

Principal Areas of Disagreement Summary Statement

Lower Thames Crossing (LTC) – TR010032

Transport for London (TfL)

Number	Principal Issue in Question	Statement of Common Ground (SoCG) reference	The brief concern held by TfL which will be reported on in full in Written Representation	What needs to change, or be included, or amended so as to overcome the disagreement	Likelihood of the concern being addressed during Examination
Most Significant					
1	Wider network impacts on local and strategic roads	2.1.27	<p>Multiple locations of concern in relation to changes in travel patterns and network impacts from opening the LTC, including:</p> <ul style="list-style-type: none"> • Gallows Corner • A127 west of M25 J29 • Various junctions along A127 and A12 • A13 west of M25 J30 	Detailed, micro-simulation modelling of the impacts at these locations and an understanding of operational complexities and possible mitigation is requested. Outputs of this modelling need to be reviewed to determine whether TfL is satisfied with the findings and impacts.	Low – TfL has concerns about junction modelling undertaken (e.g. level of detail provided, method used, lack of model validation) and further work is needed to resolve this.
2	Mitigation of wider network impacts	2.1.28	<p>Monitoring may demonstrate that mitigation measures such as capacity upgrades or junction improvements are needed on the surrounding road network in London to address traffic impacts that were not forecast.</p> <p>Shortcomings of the modelling within London done to date</p>	Commitment is requested from the Applicant in the DCO to an approach to using the monitoring to identify and work with other highway authorities to secure funding for mitigation measures should impacts different to the modelling be identified and should these	Low – matter not agreed. TfL disputes that the Applicant is meeting its obligation to balance national and local needs as it is failing to commit to any approach to securing mitigation on the local road network.

			<p>mean local impacts of the Project are difficult to glean and the model is lacking granularity at the local level.</p> <p>Timing and period of monitoring is insufficient – should be longer and prior to commencement of construction on the Project.</p>	<p>measures be demonstrated to be necessary.</p> <p>Consideration of a range of options for reducing highway traffic flows in London, should this be necessary, is requested in the Wider Network Impacts Management and Monitoring Plan (WNIMMP). TfL suggests that the Applicant reviews the proposed charging regime against alternatives that are more flexible and provides further detail about why the same regime as the Dartford Crossing is appropriate.</p> <p>The traffic impact monitoring scheme should begin earlier than proposed and run more frequently than annually, to better inform highway authorities on the impacts of the Project.</p>	
3	Operational air quality (AQ) monitoring	2.1.17	Air quality should be monitored where significant traffic increases are predicted through the project (e.g. A127 west of M25 Junction 29).	The DCO should include commitment to air quality management and monitoring for sections of road with significant traffic increases forecast. The WNIMMP should also be amended accordingly.	Low – matter not agreed. Fundamental difference in proposed approach.

4	Impact of the Project on existing and future TfL assets	2.1.8	Works to the Transport for London Road Network (TLRN) should be constructed to the satisfaction of, and maintained by, the local highway authority.	The DCO should include protective provisions in this regard, or equivalent alternative assurance provided. TfL needs to understand the extent of new works or assets which it will be required to manage and maintain, and will require a commuted sum from the Applicant for this purpose.	Medium – could be resolved prior to the DCO examination subject to protections being satisfactory to TfL.
5	Costs and commuted sum for adoption	2.1.11	TfL is seeking to recover costs associated with delivery of the Project, together with a commuted sum to cover increased management and maintenance costs from new and modified assets.	Awaiting a decision by the Applicant on whether they would agree to a commuted sum to cover costs.	Medium – could be resolved prior to the DCO examination subject to arrangements being satisfactory to TfL.
Significant					
6	Consultation in the capacity of highway authority	2.1.2	TfL needs to be consulted on matters relevant to its functions for those sections of highway where it is the highway authority.	DCO requirements need to be amended so that TfL is a consultee for detailed design, landscaping, ecology, and surface water drainage matters regarding TfL's sections of highway directly affected by the scheme. For example, the draft DCO still only refers to the local planning authority, not the highway authority, in Schedule 2 - Requirement 12 regarding fencing.	Medium – this matter continues to be discussed with the Applicant.

				If TfL is not a consultee on these matters, adequate explanation should be provided about why this is not appropriate and how TfL can influence the design of infrastructure delivered by the Project that TfL will become responsible for.	
7	Future Ultra Low Emission Zone (ULEZ) expansion and road charging	2.1.19	Project modelling should have regard to the London-wide ULEZ expansion, planned for implementation in August 2023, and consider how it might affect the impact of the LTC on traffic patterns through modelling sensitivity tests. An assessment should also be made on how the environmental impacts of the Project may differ if road user charging is introduced in London.	Include sensitivity testing and assessment of impacts as described, for the London-wide ULEZ expansion and road user charging.	Low – matter not agreed. Disagreement on scale of impact of these charging proposals.
8	Public transport	2.1.22	TfL requests the Applicant to consider targeted interventions to improve bus performance and reliability as part of the Project.	Consideration of interventions in collaboration with TfL is requested.	Low – matter not agreed. The Applicant currently has no plans to provide interventions.
9	Erosion of benefits over time	2.1.25	Benefits of traffic alleviation from the LTC may be reduced if growth is greater than forecast by modelling, and/or if vehicle volume is not controlled.	The Transport Assessment and WNIMMP should elaborate on this with more detailed sensitivity testing for alternative growth scenarios, and a more	Low – the Applicant is of the position that their model is adequate and is unlikely to change its position or complete additional tests.

				robust approach to monitoring and mitigation.	
10	New assets outside the highway boundary	2.1.9	TfL requires a clear understanding of the split of responsibilities with the Applicant for these assets.	TfL requires commitment that it will be involved in the design of any new assets which it is expected to take responsibility for.	Medium – could be resolved prior to the DCO examination subject to arrangements being satisfactory to TfL.
11	Permanent vs. temporary acquisition of land owned by TfL	2.1.7	Minimise permanent acquisitions where not required by the scheme, especially around J29 of the M25 and relating to the A127.	Discussions on the final ownership and potential return of acquired land are required. Draft DCO needs to be amended to ensure the Applicant has the necessary powers for the transfer of land and rights to TfL to operate and maintain the walking, cycling and horse riding (WCH) bridge over the A127.	High – acquisitions within the TLRN boundary should be discussed and resolved with the Applicant prior to the DCO examination.
12	Walking cycling and horse riding (WCH) crossing	2.1.23	Quality and attractiveness of the pedestrian and cycle route across M25 Junction 29. This is largely addressed by the inclusion of the new WCH crossing to the west of the junction; however, TfL needs to see more details related to the design of this bridge to address concerns about the safety of users.	Details of the bridge to be provided to TfL prior to detailed design stage to assess the design, construction, and maintenance implications of what is proposed. Continued dialogue should occur during the detailed design stage to ensure it can be efficiently maintained and safe.	High – could be resolved prior to the examination pending further discussion.

13	Particulate matter (PM _{2.5} & PM ₁₀)	N/A	The assessment of PM _{2.5} particles has been calculated as a proportion of modelled PM ₁₀ and not as a separate pollutant.	The robustness of this approach needs to be considered.	Low – further modelling by the Applicant is not proposed.
14	Nitrogen dioxide (NO ₂)	N/A	Modelled NO ₂ levels are well above World Health Organisation (WHO) guidelines, which Mayoral policy is seeking to move towards.	Consider mitigation or how Project can meet WHO guidance.	Low – while levels are higher than aspirational guidance, they meet UK legal limit and Air Quality Strategy (AQS) objective.
15	Local Policy considerations	2.1.4	<p>Project should not conflict with the Mayor's Transport Strategy (MTS) and/or adopted 2021 London Plan.</p> <p>The London Plan and the Mayor's Transport Strategy are important and relevant matters for the purposes of section 104 of the Planning Act 2008.</p>	Need to address potential policy conflicts in the Planning Statement, specifically regarding: assessment and mitigation of traffic impacts, and several environmental topics.	Medium – Planning Statement sets out the Applicant's views of compliance with London policy but TfL considers there to be some issues that remain.
16	Operational carbon emissions	2.1.30	TfL aims to achieve net zero carbon by 2030 and the Project should play its part in achieving this goal (alongside the Government's Transport Decarbonisation Plan). To this end, action to address, manage, and mitigate user carbon (road user emissions) should be included in the Project.	The Carbon and Energy Management Plan should be further aligned with net zero by investigating user carbon emissions mitigation and reductions from the opening year, rather than stating that the Applicant cannot control user carbon therefore scoping out any efforts to mitigate the impacts.	Medium – pending further information from the Applicant on the Project's consistency with carbon policy and additional mitigation efforts.

Less Significant					
17	Utility works rights and management	2.1.10	TfL needs to review and approve utility diversions or works affecting the TLRN, including any future arrangements for management and maintenance.	TfL is to be consulted prior to commencement of utility works interfacing with TLRN.	High – TfL is satisfied that works affecting the TLRN are adequately set out and TfL's role in traffic management is clear, but the Applicant does not address TfL's involvement in the design of utility diversions and future arrangements.
18	Construction vehicle safety	2.1.12	Construction vehicle safety standards need to support TfL's Vision Zero goal.	A description of how the Applicant will comply with the Mayor's Vision Zero action plan is needed. The Code of Construction Practice should be amended to include further information on this.	High – could be resolved prior to the DCO examination subject to approach being satisfactory to TfL.
19	Operational traffic management	2.1.15	Measures to ensure the resilience of the highway network in the event of an accident, to ensure traffic on the network is satisfactorily managed in the event of planned or unplanned disruption.	Clarification of the strategic diversion plans to be in place for the Project, Dartford Crossing and the neighbouring Strategic Road Network (SRN). Implementation of established processes between the Applicant and affected highway authorities to provide network resilience.	High – could be resolved prior to the DCO examination subject to explanation of approach from the Applicant being satisfactory to TfL.
20	Replacement planting	2.1.20	Concern over removal of trees and details related to	Replacement woodland planting must be outlined in further detail	High – could be resolved prior to the

			<p>replacement planting, particularly along the A127. The Project is not providing a net gain in biodiversity as required by the MTS.</p>	<p>in documents such as the Arboricultural Assessment, providing information on how the Project would ensure adequate replacement based on the value of the trees removed, and where possible, a net gain of biodiversity on TfL land/the TLRN.</p> <p>Proximity of trees to diverted utilities should be reviewed, with assurances provided that maintenance of utilities infrastructure will not require later removal of trees.</p>	<p>examination pending further discussion.</p>
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