

**Application by Port of Tilbury London Limited for an Order Granting Development Consent for a Proposed Port Terminal at the Former Tilbury Power Station ('Tilbury2')**

**Deadline 2**

**Highways England Response to Essex County Council's Response to First Written Questions**

<b>FWQ</b>	<b>Question</b>	<b>Essex County Council's Response</b>	<b>HE Comments</b>
1.18.1	Regarding Network Rail's need [RR-013] to have agreements in place to safeguard Network Rail's interests and the safety and integrity of the operational railway:		
	a) What is the current position between Network Rail and the Applicant?		
	b) What matters remain to be resolved?		
	c) Can Network Rail confirm that it will table a Statement of Common Ground with the Applicant at Deadline 1 (20 March 2018)?		
	d) Is Network Rail content with the Protective Provisions in dDCO Schedule 10 Part 6 For the Protection of Railway Interests?		
1.18.2	With reference to Royal Mail's interests [RR-029] and its request for the Applicant to give careful consideration to potential cumulative construction traffic impacts and remediation measures to mitigate adverse impacts on the capacity of the highways network; to acknowledge the requirement to ensure that major road users are not disrupted through full consultation at the appropriate times during the DCO and development		

		processes; and to fully consult Royal Mail in advance on the Construction Environmental Management Plan (CEMP) and name Royal Mail in the list of transport operators for consultation on usage of the network:		
	a)	What is the current position between Royal Mail and the Applicant?		
	b)	What matters remain to be resolved?		
	c)	How does Royal Mail envisage its needs being met in the dDCO?		
1.18.3		With reference to ECC's relevant representation [RR-018]:		
	a)	Would ECC give more detail on its outstanding concern regarding M25 J30 on which the Council requires further clarification?	<p>Please find below ECC's responses to points a) and d)</p> <p>ECC however, acknowledges the PoTLL response provided in the Response to Relevant Representations document, stating that M25 J30 is the responsibility of HE, rather than ECC and that the PoTLL is in direct discussions with HE regarding the impact of Tilbury2 on this junction.</p> <p>To assist, the ECC request for clarification is to receive confirmation that Highways England as the responsible highways authority for the strategic road network (namely the M25 J30) are satisfied that the junction has been given due consideration and that the impact of traffic generated by Tilbury2 will either not have an impact on the operation of the junction or that the impact can / will be mitigated.</p> <p>ECC also notes that the Highways England Relevant Representation has also raised questions on this matter.</p> <p>ECC provided POTLL with this clarification on the 16<sup>th</sup> March 2018 and consider this matter to be outstanding.</p>	HE are awaiting further information to address outstanding queries with the applicant regarding the trip generation of the Proposed Development and changes in traffic levels at M25 Junction 30. Once this has been resolved, HE will then be able to form a view on the impact of the Proposed Development at M25 Junction 30 and whether any mitigation is required at this junction.
	b)	Would the Applicant and HE state their response to ECC's request for them to take account of respective proposals to ensure junction capacity?		
	c)	Would the Applicant state its response to ECC's request for clarification, information and mitigation concerning		

		sustainable travel modes and provision of public t		
	d)	Would the Applicant and NR state their response to ECC's request for clarification on the cumulative impacts on the rail network, passenger and freight capacity, connectivity and network resilience between Essex and London?	To assist, ECC's request is for clarification that Network Rail, as the responsible authority, has considered the cumulative impacts of freight growth (PoTLL growth plus other planned freight growth) and passenger growth both on the Essex Thameside line and North London Lines (including Gospel Oak to Barking), including reflecting the aspirations for increased passenger services contained within the Draft London Plan and Mayor's Transport Strategy. ECC would also like NR to confirm which, if any, of the enhancements projects listed within the Freight Route Study are necessary to support the operation of Tilbury2. ECC also notes that the Relevant Representations from Network Rail Infrastructure Ltd and Kent County Council also raised questions on this matter.	Highways England is concerned that any shortfall in rail capacity might result in increased use of Heavy Goods Vehicles to service the Proposed Development. Highways England will monitor this issue and depending on the outcome may seek a review of the Transport Assessment.
1.18.4		With reference to GBC's concern [RR-019] to see a SoCG between the Applicant and HE agreed to ensure that the traffic impacts on Gravesham "generated by the Port of Tilbury by virtue of the Lower Thames Crossing once built, are comprehensively modelled and mitigated for and don't fall between these 2 NSIP projects":		
	a)	What are the Applicant's and HE's response to this concern of GBC?		
1.18.5		With reference to HE's relevant representation [RR-020], in which HE raises a number of concerns:		
	a)	What is HE's assessment of the fitness for purpose of the Transport Assessment (cited in ES [APP-031] Chapter 13 paragraph 13.3 et seq), including its compliance with WebTAG?		
	b)	What is the Applicant's response to HE's request for justification of the absence of proposed mitigation works at certain locations, namely A1089/A126		

	(Marshfoot Road junction), A1089/A13 merge and M25 junction 30?		
	c) What is HE's current position on the effects of the Proposed Development on the strategic road network and whether they can be can be mitigated so that the residual impacts are not severe?		
	d) Re HE's assertion that circular 02/2013 requires developers' proposals to comply with the Design Manual for Roads and Bridges, does the Applicant agree with this assertion?		
	e) Would the Applicant and HE state the extent to which the Proposed Development complies with the DMRB, and highlight all areas in which it does not comply?		
1.18.6	The ES [APP-031] Chapter 13 paragraph 13.3 et seq cite the Transport Assessment [APP-072], the Framework Travel Plan [APP-073], and Sustainable Distribution Plan [APP-074]. The latter two documents are secured within the dDCO [APP-016] Schedule 2 Part 1 by Requirement 11:		
	a) Would the Applicant state where the Transport Assessment is secured in the dDCO?		
	b) Would ECC and TC state whether they are content with the Transport Assessment as currently drafted?	<p>Please find below ECC's responses to points b) and c). ECC provided POTLL with this clarification on the 16<sup>th</sup> March 2018.</p> <p>Please find below ECC's detailed comments on the Traffic Impact Assessment which need to be addressed. Please note the comments below informed ECC's Relevant Representation (RR0018)</p> <p><b>Section 7 Traffic Impact Assessment</b> <b>7.4 ASDA Roundabout</b> Some concerns exist in relation to the operation of the ASDA roundabout, albeit that this is a Trunk Road roundabout, the modelling appears to</p>	<p>HE is content with the scope of the TA but is awaiting information to address outstanding queries with the applicant regarding the trip generation of the proposed development.</p> <p>HE shares ECC's concerns relating to the operation at</p>

indicate that the approach from the docks may experience congestion which may have a knock on effect on the local road network from Tilbury and ASDA. ECC acknowledges that mitigation for this junction is being developed.

**7.6 A1089/A13 Interchange (page 121)**

The assessment of the merge and diverge movements at the A1089 / A13 junction is considered adequate and it shows that movement will operate satisfactorily. We are however concerned that the impact on A13 link capacity is not considered and neither is detail of the impact at M25 Junction 30.

**7.7 A13 / M25 Junction 30 (page 116 of TA) and 6.11.10 Operational (HGV)**

Routing of commercial traffic is generally based on existing port traffic distribution, it is felt that this could be further refined based upon the specific proposed port operations, Ro-Ro traffic will largely travel to/from junction 30, whereas CMAT traffic may be serving more local clients and a larger proportion may turn towards Essex. The use of the trip

ASDA roundabout. HE is in discussions with the applicant regarding the Trip Generation that will have a direct bearing on the projected future volumes of traffic. Subject to our concerns being satisfactorily addressed, HE will reach an informed view of the impact on the operation of the Asda Roundabout and the level of mitigation which is required. However, based upon the predicted traffic flows set out in the Transport Assessment, the currently proposed level of mitigation is unacceptable to HE in respect of capacity, safety and the level of provision for non-motorised users.

HE consider that the merge and diverge layouts have been identified correctly in the TA and provide adequate capacity for existing traffic flows. However, due to the concerns regarding the Trip Generation from PoT2 HE are unable to determine whether the existing layouts including the A13 links have sufficient capacity for the predicted future flows.

HE notes that during the TA scoping stage it was agreed that the distribution of the port traffic could be based on the

characteristic of the existing port and of journey to work data for employees, is a most appropriate approach.

**Impact of Lower Thames Crossing.**

It is noted that ECC is concerned that the impact of the proposed Lower Thames Crossing has not been covered in the transport assessment and it is not planned to do so. While the concern is understood, it needs to be considered that the Environmental Assessment and Transport Assessment for the Lower Thames Crossing is in Scoping Stage and that it may not be possible to incorporate its impact on the current Tilbury2 Transport Assessment. It falls to Lower Thames Crossing proposals to take account of Tilbury 2 as an existing development.

However, based on all indications the presence of the Lower Thames Crossing would ease rather than worsen the impact on those roads that affect ECC and the county's residents and businesses. The Lower Thames Crossing may well add vitality to the Tilbury2 development, Thurrock and Southend, with positive transport impacts and little negative impacts.

**Section 10 Summary & Conclusion**

**Construction Traffic – 10.1.42 to 10.1.44 (page 138)**

Construction traffic presents no specific concerns, its access routes will be controlled and the trip generation of the completed facility far exceeds the construction traffic volumes.

existing surveyed turning proportions on the SRN as no new uses are being introduced at Pot2.

HE is currently revising the traffic model for the LTC, and is incorporating the latest proposals for the design of LTC. If the Applicant used the current assumptions for LTC in a cumulative assessment of the Proposed Development with LTC, that assessment may be unrealistic. Furthermore providing further detailed information on the traffic model and on the route of LTC prior to a formal consultation would compromise the integrity of the planned consultation. HE accepts responsibility for assessing the cumulative traffic impacts from the Proposed Development and LTC that will be presented in HE's application for LTC.

Construction traffic in itself presents no specific concerns provided that it can be controlled by the Applicant in accordance with the CEMP. However when highway mitigation works are agreed the Applicant will need to demonstrate that construction of the Proposed Development

			<p>and the mitigation works will not have an unacceptable impact on the safe and efficient operation of the Strategic Road Network. This should take into account the temporary road closures and reduction in capacity that will in HE's view inevitably occur on the SRN as a result of construction of proposed mitigation at Asda roundabout and elsewhere. Requirements may need to be put in place in respect of the timing and method of construction of mitigation works.</p>
c)	<p>Would ECC, TC and HE state whether they are content with the Framework Travel Plan and Sustainable Distribution Plan as currently drafted?</p>	<p>ECC can provide the following specific comments in relation to the Framework Travel Plan, which have been supplied to the Applicant to assist in addressing ECC's request for clarification (as set out in 1.18.3 c) above.</p> <p>ECC has also reviewed the Sustainable Distribution Plan and has outlined our comments below:</p> <p><b>FRAMEWORK TRAVEL PLAN DOCUMENT REF: 6.2 13.B (ES APPENDIX 13.B)</b></p> <p><b>ECC General Comments:</b></p> <p>ECC, Southend Borough Council and Thurrock Borough Council are currently working on a 3 year DfT funded Access Fund project to enable residents to access employment and training opportunities via Active Travel. The South Essex Active Travel (SEAT) project is due to complete on 31st March 2020. Within the project there are opportunities for businesses to get involved with cycle training, personal travel planning for employees and walking/cycling initiatives. There may be some legacy projects following on from the conclusion of SEAT that Tilbury Port Terminal could access.</p>	<p>HE has provided a response to this point in our submission to the FWQs. Our response advised that HE is in discussion with the Applicant about amendments to both the Framework Travel Plan and the Sustainable Distribution Plan.</p> <p>The Framework Travel Plan is under discussion with the Applicant. HE has requested a number of amendments that includes the provision of a minibus link between the port, Tilbury Town train station, Ferry dock and population centres like Tilbury, Grays and Basildon by the applicant. This has been requested due to the remote location of PoT2 and that the</p>

**2.2: Staff Employed at the Site:**

Clarification is required on

- The numbers of staff per shift for both the port staff and the CMAT staff?
- Whether there will be double the number of staff on site at the start/end of each shift as the shifts change over?

**3.4: Public Transportation:**

**3.4.1: Bus:**

Clarification is required on how the proposed measures to promote public transport will enable the CMAT and main workforce at Tilbury 2 to effectively use the public transport to travel to and from work? ECC would have anticipated the Travel Framework Plan to have explored the extent of the existing service, the 99 bus service, which operates between 05:40-19:05, and the proposed shift patterns of both the CMAT and specifically the main workforce of 100 staff, which is split across 3 shift patterns of 0600-1400; 1400-2200; and 2200-0600 hours.

At present the only proposed measures to promote public transport is a new bus stop, however there is no consideration or mitigation proposed on how the main workforce would be able to effectively use the public transport (both ways), given that their shift patterns do not coincide with the existing operating hours of the bus service.

ECC would have anticipated PoTLL to seek to enhance the operating hours of the bus service, which could be explored in liaison with DP World London Gateway, as they are relatively nearby and will have similar shift patterns with staff travelling from similar locations.

**6.2.5: Pedestrian and Cycle Infrastructure:**

ECC seeks clarification on the additional staff facilities to be provided and recommend the provision of lockers for staff to store walking/cycling gear and a drying room for people to dry wet weather clothes.

**7.1 Marketing and Promotion:**

ECC seeks further consideration and clarification on the approach to promoting sustainable travel modes by PoTLL with the new workforce, to encourage a modal travel shift. Examples and opportunities in the area include the support provided by the SEAT team, with Amazon to deliver

majority of footways in the area, where present, are unlit which raises safety concerns.

The majority of the points that ECC have raised on the FTP are common with the points that HE has raised.

The Sustainable Distribution Plan is under discussion with the Applicant and HE has requested that a number of amendments be made.

In addition, HE would like to review the updated SDP and FTP when they become available.



		<p>Personal Travel Plans via Liftshare’s My PTP to all new recruits as part of their employment checks at their Tilbury site.</p> <p><b>SUSTAINABLE DISTRIBUTION PLAN</b>  ECC welcomes the preparation of the sustainable Distribution Plan and the proposals to form a Sustainable Travel Group to work with tenants to implement the final version of the Framework Travel Plan. Please see ECC’s comments above regarding outstanding clarification and revisions required to the Framework Travel Plan.</p> <p>Please also refer to ECC’s comments regarding the socio economic benefits set out in response to FWQ 1.17.2.</p>	
	d)	Would the Applicant state whether it intends to update the Framework Travel Plan and Sustainable Distribution Plan during the Examination?	
1.18.7		KCC states [RR-021] that it supports modal shift from road to sea and rail, notes that the application proposes 2 or 3 train movements per day, and asserts that the application must ensure capacity of available train paths through London:	
	a)	Would the Applicant state how it is proposing to ensure capacity of available train paths through London, whilst not adversely affect passenger rail services?	
	b)	In response to KCC’s call for consideration of lorry parking to be provided as part of the Proposed Development, due to the significant HGV movements associated with the application, what is the Applicant’s position on this matter?	
1.18.8		With reference to resident Mr Colin Elliott’s relevant representation [RR-001], in which he asserts that “the existing road that goes around the Ferry fields could be upgraded rather than putting a new road near to residential area”:	

	a)	What is the Applicant's response to this assertion by Mr Elliott?		
1.18.9		With reference to PRE's relevant representation [RR-028], in which PRE states that its priority is to ensure the continued efficient and effective operation of its terminals:		
	a)	What assurance can the Applicant give to PRE and its related group companies with regard to the continued functioning of the M25 (notably J30) and the A13 during both construction and operations?		
	b)	How does the Applicant intend to take account of the existing planning permissions with Thurrock Council for development at Purfleet Thames Terminal (PTT) with regard to transport impacts?		
	c)	How will the Applicant ensure the continued access to, and use of, the River Thames by vessels serving PTT and Dartford International Ferry Terminal (DIFT)?		
	d)	Would PRE highlight any mitigation measures that it wishes to propose?		
1.18.10		With reference to TC's relevant representation [RR-031], TC states that it disagrees with some of the assumptions and opinions within the submitted Transport Assessment [APP-072], in particular in relation to the local road network:		
	a)	Would TC specify the matters on which it disagrees with the Applicant?		
	b)	Would TC specify its outstanding issues regarding impact on the Asda roundabout junction and associated mitigation		

		proposals, and state what other mitigation measures it would propose?		
	c)	Would the Applicant state how the Proposed Development has addressed vehicle movement on the local roads network?		
	d)	Would the Applicant state how it has addressed the needs of non-motorised users (local walking and cycle network, including public rights of way)?		
1.18.11		With reference to the relevant representation of London Gateway Port Limited (LGPL) [RR- 022], LGPL asserts that the assessment carried out in support of the Tilbury 2 proposals does not appear to have considered available capacity on the regional/national rail network to accommodate the predicted rail movements:		
	a)	What is the Applicant's response to this assertion from LGPL?		
1.18.12		The ES [APP-031] makes numerous references to an Active Travel Study for improvements to pedestrian and cyclist connectivity in the area which is stated to be secured through the draft DCO and a s106 agreement with the council. There appears to be no reference to an Active Travel Study within the draft DCO, although it is appended to a draft Heads of Terms for the s106 in Doc Ref 6.3:		
	a)	Would the Applicant state how the dDCO will secure the Active Travel Study?		
1.18.13		ES [APP-031] Table 4.1 identifies existing buildings on the site which would be demolished as part of the Proposed Development. It states that material would be crushed and potentially reused		

		on site. Without guarantee of the material being retained on site, the ExA will need to be satisfied that a worst case assessment of traffic impacts has been undertaken:		
	a)	Would the Applicant confirm whether the traffic movements associated with potentially moving this material off site have been taken into account?		
	b)	If not, would the Applicant comment on, and justify, whether these movements would have any bearing on the assessment presented within the ES?		
1.18.14		ES [APP-031] paragraphs 2.57-2.63 explain that the Lower Thames Crossing (LTC) will not be assessed for cumulative effects because of the limited information available. However, it should be noted that the scoping report for LTC was received by PINS on 2 November 2017 and there is a clear overlap of the application site boundaries along the infrastructure corridor. The Applicant was advised to update its assessment in post acceptance section 51 advice:		
	a)	Would the Applicant state its current position with regard to the cumulative effects of the Proposed Development and the LTC?		