important to understand whether the Orsett Cock junction, as a key node, will function effectively, and, secondly, if there are fundamental issues at that location because of a mismatch between the LTAM outputs and the more detailed microsimulation modelling, what does this mean for the accuracy of the LTAM modelling of other junctions, and, at the very least, this uncertainty raises concerns about the confidence the Council should have in the impact identified.
 - d. Kent County Council, as the Local Highway authority for the local road network within Gravesham, did not initially, unlike Thurrock Council, commission micro-simulation modelling to be undertaken and rather accepted the material provided by National Highways.
 - e. More recently KCC has commissioned modelling from WSP, using the KCC Model, and this has raised significant concerns about several junctions along the A2 about the potential impacts arising from the project on the local highway network. A further iteration of this work is due imminently which will help clarify the current position.
 - f. The issue of funding a scheme for Blue Bell Hill has not been resolved, so that the highway impacts must be considered on the context of a lack of a scheme on the A229, with consequential implications for A228, A227 and various minor roads.

- g. The applicant has twice tried to argue that it has no responsibility for the impacts on local roads based on its interpretation of the NPSNN. The Borough Council, as have other Interested Parties in their submissions, has made it clear that the applicant is in no different position to any other developer and needs to address the impacts in the round. Different topic areas have different approaches, but the overall test is clear as part of striking the overall planning balance.
 - h. As the technical work has shown there are considerable uncertainties over what the impacts will be which are a product of introducing a major new link in the highway network that is also, at peak times, seriously congested. Local residents and businesses are concerned about the day to day impacts (and benefits) to them, not wider amorphous claimed benefits. The Council does find National Highways position across the differing environmental topic areas inconsistent and difficult to understand i.e. for biodiversity on 23 October 2023 (ISH9) the ExA were told¹ "Its monitoring is integral to that management. You can't really undertake management without appropriate monitoring because you don't know what actions you need to put in place to appropriately manage that habitat. So the management and the monitoring go hand in hand". The Council considers that this is as applicable to local road monitoring in order to manage the impacts of the scheme on the highway network as it is to habitat monitoring in order to manage the impacts of the scheme on local habitats.
 - i. What is being called the 'Silvertown' approach provides a framework for evaluating the actual impacts (which may vary from what the modelling shows). This is not a simple process since there will many other changes occurring that impact on the network. The most important step is to have framework within which discussions can occur with a commitment to taking action where necessary. At any given location this might involve a cocktail of funding for a scheme to address development impacts, LTC impacts and existing issues. The draft requirement set out in section 4.2 (page 31) of [REP6-092](#) is still be analysed and further comment will be made as appropriate
3. The Council has raised a number of issues about the overall modelling including the lack of a sensitivity test using development quantities which reflect the housing projections derived from using the DLUHC standard method. Nowhere has the Applicant provided a specific response to this request or explained why it is robust to place wholesale reliance on data that is used in NTEM which is demonstrably out of date in the local context due to the age of the local plans and monitoring reports that were used to inform the NTEM projections. The assertion that the 'wider benefits' justify negative impacts does not stand up to analysis where (a) it is not apparent that the negative impacts have been identified using the most up to date information on levels of expected housing growth and (b) it results in local planning authorities being unable to meet the expectations placed upon them by Central Government because the local road network will not have the capacity to cope with the required scale of growth. In the Borough Council's view the Applicant's approach is the antithesis of joined up planning and does not present a comprehensive or robust picture of the overall transport impacts of the scheme.

14 November 2023

¹ EV-074 - page 28 lines 8-12