Lower Thames Crossing

7.2 Planning Statement Appendix C Local Authority Policy Review

APFP Regulation 5(2)(q)

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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Lower Thames Crossing

7.2 Planning Statement Appendix C Local Authority Policy Review

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Appendix C Local Authority Policy Review

C.1 Introduction

C.1.1 This Appendix comprises a table of the relevant adopted and emerging Local Plan policies considered by National Highways to be relevant to the Project, with a summary assessment of the Project's alignment and conformity with the policy as demonstrated by assessments in the Environmental Statement (ES) (Application Document 6.1) and other relevant documents. Policies from the Local, Transport and Mineral Plans of the 'host' local authorities are referred to following the alignment of the Project from south to north.

C.1.2 In compliance with section 104(2)(d) of the 2008 Act, each table only identifies those policies in the listed documents that are considered by National Highways to be "both important and relevant" to the Secretary of State's consideration of the DCO Application. Where certain policy criteria within a policy are not considered to be of relevance to the Project, the policy wording has been shortened to include only those aspects of relevance, prefaced with the wording 'Shortened Policy'.

C.1.3 In Maidstone and Tonbridge and Malling, the policy analysis is limited to landscape, cultural heritage, biodiversity and policy relating to the Kent Area of Outstanding Natural Beauty (AONB) as those areas of the Project site are for nitrogen deposition compensatory planting only.

C.1.4 The Plans included are included in Table C.1.

Table C.1 Local Planning Policy documents

Table Number	Plan	Status
C.1	Maidstone Borough Local Plan 2011 – 20	Adopted Oct 2017
C.2	Maidstone Borough Local Plan Review	Reg 19 Consultation Oct – Dec 2021
C.3	Tonbridge and Malling Core Strategy	Adopted Sept 2007
C.4	Tonbridge and Malling Local Plan	Local Plan abandoned post-examination in 2021. Regulation 18 Consultation issued 22nd September 2022
C.5	Gravesham Local Plan Core Strategy	Adopted Sept 2014
C.6	Gravesham Local Plan Regulation 18 Stage 2 Consultation: Draft Development Management Policies Document	Reg. 18 consultation: October to December 2020

Table Number	Plan	Status
C.7	Gravesham Local Plan Regulation 18 Stage 2 Consultation: Draft Local Plan Review & Site Allocations Document	Reg. 18 consultation: October to December 2020
C.8	Kent Minerals and Waste Local Plan 2013-2030	Adopted 2020
C.9	Kent Local Transport Plan 4: 2016-2031	Adopted June 2017
C.10	Thurrock Core Strategy and Policies for the Management of Development	Adopted Jan 2015
C.11	Thurrock Local Plan – Issues and Options (Stages 1 & 2)	Stage 1 Feb 2016 Stage 2 Dec 2018 LDS anticipated 2022
C.12	Brentwood Local Plan 2016-2033	Adopted 23rd March 2022
C.13	Essex Minerals Local Plan	Adopted July 2014. Consultation on proposed amendments ended April 2021. Non-Statutory engagement on Policy S6 & notification of call for sites for sand & gravel extraction Feb-March 2022.
C.14	Essex and Southend-on-sea Waste Local Plan	Adopted July 2017
C.15	Essex Transport Strategy: The Local Transport Plan for Essex	Published June 2011
C.16	Havering Local Plan 2016-31	Adopted Nov 2021
C.17	The London Plan	Adopted March 2021
C.18	The Joint Waste Development Plan for East London Waste Authority Boroughs	Adopted Feb 2012
C.19	Mayor's Transport Strategy	Adopted March 2018

C.2 Policy tables

Table C.2 Maidstone Borough Local Plan 2011-2031 (Adopted 2017)

Policy	Policy guidance	Policy assessment
SS1: Maidstone Borough Spatial Strategy Shortened Policy	9. In other locations, protection will be given to the rural character of the borough avoiding coalescence between settlements, including Maidstone and surrounding villages, and Maidstone and the Medway Gap/Medway Towns conurbation. 10. The green and blue network of multi-functional open spaces, rivers and water courses, the Kent Downs Area of Outstanding Natural Beauty and its setting, the setting of the High Weald Area of Outstanding Natural Beauty, and landscapes of local value will be conserved and enhanced. 11. Infrastructure schemes that provide for the needs arising from development will be supported.	The relevance of the Maidstone Local Plan to the Project is solely in respect of a proposed nitrogen deposition compensation site at Blue Bell Hill, north of Frith Wood / Westfield Wood, south of the M2, east of the A229 which straddles the Maidstone Borough / Tonbridge & Malling Borough Council areas. The purpose of the site is to create new areas of habitat as compensation for the residual nitrogen deposition effects of the Project. It comprises areas of new planting and does not constitute physical built development. The compensation proposals have been developed in association with Natural England. Accordingly, they should be considered as a beneficial impact of the Project and so be in accordance with local policy. The Blue Bell Hill site is 72.2ha in area. It lies within countryside and the North Kent Downs Area of Outstanding Natural Beauty (AoNB). It is adjacent to two areas of ancient woodland (Malling Wood and Westfield Wood). The latter also forms part of the North Downs Special Area for Conservation (SAC), the Wouldham to Detling Escarpment Site of Special Scientific Interest (SSSI) and the Boxley Warren Local Nature Reserve (LNR). The proximity to existing woodland provides an opportunity to enhance ecological links and create mosaic habitats so providing wider ecological and biodiversity benefits for habitats and landscape along the M2/A2 corridor. Chapter 7 of the ES, Landscape and Visual (Application Document 6.1) provides an assessment of the Project's landscape and visual impacts on the nationally designated Kent Downs AoNB and other national and local landscape character areas both during construction and post completion. Appendix

Policy	Policy guidance	Policy assessment
		F to this Planning Statement provides an assessment of the planning issues raised by the location of the Project within the Kent Downs AoNB. Chapter 7 Landscape and Visual (of the ES) concludes that, in spite of the Project design which has sought to avoid landscape and visual effects or reduce residual effects through the embedded mitigation measures shown on Figure 2.4: Environmental Masterplan (Application Document 6.2) there would be large significant adverse effects on certain landscape areas. Mitigation includes, where practicable, replacing vegetation that would be removed to facilitate construction, the provision of green bridges to maintain landscape continuity across the Project route, false cutting earthworks to help screen views and extensive woodland planting at the junctions with the A2, A13 and M25 to help integrate the Project into the landscape, along with woodland, tree belts and hedgerow planting along the rest of the Project route. Nonetheless, the landscape character of the West Kent Downs (sub area Shorne) Local Landscape Character Area (LLCA) within the West Kent Downs Landscape Character Area (LCA) in the AONB, and the Thong and Chalk LLCA sub areas of Higham Arable Farmland, south of the River Thames. Within the AONB there would be very large and large significant adverse effects on views from park pale overbridge, Brewers Road overbridge and at end of Thong Lane overbridge near the Inn on the Lake Hotel and bridge over the High Speed 1 rail line. Effects on landscape character and views would generally reduce by year 15 of operation once mitigation planted has established. However, a significant adverse effect would remain on five LLCAs, with large adverse effects in the landscape character of the Higham Arable Farmland (sub area

Policy	Policy guidance	Policy assessment
		Thong) and moderate adverse effects on the landscape character of the West Kent Downs (sub area Shorne) LLCA within the West Downs LCA. Despite these impacts, it is considered that, as evidenced by the considerations listed below, the overriding need for the project outweighs the residual effects and Appendix F provides evidence of significant 'exceptional circumstances' of relevance to the Project in justifying its development within the AONB. • Application Document 7.1 the Need for the Project • Application Document 7.18 the Benefits and Outcomes Document • Chapter 5 of this Planning Statement (Application Document 7.2) the absence of viable alternative routes • The delivery of an Environmental Management Plan to implement the mitigation measures in the REAC and CoCP (Application Document 6.3) the nature, extent and quality of the mitigation and compensation proposed • The specific policy support for the Project as a major road infrastructure project (Road Investment Strategies 1 and 2)
SP17: The Countryside Shortened Policy	1. Development proposals in the countryside will not be permitted unless they accord with other policies in this plan and they will not result in harm to the character and appearance of the area. 3. Great weight should be given to the conservation and enhancement of the Kent Downs Area of Outstanding Natural Beauty. 4. Proposals should not have a significant adverse impact on the settings of the Kent Downs Area of Outstanding Natural Beauty or the High Weald Area of Outstanding Natural Beauty.	See response to Policy SS1 in Table C.2.

Policy	Policy guidance	Policy assessment
	7. Development in the countryside will retain the separation of individual settlements. Account should be taken of the Kent Downs Area of Outstanding Natural Beauty Management Plan and the Maidstone Borough Landscape Character Guidelines Supplementary Planning Document.	
SP18: Historic Environment	To ensure their continued contribution to the quality of life in Maidstone Borough, the characteristics, distinctiveness, diversity and quality of heritage assets will be protected and, where possible, enhanced. This will be achieved by the council encouraging and supporting measures that secure the sensitive restoration, reuse, enjoyment, conservation and/or enhancement of heritage assets, in particular designated assets identified as being at risk, to include: • Collaboration with developers, landowners, parish councils, groups preparing neighbourhood plans and heritage bodies on specific heritage initiatives including bids for funding • Through the development management process, securing the sensitive management and design of development which impacts on heritage assets and their settings • Through the incorporation of positive heritage policies in neighbourhood plans which are based on analysis of locally important and distinctive heritage • Ensuring relevant heritage considerations are a key aspect of site master plans prepared in support of development allocations and broad locations identified in the local plan	The provision of mosaic habitat planting on sites within Maidstone to compensate for the effects of nitrogen deposition would not be contrary to the requirements of this policy.

Table C.3 Maidstone Borough Regulation 19 Draft Plan for Submission (October 2021)

Policy	Policy guidance	Policy assessment
LPRSS1: Maidstone Borough Spatial Strategy Shortened Policy	13. In other locations, protection will be given to the rural character of the borough avoiding coalescence between settlements, including Maidstone and surrounding villages, and Maidstone and the Medway Gap/Medway Towns conurbation. 14. The green and blue network of multi-functional open spaces, rivers and water courses, the Kent Downs Area of Outstanding Natural Beauty and its setting, the setting of the High Weald Area of Outstanding Natural Beauty, and landscapes of local value will be conserved and enhanced.	See response to Policy SS1 in Table C.2.
LPRSP9: Development in the Countryside Shortened Policy	1) Development proposals in the countryside will not be permitted unless they accord with other policies in this plan and they will not result in harm to the rural character and appearance of the area. 3) Great weight should be given to the conservation and enhancement of the Kent Downs Area of Outstanding Natural Beauty. 4) Proposals should not have a significant adverse impact on the settings of the Kent Downs Area of Outstanding Natural Beauty or the High Weald Area of Outstanding Natural Beauty. 7) Development in the countryside will retain the separation of individual settlements. Account should be taken of the Kent Downs Area of Outstanding Natural Beauty Management Plan and the Maidstone Borough Landscape Character Guidelines Supplementary Planning Document	See response to Policy SS1 in Table C.2.

Policy	Policy guidance	Policy assessment
LPRSP14A: Natural Environment Shortened Policy	1. To enable Maidstone Borough to retain a high quality of living, protect and enhance the environment, and to be able to respond to the effects of climate change, developers will ensure that new development incorporates measures where appropriate to: • Deliver a minimum 20% on site Biodiversity Net Gain on new residential development, having regard to Biodiversity Opportunity Areas and/or Nature Recovery Networks. Biodiversity Net Gain should be calculated in accordance with the latest Natural England biodiversity metric or equivalent. • Protect positive landscape character, areas of Ancient Woodland, veteran trees, trees with significant amenity value, important hedgerows, features of biological or geological interest, and the existing public rights of way network from inappropriate development and avoid significant adverse impacts as a result of development. • Avoid damage to and inappropriate development considered likely to have significant direct or indirect adverse effects on: - Internationally, nationally and locally designated sites of importance for biodiversity (either within or beyond the borough) - Local Biodiversity Action Plan priority habitats 2. If significant harm to habitats and biodiversity cannot be avoided, then the mitigation hierarchy should be followed. 3. Enhance, extend and connect habitats to enhance the borough's network of sites that incorporates designated sites of importance for biodiversity, priority habitats and fragmented Ancient Woodland; support opportunities for the creation of new Biodiversity Action Plan priority	The relevance of the Maidstone Local Plan to the Project is solely in respect of a proposed nitrogen deposition compensation site at Blue Bell Hill, north of Frith Wood / Westfield Wood south of the M2, east of the A229 which straddles the Maidstone Borough / Tonbridge & Malling Borough Council areas. The purpose of the site is to create new areas of habitat as compensation for the effects of nitrogen deposition from vehicles using the Project. It comprises areas of new planting and does not constitute physical built development. The nitrogen deposition compensation proposals have been developed in association with Natural England. Accordingly, they should be considered as a beneficial impact of the Project and so be in accordance with local policy. The Blue Bell Hill site is 72.2ha in area. It lies within countryside and the North Kent Downs AoNB. It is adjacent to two areas of ancient woodland (Malling Wood and Westfield Wood). The latter also forms part of the North Downs SAC, the Wouldham to Detling Escarpment SSSI and the Boxley Warren LNR. This proximity to existing woodland provides an opportunity to enhance ecological links and create mosaic habitats so providing wider ecological and biodiversity benefits for habitats and landscape along the M2/A2 corridor. Accordingly, it is considered to be fully in accordance with this policy.

Policy	Policy guidance	Policy assessment
	habitats; create, enhance, restore and connect other habitats, including links to habitats outside Maidstone Borough, where opportunities arise • Provide for the long-term maintenance and management of all natural assets, including landscape character, associated with the development • Mitigate for and adapt to the effects of climate change • Positively contribute to the improvement of accessibility of natural green space within walking distance of housing, employment, health and education facilities and to the creation of a wider network of new links between green and blue spaces including links to the Public Rights of Way network. 6. Development proposals will give weight to the protection of the following designated sites for biodiversity, as shown on the policies map, which will be equal to the significance of their biodiversity/geological status, their contribution to wider ecological networks and the protection/recovery of priority species as follows: • For internationally designated sites (SACs, SPAs, and Ramsar sites; including candidate sites), the highest level of protection will apply, as afforded by the Habitats Regulations 2017 (as amended). • Other than in exceptional circumstances (as set out in the Regulations), development will only be permitted where the Council is satisfied that any necessary mitigation, management or monitoring measures are secured in perpetuity as part of the proposal and will be implemented in a timely manner, such that, in combination with other plans and development	

Policy	Policy guidance	Policy assessment
	proposals, there will not be adverse effects on the integrity of a European site. • For nationally designated sites (including candidate sites), development will only be permitted where it is not likely to have an adverse effect on the designated site or its interests (either individually or in combination with other developments) unless the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the designated site that make it of national importance and any broader impacts on the national network of Sites of Special Scientific Interest. Where damage to a nationally designated site cannot be avoided or mitigated, compensatory measures will be sought. Development will also accord with and support the conservation objectives of any biodiversity site management plans. • For locally designated sites (including draft published sites), development likely to have an adverse effect will be permitted only where the damage can be avoided or adequately mitigated or when its need outweighs the biodiversity interest of the site. Compensation will be sought for loss or damage to locally designated sites.	
LPRSP14(B)	To ensure their continued contribution to the economy, culture and image of Maidstone Borough, the characteristics, distinctiveness, diversity and quality of heritage assets will be conserved and, where possible, enhanced. This will be achieved by the council encouraging and supporting measures that secure the sensitive restoration, reuse, enjoyment, conservation	The provision of mosaic habitat planting on sites within Maidstone to compensate for the effects of nitrogen deposition would not be contrary to the requirements of this policy.

Policy	Policy guidance	Policy assessment
	and/or enhancement of heritage assets, in particular designated assets identified as being at risk, to include: 1. Collaboration with developers, landowners, parish councils, groups preparing neighbourhood plans and heritage bodies on specific heritage initiatives including proposals for conservation and appropriate re-use of historic assets (especially as drivers for local regeneration) and bids for funding 2. Through the development management process, securing the sensitive management and design of development which impacts on heritage assets and their settings and positively incorporates heritage assets into wider development proposals. 3. Through the incorporation of positive heritage policies in neighbourhood plans which are based on analysis of locally important and distinctive heritage; and broad locations identified in the local plan. 4. Ensuring relevant heritage considerations are a key aspect of site master plans prepared in support of development allocations and broad locations identified in the Local Plan and that specialist officers will be consulted at an early stage in the preparation of plans 5. Through the reallocation of Non-Designated Heritage Assets to the Local List 6. Through the review and reduction of assets recorded in the list of Heritage Assets at Risk held by Historic England 7. Through reference to the Heritage Asset Assessment and Heritage Assessment of Proposed Housing Allocations matrix in all individual site policies 8. Through the protection, conservation and enhancement of the historic environment and archaeological landscapes appropriate to their significance.	

Table C.4 Tonbridge and Malling Core Strategy (September 2007)

Policy	Policy guidance	Policy assessment
Policy CP5: Strategic Gap	Unless justified by special circumstances, development will not be proposed in the LDF or otherwise permitted that would harm the function of the mid-Kent Strategic Gap as a physical break maintaining the separation and separate identities of the built-up areas of Maidstone, Medway Towns and the Medway Gap.	See response to Policy SS.1 in Table C.2 above which also applies to Tonbridge & Malling Borough. The part of the nitrogen deposition compensation site at Blue Bell Hill and Burnham, that is within Tonbridge & Malling Borough is shown as within the countryside and the North Kent Downs AoNB. It is also adjacent to two areas forming part of the Wouldham to Detling Escarpment SSSI and Frith Wood.
Policy CP6: Separate Identity of Settlements	1. Development will not be proposed in the LDF or otherwise permitted within the countryside or on the edge of a settlement where it might unduly erode the separate identity of settlements or harm the setting or character of a settlement when viewed from the countryside or from adjoining settlements. 2. Any development that is considered acceptable in terms of this policy should maintain or enhance the setting and identity of the settlement, and in the countryside, be consistent with Policy CP14.	See response to Policy LPRSP14A SS.1 in Table C.3.
Policy CP7: AONB Shortened Policy	Development will not be proposed in the LDF, or otherwise permitted, which would be detrimental to the natural beauty and quiet enjoyment of the Areas of Outstanding Natural Beauty, including their landscape, wildlife and geological interest.	See response to Policy SS.1 in Table C.2.
Policy CP14**:** Development in the Countryside Shortened Policy	In the countryside development will be restricted to: (h) predominantly open recreation uses together with associated essential built infrastructure (i) any other development for which a rural location is essential.	See response to Policy LPRSP14A in Table C.3.

Policy	Policy guidance	Policy assessment
Policy CP25	1. Development will not be proposed in the LDF or permitted unless the service, transport and community infrastructure necessary to serve it is either available, or will be made available by the time it is needed. All development proposals must therefore either incorporate the infrastructure required as a result of the scheme, or make provision for financial contributions and/or land to secure such infrastructure or service provision at the time it is needed, by means of conditions or a planning obligation. 2. Where development that causes material harm to a natural or historic resource is exceptionally justified, appropriate mitigation measures will be required to minimise or counteract any adverse impacts. Where the implementation of appropriate mitigation is still likely to result in a residual adverse impact then compensatory measures will be required.	Clause 2 of this policy is relevant – however, the proposals for nitrogen deposition compensation would not cause material harm to any historic resource.

Table C.5 Tonbridge and Malling Local Plan Regulation 18 Consultation September 2022

Policy	Policy guidance	Policy assessment
NA	A regulation 18 consultation local plan was issued on 22nd September 22 and is out for public consultation until the 3rd November 2022. As a regulation 18 consultation document it does not contain any draft policies or allocations. Rather, it is an 'issues and options'-type consultation produced to elicit views on the principles that should determine where new homes and infrastructure improvements should be developed across the borough. There is a reference to the Project at paragraph 5.5.16 which states that: "…If approved the delivery of the Lower Thames Crossing project will consume capacity on key routes linking the M20 and M2, requiring mitigation including junction improvements which are not currently funded…" As this regulation 18 consultation plan is at such an early stage in its preparation it can be afforded little, if any, weight in the decision-making process. Accordingly, the 2007 Core Strategy constitutes the adopted development plan for the borough.	Not Applicable

Table C.6 Gravesham Local Plan Core Strategy (adopted September 2014)

Policy	Policy guidance	Policy assessment
Policy CS01: Sustainable Development	Planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise. When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether: • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole • Specific policies in that Framework indicate that development should be restricted.	At the core of the NPPF is a presumption in favour of sustainable development. One 'pillar' of sustainable development is an economic objective (which sits equally alongside social and environmental objectives). The economic objective seeks to help build a strong, responsive and competitive economy, to ensure that the right land is available at the right time to support growth, to foster innovation and improved productivity and by identifying and coordinating the provision of infrastructure. The primary reason for bringing forward the Project is to help achieve this objective viewed in the context of the economy of the local area, the region and the country as a whole. This is consistent with the Government's vision and strategic objectives for the national networks set out in the NPSNN. The Environmental Impact Assessment (EIA) for the Project is reported in the Environmental Statement (ES) (Application Document 6.1) which assesses the likely significant environmental effects of the Project and presents mitigation for the environmental effects arising. Opportunities for environmental and social benefits have been considered and will continue through the detailed design process. The residual significant environmental effects of the Project (following mitigation) are described in the ES. The economic, environmental and social benefits of the Project are summarised in the Need for the Project (Application Document 7.1). The delivery of environmental and social benefits as part of the Project are described more fully in the

Policy	Policy guidance	Policy assessment
		accompanying Green Infrastructure Study (Appendix H to this Planning Statement). This provides a conceptual perspective or 'bigger picture' for the delivery of large-scale Green Infrastructure as part of mitigation for the Project to be embedded in an Environmental Masterplan: Figure 2.4 (Application Document 6.2) of the ES. The Green Infrastructure Study demonstrates how existing and proposed Green Infrastructure can connect with and enhance communities and wildlife at the sub-regional and city-scale. The Green Infrastructure Study focuses on land to be safeguarded, managed or secured in positive ways to create a multifunctional network of green spaces and assets for which investment can deliver the greatest range of benefits in line with the Scheme Objectives. 42.6ha of additional habitats and planting will be created in the area of Shorne Woods as nitrogen deposition compensation which will enhance ecological links and networks and biodiversity and result in positive benefit to the area. Economic benefits of the Project include boosting business productivity, opening up opportunities for local economic growth and employment across the River Thames and facilitating growth exports at the region's ports. The social benefits of the Project include those associated with the introduction of the Project itself, in tackling current and forecast levels of traffic congestion. This in turn will be a catalyst to improved social and economic activity within the region, brought about by the additional connectivity offered by the Lower Thames Crossing that will improve the ability for local traffic to cross the River Thames.

Policy	Policy guidance	Policy assessment
Policy CS02: Scale and Distribution of Development Shortened Policy	4.2.27 In the rural area, development will be supported within those rural settlements inset from the Green Belt as defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan. The extent of the Green Belt is defined on the Policies Map. A strategic Green Belt boundary review will be undertaken to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt.	The Metropolitan Green Belt accounts for approximately 78% of the Borough of Gravesham's total land area. Appendix E of this Planning Statement assesses the planning issues raised by the location of the Project within the Green Belt. Chapter 6 assesses the impacts of the Project (including in Gravesham Borough) against the National Policy Statements and this Chapter articulates the project in relation to local policy. The assessment acknowledges that the Project as a whole constitutes 'inappropriate' development in the Green Belt. In such a situation, the NPSNN requires an applicant to demonstrate that there are very special circumstances which override the general presumption against inappropriate development in the Green Belt. This is demonstrated in Appendix E of this Planning Statement which provides a detailed assessment of the case for the Project to be located in the Green Belt including the very special circumstances which apply. Those very special circumstances include the following considerations: • The defined and overriding need (including national policy need) for the Project is assessed and reported in (Application Document 7.1: Need for the Project) and summarised in section E8 of Appendix E Green Belt (Application Document 7.2) • The absence of suitable, viable alternatives (ES Chapter 3: Assessment of Reasonable Alternatives, Application Document 6.1) and Chapter 5 Project Evolution and Alternatives of the Planning Statement (Application Document 7.2)

Policy	Policy guidance	Policy assessment
		• Local, regional and national economic benefit; (Application Document 7.1: Need for the Project) • The Green Belt policy context (in terms of the purposes of Green Belt, proposed mitigation and benefits) • The temporary or limited nature of many of the impacts. Further details regarding the 'need' case for the Project, as a form of linear infrastructure (paragraph 5.171 of the NPSNN) is provided in The Need for the Project (Application Document 7.1).
Policy CS07: Economy, Employment and Skills Shortened Policy	In addition to promoting the development of employment land, the policy states: 5.1.38 The Council will work with its regeneration partners to enhance opportunities for all local people to access the greater range of higher skilled jobs that will arise as a result of the policies above. Support will be given to upgrading educational and training facilities and major development projects will be expected to contribute (either directly or through other agencies) towards the delivery of skills training, the promotion of apprenticeships and work placements.	The Project is a multi-billion pound construction undertaking which will create substantial local employment opportunity. The Benefits and Outcomes Document (Application Document 7.20) identifies target outcomes which aim delivering local skills, increasing local employment, creating increased awareness in construction, and expanding the local supply chain. Paragraph 3.3.5 of Application Document 7.20 sets the following skills & employment strategy targets: • Apprenticeships – 437 people • Pre-employment programmes – 650 people • Graduates / Trainees – 291 people • Work Placement – 470 people • Training for Local Communities – 350 people • Newly employed - 500 people • Support to educators – 2,000 Hours of support • Education Engagement – 5,000 hours • Sector Skills Qualifications - 500

Policy	Policy guidance	Policy assessment
		These measures will be secured through a Section 106 agreement with the relevant local authorities (Application Document 7.3).
Policy CS10: Physical and Social Infrastructure	Support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure, or lead to the provision of additional infrastructure that improves community well-being. Where there is the threat of loss of existing infrastructure, consideration will be given to viability and whether sufficient alternative provision is available. Where new development leads to the need for new or improved physical or social infrastructure, developers will be required to provide or contribute towards this subject to viability considerations. Such infrastructure will be put in place in a timely manner to support new development. All new development should make the most efficient use of new and existing infrastructure.	The Project is a significant piece of new infrastructure which will result in substantial benefits nationally, regionally and locally. It will provide a direct connection from Gravesham Borough to Essex, north of the River Thames and beyond. It will reduce congestion, improve road safety, increase connectivity and economic opportunity and bring a range of environmental and community benefits (see Application Document 7.1 The Need for the Project). The Project will necessitate the loss of some recreational infrastructure in the borough in the form of the Southern Valley Golf Club. There will also be some impacts on Shorne Woods Country Park and temporary impacts on PRoW and other recreational amenity. However, this is compensated for by way of additional park and recreational provision which more than offsets these losses (see Appendices D and G of the Planning Statement (Application Document 7.2) of this Planning statement dealing with Land use including open space, green infrastructure and Green Belt).
Policy CS11: Transport Shortened Policy	5.5.38 New developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public	The Project will have an overall positive effect for public transport and will impact on the highway network which may see some increase in traffic on local roads both during the construction and operation of the Project. However, this needs to be considered in the wider regional and national transport, connectivity and economic contexts in terms of the need for the Project (Application Document 7.1) and the existing highways congestion which will be relieved at the Dartford Crossing (see Application Document 7.1: Need for the

Policy	Policy guidance	Policy assessment
	transport network requirements and management arising from the development. 5.5.39 Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities. 5.5.40 The Council will support proposals which improve public transport provision and facilities in the Borough. In particular, it will: • seek to maintain and expand, where justified, segregation lanes for Fastrack and existing bus priority measures elsewhere • require Key Sites to include provision for buses • support the development of transport hubs at Gravesend Town Centre and Ebbsfleet (in Dartford Borough Council area) to provide high quality interchange facilities between bus, rail, walking and cycling • Ensure an adequate supply of public car parking. 5.5.41 The Council will seek improvements to walking and cycling facilities and networks in the Borough including provision in new development as appropriate. These should provide improved access to Gravesend Town Centre and Ebbsfleet and to other services and facilities in the Borough. In particular, the Council will seek the provision of pedestrian and cycle links between Northfleet and Ebbsfleet stations and along the River Thames, as part of the proposed Thames Estuary Path. 5.5.42 Land required for the possible future extension of Crossrail and to protect the High Speed 1 (HS1) railway is	Project and Application Document 7.20: Benefits and Outcomes Document). Also, the additional provision made for freight traffic travelling to and from the channel port at Dover who would no longer need to cross the River Thames via the Dartford Crossing. The DCO Application is supported by a Transport Assessment (TA) (Application Document 7.9). The TA forecasts no significant adverse impacts on public transport networks. There are some temporary impacts on walkers, cyclists and horse riders (WCH) but, overall, the Project would result in an improved network for WCH with the provision of over 30km of new footpaths, bridleways and shared tracks. It is also supported by a Framework Construction Travel Plan (Application Document 7.13). The TA is / would be supported by the following documents which will address transport impacts during construction: • Construction Logistics Plan • Construction Traffic Management Plan • Outline Traffic Management Plan for Construction (Application Document 7.14) • Site Specific Travel Plans for individual or groups of compounds or Utility Logistics Hubs (ULHs) prepared in accordance with the Framework Construction Travel Plan. Delivery of these documents is secured through the traffic management plan which, in turn, is secured through Requirements 10 and 11 of Part 1 to Schedule 2 of the dDCO (Application Document 3.1).

Policy	Policy guidance	Policy assessment
	safeguarded on the Policies Map and proposals that would prejudice these will be refused. 5.5.43 The Council will support proposals which improve the efficiency of freight transport and provide opportunities for alternatives to road transport where possible.	National Highways also proposes to implement a monitoring scheme as defined within the Wider Networks Impacts Management and Monitoring Plan (Application Document 7.12) to monitor the impacts of the Project on the wider network and actively engage with local authorities on the findings and help secure Government funding for further projects to address these impacts. This will be secured in accordance with Requirement 14 of Part 1 to Schedule 2 of the dDCO (Application Document 3.1). Paragraph 6.7.6 of the TA (Application Document 7.9) identifies the locations of three bridges over HS1 where the Project would be in close proximity to HS1. It does not identify any direct impacts on HS1 or Crossrail, nor any activity which would prejudice their operation or implementation.
Policy CS12: Green Infrastructure	A multi-functional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained. The network will improve access within the urban area, from the urban area to the rural area and along the River Thames. The key parts of the network are identified on Figure 19: Strategic Infrastructure Network. Sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, followed by nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity. There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the	Each of the policy criteria are addressed in turn below. **Network of Green Spaces** A Green Infrastructure Study (Appendix H to this Planning Statement) sets out the 'bigger picture' for the delivery of large-scale Green Infrastructure focusing 'on land that is to be safeguarded, managed or secured in positive ways to create a multifunctional network of green spaces and assets for which investment can deliver the greatest range of sustainable benefits.' The Project route would potentially impact on a number of Green Infrastructure spaces in Gravesham, including country parks, Public Rights of Way (PRoW), community forests, the Kent Downs Area of Outstanding Natural Beauty (AONB), Conservation Areas and a Registered Park and Garden.

Policy	Policy guidance	Policy assessment
	biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development. Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site of off-site, including measures for ongoing maintenance. The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant.	The design of the Project, has, wherever possible sought to avoid impacts on Green Infrastructure by reduced residual effects through embedded mitigation measures. Within the Borough this includes: • Replacement of land and landscape features • Three green bridges • Extensive woodland planting at the junction with the A2 • Further linear planting adjacent to the Project route to aid visual screening and landscape integration. Details of these proposals are provided in Chapter 13: Population and Human Health of the Environmental Statement (ES) (Application Document 6.1). Additionally, the chapter states that within the Borough, all PRoWs, bridleways and cycle routes will be re-linked, along with a number of additional and improved routes for walkers, cyclists and horse riders (WCH). **Biodiversity** There are a number of sites designated for their biodiversity value within Gravesham, including: • Thames Estuary and Marshes SPA and Ramsar site • South Thames Estuary and Marshes SSSI • Shorne and Ashenbank Woods SSSI. The protection of the above designated sites has been considered during the design of the Project, further details of which are provided in the Project Design Report (Application Document 7.4). Chapter 8: Terrestrial Biodiversity of the ES (Application Document 6.1) concludes that the Project is expected to result in significant permanent habitat loss at Shorne

Policy	Policy guidance	Policy assessment
		and Ashenbank Woods SSSI during the construction phase, though this will be compensated for, in part, with tree planting to the west, north and east of Shorne Woods, designed to link existing areas of woodland, including Great Crabbles Wood, Shorne Woods and Claylane Wood. However, as the area of ancient woodland is considered to be irreplaceable, it is considered that a minor adverse impact would occur, although the overall integrity of the SSSI would be maintained. The proposed habitat creation would increase the extent of this habitat type in this area, helping to protect the resilience of Shorne and Ashenbank Woods SSSI and provide connectivity for species, further safeguarding the integrity and conservation status of the SSSI. This would provide a minor permanent improvement to the biodiversity resource in the area. In terms of the maintenance of any new landscaping and habitat creation, this would be secured through REAC (Application Document 6.3) commitment LV03: Landscape Maintenance which would be secured through Requirement 4 of Part 1 of Schedule 2 of the dDCO (Application Document 3.1). **Biodiversity net-loss** National Highways has committed to achieving no net loss in biodiversity by the end of Road Investment Strategy (RIS) 2 period (2020-2025) and will work towards net biodiversity gain by 2040. Funding for the Project falls within RIS 2 and RIS 3 (2025-2030). Appendix 8.21: Biodiversity Metric Calculations to Chapter 8: Terrestrial Biodiversity of the ES (Application Document 6.3) presents the results of a biodiversity metric assessment to support the Environmental Impact

Policy	Policy guidance	Policy assessment
		Assessment (EIA) of the Project. Appendix 8.21 demonstrates there would be no net loss of biodiversity as calculated by the metric this is balanced against the new areas of habitat and landscaped creation proposed as part of the Project (which are not counted in the metric) and against the benefits of the Project as a whole (outlined in Application Documents 7.1 Need for the Project and Application Document 7.20 Benefits and Outcomes document). **Kent Downs AONB** The Project interacts with the Kent Downs AONB and its setting at its north-western extent within the Borough. Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects of the ES (Application Document 6.3) have considered the potential effects of the Project on the landscape character and visual amenity in respect on the AONB. In considering the overall impact of the Project on the AONB, Chapter 6 of this Planning Statement has concluded that the landscape and environmental impacts of the Project on the landscape character and features of the AONB's special qualities would be permanent as well as temporary, notwithstanding the proposed mitigation measures. The chapter identifies the exceptional circumstances justifying development within the AONB. Figure 2.4: Environmental Masterplan of the ES (Application Document 6.2) sets out the proposed approach to environmental design for the Project, including proposals for land within the Borough.

Policy	Policy guidance	Policy assessment
Policy CS13: Green Space, Sport and Recreation	The Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with an adequate, up to date and relevant evidence base. A set of consistent green space, playing pitch and sports provision standards will be established which will apply to all new development. Provision should be made on-site. However, where this is not possible because of the site size, location or other specified circumstances, alternative provision or the enhancement of existing facilities will be required off-site. In all cases, provision will include arrangements for the ongoing maintenance of the space.	Chapter 13: Population and Human Health of the ES (Application Document 6.1) sets out the provision of replacement land for areas of permanent land take affecting public open space. Further details on open space (and replacement land) is provided in Appendix D of this Statement and in the Statement of Reasons (Application Document 4.1). Within the Borough, a number of open spaces are permanently impacted by the Project, for which replacement land of equal to or greater in size and of equivalent quality and accessibility to that required for the Project is to be provided, in line with this policy. The following open space areas are impacted by the Project: • Southern Valley Golf Club • Gravesend Golf Centre • Jeskyns Community Woodland • Shorne Woods Country Park and Ashenbank Woods • Claylane Wood • Cyclo Park • Shorne Marshes • Michael Gardens Play Area. An assessment of the impact and the requirement for compensation is reported in Appendix D for Open Space and Appendix G for Recreational Land, of this Planning Statement. The special category land impacted and any proposed replacement land is identified on the Special Category Land Plans within the Book of Plans (Application Document 2.4) and would be secured through the Environmental Masterplan (Figure 2.4 Application Document 6.2) of the ES.

Policy	Policy guidance	Policy assessment
Policy CS18: Climate Change Shortened Policy	**Flood Risk** 5.4.36 With the exception of the previously developed sites along the Thames Riverside (see Policies CS03, CS04 and CS05) and those other regeneration sites which have already been evaluated in accordance with the sequential and exception tests at the application stage, development will be directed sequentially to those areas at least risk of flooding. 5.14.37 Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment (in accordance with national policy and Environment Agency standing guidance as appropriate) and a Flood Risk Management Plan (if required) to demonstrate that they are adequately defended and safe over their lifetime. Planning permission will be refused for schemes which do not pass the sequential and exception tests. 5.14.38 The Council will priorities the maintenance, improvement or replacement of flood defence infrastructure over other land uses where relevant. In addition to meeting their own flood defence and management needs, the Council will expect new developments to take advantage of opportunities to reduce the causes and impacts of flooding from all sources where it is technically and financially feasible. **Water Quality** 5.14.39 As part of its approach to climate change and environmental improvement, the Council will have regard to the delivery of the Water Framework Directive and associated Thames River Basin Management Plan objectives to support water bodies being progressively improved to 'good' status over the plan period. Sustainable Drainage and Surface Water Run-Off	Each of the policy criteria are addressed in turn below. **Flood Risk** Chapter 14: Road Drainage and the Water Environment of the ES (Application Document 6.1) has assessed the impacts of the Project on road drainage and the water environment during the construction and operational phases. A Flood Risk Assessment (Appendix 14.6 FRA) to the ES (Application Document 6.1)) has been prepared for the Project. Chapter 14 identifies potential sources of flood risk in relation to the Project. The FRA has also provided further details in relation to the Sequential and Exception tests. Within the Borough, there is a small area lying within Flood Zone 3 (high probability of river and sea flooding) from the south bank of the River Thames to just north of the A226. At this point the Project route would be in tunnel. The remainder of the Project route within the Borough is within Flood Zones 1 or 2 (low to medium probability of flooding). The FRA states that there is no significant risk of flooding from rivers, sea, sewers, water mains or reservoirs along that part of the Project route in the Borough. Surface water flood risk from highway runoff would be mitigated by the inclusion of highway drainage provisions. Flood resilience is provided by making allowances for climate change in the highway drainage design. **Water Quality** Appendix 14.7: Water Framework Directive Assessment to Chapter 14: Road Drainage and the Water

Policy	Policy guidance	Policy assessment
	5.14.40 The Council will seek to minimize the impact of drainage from new development on waste water systems. In particular, the Council will: • Require that surface water run-off from all new development has, as a minimum, no greater adverse impact that the existing use • require the use of Sustainable Drainage Systems on all developments where technically and financially feasible. **Carbon Reduction** 5.14.42 The Council will seek to reduce the overall carbon footprint of the Borough.	Environment of the ES (Application Document 6.1) concludes that none of the activities associated with the Project would prevent or undermine future actions to enable water bodies to achieve good status. Chapter 14 also includes a number of good practice measures for improved water quality, including the following: • Regularly inspecting and maintaining work site drainage systems to ensure they operate to their design standard. • Equipment such as spill kits, absorption mats will be made easily accessible on-site and personnel would be trained in using them. • Drainage infrastructure and treatment systems will be inspected and maintained in accordance with National Highways requirements. **Sustainable Drainage and Surface Water Run-Off** A Strategy for managing operational surface water drainage has been prepared centred on the application of Sustainable Drainage Systems (SuDS), appropriate to local conditions. The strategy is summarised in the FRA. **Carbon Reduction** Paragraph 3.8 of the NPSNN notes that the impact of new road development on aggregate levels of emissions is likely to be very small, especially when considered in the context of wider policy initiatives to reduce carbon emissions. Chapter 15: Climate, of the ES (Application Document 6.1) assessed the potential 'worst-case scenario' impacts of the Project on greenhouse gas emissions and its vulnerability to climate change. The

Policy	Policy guidance	Policy assessment
		ES is supported in this regard by a Carbon & Energy Plan (Application Document 7.19). Appendix I: Carbon Strategy and Policy Alignment demonstrates the Applicant's approach to carbon emissions generated by the project and methods for reducing them and sets out how the Project would contribute to the UK's net zero carbon goal. It shows how the Applicant has acted to reduce emissions by including mitigation measures embedded in the preliminary design and by embedding carbon reductions in the construction stage through the procurement process to ensure that the Contractors are contractually bound to comply with relevant commitments made as part of this application. These measures and an explanation of how they will be secured through the REAC (Section 7 of the CoCP, Application Document 6.3) are set out in Table 2.1 of the Carbon & Energy Plan.
Policy CS19: Development and Design Principles Shortened Policy	New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below: • New development will be located, designed and constructed to: avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination	Each of the policy criteria are addressed in turn below. **Safeguarding Amenity** Chapter 7: Landscape and Visual of the ES (Application Document 6.1) has evaluated the impact of the Project on the visual amenity of the wider area in accordance with the NPSNN. It is acknowledged that a development of this scale will have unavoidable impacts though notes the mitigation being proposed will help reduce the Project's visibility within the wider area. **Lighting** Lighting will be designed in accordance with relevant highway and transport guidance and will be designed to reduce light spill and pollution. Chapter 6 of this

Policy	Policy guidance	Policy assessment
	not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems. • New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure • New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise • New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users • The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use • New development will incorporate appropriate facilities for the storage and recycling of waste • The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.	Planning Statement provides details of the lighting to be used along the Project route. The Landscape and Visual Assessment complies with the Institution of Lighting Professional's (2020) Guidance Notes on the Reduction of Obtrusive Light – Guidance Note 01/20 with respect to light pollution effects and impacts on landscape character and visual amenity. Mitigation measures to reduce the impact of light pollution will include reduced lighting column heights and the use of LED luminaires to reduce light spill. This will be secured through the Register of Environmental Actions and Commitments (REAC) (Appendix 2.2, Application Document 6.3) of the ES. **Design** The Project Design Report (Application Document 7.4) and Design Principles (Application Document 7.5) capture the key principles that have shaped the design of the Project, with a commitment that these would be maintained and developed in the detailed design and delivery phases of the Project. The Project Design Report sets out the following design principles for the Project within Gravesham: • To retain the historic woodland landscape character within the Kent Downs Area of Outstanding Natural Beauty (AONB), and to screen the Project from users of Shorne Woods Country Park. Existing planting along the northern edge of the A2 corridor shall be retained as far as practicable • To reduce the visual impact of the Project on users of Cobham Hall, with woodland adjacent to and within Cobham Park to be retained as far as practicable

Policy	Policy guidance	Policy assessment
		• To reduce the impact on the Kent Downs AONB, the width of the A2 corridor shall be restricted as far as practicable • The landscape and mitigation proposals would draw inspiration from the extensive deciduous woodlands surrounding large arable fields, thick deciduous shaws and hedgerows to ensure they complement and strengthen the existing character. The response to paragraphs 4.28 – 4.35 of the NPSNN Accordance Table in Appendix A to this Statement provides further details on how the Project has been developed to comply with good design. **Air Quality** Chapter 5: Air Quality of the ES (Application Document 6.1) concludes that the operation of the Project would result in both improvements and deteriorations in local air quality as a result of Project-associated changes in traffic flows. There are no predicted exceedances of PM10 or PM2.5 AQS objectives at human receptors across the study area with or without the Project, which is not considered to result in any significant air quality effects. **Noise** Chapter 12: Noise and Vibration of the ES (Application Document 6.1) has identified, through its noise assessment that a number of receptors in the Borough are predicted to exceed noise levels during the construction phase. The assessment also sets out the likely significant effects from operational road traffic noise in the Borough which show both adverse and beneficial effects, concluding that any operational

Policy	Policy guidance	Policy assessment
		effects have been mitigated to a minimum and would be acceptable with regard to UK noise policy. **Light Pollution** Chapter 7: Landscape and Visual of the ES (Application Document 6.1) states that light pollution along the A2 and elsewhere along the Project route may further impact the setting of Kent Downs AONB, recognising that the A2 street lighting is already a noticeable night-time feature with impacts on the darker night skies within the AONB. Embedded landscape mitigation, including that for light pollution, are set out in the Register of Environmental Actions and Commitments (REAC) Appendix 2.2 (Application Document 6.3) of the ES. Mitigation for light pollution in the AONB includes: • Minimising lighting column heights • Use of LED luminaires with reduced light spill. **Land Contamination** Chapter 10: Geology and Soils of the ES (Application Document 6.1) has identified areas of contamination risk through desk-based research and intrusive ground investigation. The assessment has shown that within the Borough, there is a high-risk source of land contamination at the former petrol filling station on the north side of the A2. There are also a number of medium risk sites including other petrol filling stations, an electricity substation and Southern Valley Golf Course. Contractors will be required to have regard to the Outline Remediation Strategy within Appendix 10.11 of the ES (Application Document 6.3), which identifies

Policy	Policy guidance	Policy assessment
		techniques to be implemented in remediating ground contamination. **Water Environment** As referred to in Policy CS18 above, none of the activities associated with the Project would prevent or undermine future actions to enable water bodies to achieve good status under the Water Framework Directive (WFD) (ES Appendix 14.7 (Application Document 6.3)). **Landscaping** Table 7.11 within Chapter 7: Landscape and Visual of the ES (Application Document 6.1) identifies the project wide steps that have been taken to minimise and mitigate the operational impacts of the Project on the landscape. Table 7.12 details the project wide construction good practice measures, Table 7.13 details the operational good practice measures project wide, Table 7.14 provides detail of the essential construction mitigation, Table 7.15 operational essential mitigation and Table 7.16. enhancement measures. Landscape mitigation is also identified in the Design Principles (Application Document 7.5) along with a strategy for the Project which sets out where possible, the use of trees, shrub and grassland species that would not only provide landscape mitigation (screening and integration) functions, but also offer wider biodiversity benefits and adaptability against the backdrop of climate change. The outline Landscape Ecological Management Plan (oLEMP) (Application Document 6.7) secures the spatial extent and location of landscape and ecology elements required for mitigation. The objectives include landscape integration and visual screening through additional tree

Policy	Policy guidance	Policy assessment
		planting. The oLEMP is secured through schedule 2 requirement 5 of the dDCO (Application Document 3.1). **Biodiversity Enhancement** Embedded mitigation specific to the Kent section of the project is included within the Design Principles (Application Document 7.5) and on Figure 2.4: Environmental Masterplan (Application Document 6.2) which would be legally secured through dDCO Requirements 3 and 4 (Application Document 3.1). Good practice and essential mitigation are included in the Register of Environmental Actions and Commitments (REAC). The REAC forms part of the Code of Construction Practice (CoCP) (Application Document 6.3) which would be legally secured through DCO Requirement 4. Mitigation measures which apply on a project wide basis (including best practice measures) are detailed within Chapter 6 of this Planning Statement. **Resilience to Climate Change (including Flood Risk)** Chapter 15: Climate, of the ES (Application Document 6.1) assesses the potential 'worst-case scenario' impacts of the Project on greenhouse gas (GHG) emissions and the vulnerability of the Project to climate change during construction and operation. It outlines how the Project has applied and developed measures to avoid/prevent, reduce and remediate the Project's GHG emissions. These measures have been applied and developed in helping contribute to the UK's target for reduction in carbon emissions. **Carbon Reduction** The Application is also supported by a Carbon & Energy Management Plan (Application Document 7.19).

Policy	Policy guidance	Policy assessment
		The Plan explains that the Project has been designated a pathfinder project to explore carbon neutral construction and to support the Applicant's broader plan to become a Net Zero business. This Plan quantifies the likely carbon emissions generated by the project and methods for reducing them and sets out how the Project will contribute to the UK's net zero carbon goal. It shows how the Applicant has acted to reduce emissions by including mitigation measures embedded in the preliminary design and by embedding carbon reductions in the construction stage through the procurement process to ensure that the Contractors are contractually bound to comply with relevant commitments made as part of this application. These measures and an explanation of how they will be secured through the REAC (Section 7 of the CoCP, Application Document 6.3) are set out in Table 2.1 of the Carbon & Energy Plan. **Waste** The Excavated Materials Assessment (ES Chapter 11 Appendix 11.1 (Application Document 6.3)) has determined that all inert excavated material would be reused within the Project design and therefore the volume of surplus inert excavated material is assumed to be zero. **Safety and Security** Matters of safety and security have been embedded in the design of the Project from the outset as identified in the Project Design Report (Application Document 7.4) and the Design Principles (Application Document 7.5).
Policy CS20: Heritage and the Historic Environment	5.16.10 The Council will accord a high priority towards the preservation, protection and	Chapter 6: Cultural Heritage of the Environment Statement (ES) (Application Document 6.1) examines

Policy	Policy guidance	Policy assessment
Shortened Policy	enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present. 5.16.11 Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance of the Boroughs heritage assets, their setting where it contributes to the significance of the asset and their interpretation and enjoyment, especially where these contribute to the distinct identity of the Borough. These include: • Gravesend Town Centre, its development as a heritage riverside town, and its setting • the Boroughs urban and rural conservation areas • Surviving built features and archaeology relating to the Boroughs maritime, military, industrial and transport history. 5.16.12 When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset. For non-designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.	the potential effects of the Project on cultural heritage during both the construction and operational phases. The assessment of effects on cultural heritage has considered construction and operation effects on archaeological remains, built heritage and historic landscapes. Assessments were undertaken in accordance with the Design Manual for Roads and Bridges (DMRB) LA 104 and LA 106, taking account of best practice advice produced by Historic England and the Chartered Institute for Archaeologists. Information regarding the historic environment in Section 6.4 of Chapter 6 has been obtained from relevant sources including Historic Environment Records. Table 6.8 within Chapter 6 Cultural Heritage of the ES (Application Document 6.1) sets out the cultural heritage impacts arising from the Project, taking into account mitigation measures such as archaeological investigation and historic building recording. This includes the following impacts on cultural heritage assets within the Borough: • Moderate adverse significant temporary and permanent effects on Thong Conservation Area • Moderate adverse significant effect to high value Grade II* Registered Park and Garden at Cobham Hall • Moderate adverse effect to high value Grade II* Listed Building, Church of St Mary. Building recording (secured by REAC Ref No. CH001; AMS-OWSI No. 2) would help mitigate the loss of the WW1 Homes for Heroes, however, no mitigation has been identified that would offset the truncation of the

Policy	Policy guidance	Policy assessment
		northern end of the Thong Conservation Area and the significant changes to its setting. Due to the scale of the impact of the Project, no further opportunities exist to enhance or better reveal the significance of the Conservation Area. However, the Design Principles (Application Document 7.5) incorporates a number of proposals based on interpretation of historic features to better reveal the significance of heritage assets: • PEO.07 WCH: heritage interpretation - during the detailed design phase the Project shall consider and implement an approach for signage and wayfinding for the PRoW network that includes interpretation of relevant historic features in and of the landscape and their role in the development of that place/area • LSP.07 respecting historic landscape - to protect views across historic landscape and topography, the new landscape design would take account of local landscape character, respect historic features and reference historic land use, patterns and boundaries • S9.05 heritage interpretation along Two Forts Way – landscaping and interpretation to better reveal the significance of the relationship between the Tilbury and Coalhouse Forts. Mitigation for impacts to the Registered Park and Garden at Cobham Hall include planting to reduce the visual impacts to Cobham Hall and the design of new landforms between the Project route and High Speed 1 within the setting of Cobham Hall. The change to the setting within the northern parts of the Park would result

Policy	Policy guidance	Policy assessment
		in a minor magnitude permanent impact to this high value asset, resulting in a moderate adverse significant effect. The Grade II* Listed Church of St Mary is located to the north of the proposed South Portal and close to a temporary construction compound. The construction activity would change the current setting, causing a moderate adverse effect to this high value asset. Table 6.8 of ES Chapter 6 Cultural Heritage (Application Document 6.1) provides a summary of the proposed mitigation measures to minimise the likely significant effects on heritage assets as a result of the Project. The ES Chapter 6: Cultural Heritage (Application Document 6.1) describes embedded mitigation during the construction and operational phases. The ES Chapter 6: Cultural Heritage (Application Document 6.1) assessment details area-specific Design Principles for the Kent Section of the Project route Noise Impacts would be minimised by the Project Design and incorporation noise impact mitigation during the construction and operational phases. Embedded mitigation are measures that form part of the engineering design, are included within the Design Principles (Application Document 7.5) or as features presented on Figure 2.4: Environmental Masterplan (EMP) (Application Document 6.2). Measures which are specific to the Kent section of the project are addressed within Sections 5.1 to 5.3 of the document.

Table C.7 Gravesham Local Plan Regulation 18 Stage 2 Consultation Part 2: Development Management Policies Document October 2020

Policy	Policy guidance	Policy Assessment
Text (not policy) Para 3.1.4	The Council is committed to preserving the openness of the Green Belt and will only support development where it is compatible with national policies for protecting the Green Belt and policies in this plan. Inappropriate development in the Green Belt will not be approved unless the applicant can demonstrate the existence of 'very special circumstances' that clearly outweigh harm to the Green Belt and any other harm. When considering planning applications, the Council will give substantial weight to any harm which may be caused to the Green Belt.	The Metropolitan Green Belt accounts for approximately 78% of the Borough of Gravesham's total land area. Appendix E of this Planning Statement assesses the planning issues raised by the location of the Project within the Green Belt. Chapter 7 assesses the Project in regard to the relevant local policies (including in Gravesham Borough). The assessment acknowledges that the Project as a whole constitutes 'inappropriate' development in the Green Belt. In such a situation, the NPSNN requires an applicant to demonstrate that there are very special circumstances which override the general presumption against inappropriate development in the Green Belt. This is demonstrated in Appendix E to this Planning Statement which provides a detailed assessment of the case for the Project to be located in the Green Belt including the very special circumstances which apply. Those very special circumstances include the following considerations: • The defined and overriding need (including national policy need) for the Project in this particular location (Application Document 7.1 and summarised in section E5 of Appendix E) • The absence of suitable, viable alternatives (Chapter 3: Assessment of Reasonable Alternatives of the ES, Application Document 6.1) and in Chapter 5 of this Planning Statement • Local, regional and national economic benefit; (Application Document 7.1)

Policy	Policy guidance	Policy Assessment
		• The Green Belt policy context (in terms of the purposes of Green Belt, proposed mitigation and benefits) • The temporary or limited nature of many of the impacts. Further details regarding the 'need' case for the Project, as a form of linear infrastructure (paragraph 5.171 of the NPSNN) is provided in The Need for the Project (Application Document 7.1).
Policy AG1: Agricultural Land	4.1.11. Unless allocated through the Local Plan, applications for development which are not for agriculture and affect agricultural land identified as being potentially best or most versatile (Grades 1, 2 and 3a) must be accompanied by an agricultural land classification survey in order to confirm the quality of the land. Where there would be significant loss of agricultural land,i applications must also be accompanied by evidence of a thorough search for and analysis of alternative development sites and a farm viability assessment. 4.1.12. Development on agricultural land and not for the purposes of agriculture will only be permitted when there is an overriding need which cannot be met within the urban area; within rural settlements inset from the Green Belt or on other previously developed land. Subject to this overarching proviso, the following policy tests will be applied. 4.1.13. Development on the best and most versatile agricultural land (Grades 1, 2 and 3a) will not be permitted unless: • the site is allocated in the Local Plan • there is no alternative site on land of a lower grade or lower grade land has a landscape, wildlife or heritage	It is acknowledged that the Project would result in the loss of some best and most versatile agricultural land. Surveys have been undertaken which indicate that, in the area south of the River Thames which covers Gravesham Borough, there is estimated to be a loss of 379.49ha of Best or most versatile agricultural land (BMV) (Table 3.6 of Appendix 10.4: Agricultural Land Classification Factual Report to the ES (Application Document 6.1). Of this, only 17.22ha is Grade 1 with the majority being Grade 2 (272.92ha) and the remainder (89.35ha) being Grade 3a. In spite of this, and even though 41% of the BMV loss would be temporary (and would be replaced post-construction), the loss of BMV is still considered a significant adverse effect which cannot be directly mitigated. However, this loss must be weighed in the balance against the benefits this Project would bring as identified in the Need for the Project (Application Document 7.1). An examination of alternative routes for the scheme is presented in Chapter 5 of this Planning Statement Accordingly, it is the applicant's view that the benefits significantly outweigh this loss and, as such, the delivery of the

Policy	Policy guidance	Policy Assessment
	designation which outweighs agricultural considerations • it is development which is not inappropriate within the Green Belt or otherwise can be justified by very special circumstances • it can avoid fragmentation and the loss of viability of remaining high quality agricultural land • the economic, social or environmental benefits of the proposal outweigh the loss. i For the purposes of applying this policy, 'significant loss of agricultural land' should be taken to mean development involving: (i) The loss of not less than 20 hectares of grades 1, 2 or 3a agricultural land which is for the time being used (or was last used) for agricultural purposes (ii) The loss of less than 20 hectares of grades 1, 2, or 3a agricultural land which is for the time being used (or was last used) for agricultural purposes, in circumstances in which development is likely to lead to a further loss of agricultural land amounting cumulatively to 20 hectares or more.	Project accords with the requirements of the NPSNN and so meets the requirements of this Policy.
Policy INF-1: Route Safeguarding	6.1.8. Land required for the following safeguarded schemes will be shown on the Local Plan Policies Map and development proposals that would prejudice these or any subsequent schemes subject to safeguarding will be refused: • Possible future extension of Crossrail • Protection of the High Speed 1 (HS1) railway • Thames Way dualling in Ebbsfleet • Lower Thames Crossing	Delivery of the Project would not impact on the safeguarding of these schemes. Although there are bridges which cross the HS1 railway line in close proximity of the Project, the TA (Application Document 7.9) demonstrates that there would be no impacts on users of the bus or rail network when the Project is in operation. Design measures are embedded in the construction process to avoid any significant construction impacts on HS1 at the M2/A2/A122 junction in Kent (see Application Document 7.4: Project

Policy	Policy guidance	Policy Assessment
	• A2 Ebbsfleet junction	Design Report, Part D1: General Design South of the River).
Policy INF-2: Transport Design Principles	6.2.24. Development management decisions will be taken in the context of achieving the following sustainability objectives, as far as is practicable, given the context of proposals and their characteristics: • Rebalancing the transport system towards walking, cycling and public transport • Making better use of the River Thames for the transportation of both passengers and goods • The creation of healthy streets and public realm • The reduction in road danger, both in town and the country – particularly on rural lanes • Improving air quality. 6.2.25. Proposals should give priority to pedestrian and cycle movements and facilitate, as far as is possible, high-quality public transport, within safe secure and attractive environments, which minimise potential for conflict between motorised and non-motorised users. The needs of people with disabilities and reduced mobility should also be addressed. 6.2.26. Developments likely to generate high levels of vehicular traffic (and in particular commercial vehicular traffic in the form of heavy and light goods or passenger service vehicles) should be well located relative to the highway network to minimise impacts on local roads or other environmentally sensitive areas. 6.2.27. Provision should be made for: • the safe and efficient delivery of goods • access by service and emergency vehicles	Various application documents set out how the Project design, implementation and operation would address transport and traffic impacts (see INF-3 below). As the Project is a road-based transport project it would have impacts on the local road network. However, despite this, it is accompanied by a significant package of measures which would be of benefit to WCH not least in the form of tens of kilometres of new or improved footpaths, bridleways and shared routes and tracks which would encourage more walking and cycling. Assessments have been undertaken of air quality impacts in Gravesham Borough, not least the Gravesham A2 AQMA and ecological sites in the borough. These are summarised in Chapter 6 of this Planning Statement. The conclusion on the issue is that the scheme has been designed to minimise air quality impacts and further mitigation and compensation is provided to address residual impacts. These conclusions are detailed in Appendix 5.6 of the ES (Application Document 6.1) the Project Air Quality Action Plan and include the nitrogen deposition compensation sites. In terms of road danger / safety and safety on the movement networks, this is addressed in the TA (Application Document 7.9), Chapter 9 of which specifically addresses the matter of road safety. It notes that the scheme has been designed in accordance with safety standards set in the DMRB and subject to a stage 1 road safety audit which did not raise any significant issues but made a number of proposals which have been addressed in the Project. Road safety would

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	• the requirements of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations, unless otherwise justified as an exception. 6.2.28. Proposals for major development requiring either a Design and Access Statement or a formal Transport Assessment should set out how the above issues are addressed and the contribution made to securing the stated sustainability objectives.	continue to be monitored and addressed throughout the construction and operation of the project through the preparation of a suite of documents including the CoCP (Application Document 6.3), the Wider Network Impacts Management and Monitoring Strategy (Application Document 7.12); a Framework Construction Travel Plan (Application Document 7.13); an outline Traffic Management Plan for Construction (Application Document 7.14); are submitted as part of this application. In addition, Site Specific Travel Plans for each compound or ULH or groups of compounds or ULH where these are closely located with similar levels of accessibility would be produced which will also address these matters during construction.
Policy INF-3: Understanding and Mitigating Transport Impacts	6.2.29. Development proposals will be required to meet the transport needs generated in a sustainable manner having regard to the principles set out in policy INF 2. They should consider avoiding before mitigating any unacceptable impacts on the safety and operation of the highway, public transport and public rights of way networks or the river as necessary. 6.2.30. Applications should be supported by a proportionate evidence base detailing baseline and future transport conditions and the likely impact of the proposed development, both alone and in combination with other known proposals, as appropriate 6.2.31. Large or complex proposals or proposals with the potential to have unacceptable impacts in areas with existing transportation or associated air quality problems should be supported by a formal Transport Assessment, undertaken in accordance with national and local policy guidance and may also require the production of a Travel Plan, as part of any mitigation package.	The Project would have an impact on the highway network which would see some increase in traffic on local roads both during the construction and operation of the Project. However, this needs to be considered in the wider regional and national transport, connectivity and economic contexts in terms of the need for the Project (Application Document 7.1) and the existing highways congestion which will be relieved at the Dartford Crossing (see Application Document 7.1: Need for the Project). The DCO Application is supported by a Transport Assessment (Application Document 7.9). The TA forecasts no significant impacts on public transport networks. There are some temporary impacts on walkers, cyclists and horse riders (WCH) but, overall, the Project would result in an improved network for WCH with the provision of over 30km of new footpaths, bridleways and shared tracks.

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	6.2.32. Sufficient parking in new development will be provided in accordance with the Council's adopted parking standards which will reflect the availability of alternative means of transport, accessibility to services and facilities, and the objective to secure a modal shift to more sustainable modes. 6.2.33. Proposals that have an unacceptable impact on highway safety or result in a severe residual cumulative impact on the road network following mitigation or do not contribute positively toward the achievement of the aims of policy INF 2 will not be permitted. i. For the purposes of this policy 'severe adverse impacts', refer to the outcome of a Transport Assessment or Statement which varies from each development. It will be for the local planning authority in consultation with the relevant highway authority to determine what impacts there are and whether they consider these to be an unacceptable or "severe" impact on the local area, after considering what mitigation measures are being proposed in each circumstance.	It is also supported by a Framework Construction Travel Plan (Application Document 7.13). The Transport Assessment (Application Document 7.9) is supported by the Outline Traffic Management Plan for Construction (Application Document 7.14). In addition, Site Specific Travel Plans for each compound or ULH or groups of compounds or ULH where these are closely located with similar levels of accessibility would be produced which will also address these matters. Delivery of these documents is secured through Requirements 10 and 11 of Part 1 to Schedule 2 of the dDCO (Application Document 3.1). National Highways also propose to implement a monitoring scheme as defined within the Wider Networks Impacts Management and Monitoring Plan (Application Document 7.12) to monitor the impacts of the Project on the wider network and actively engage with local authorities on the findings and help secure Government funding for further projects to address these impacts. This will be secured in accordance with Requirement 14 of Part 1 to Schedule 2 of the DCO (Application Document 3.1).
Policy INF-4: New Accesses and Junctions	6.2.34. All new or altered accesses and junctions should be appropriately sited and be of an appropriate scale, having regard to the levels of development, traffic and types of vehicle that are likely to need to use them. 6.2.35. All such accesses and new on-site highways associated with them should unless otherwise justified as an exception:	The application for the Project is supported by a TA (Application Document 7.9) which notes that the Project has been designed in order to comply with all relevant standards and guidance and to meet the requirements of the NPSNN which mirror the requirements of this policy.

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	• Accord with relevant highway design, construction and safety standards applicable at the time, with junctions incorporating visibility splays consistent with their intended use and characteristics of the highway to be accessed • Be provided with sufficient manoeuvring space to allow vehicles to enter and leave the site in forward gear • Ensure vehicles can easily reach the necessary loading, servicing, and parking areas on-site without the need for multiple manoeuvres • Not result in an unacceptable adverse impact on highway safety • Not result in a severe residual cumulative impact on the operation or the free flow of the highway network. 6.2.36. The impact of any new access and associated manoeuvring area or roadways on the character of the area, together with the impact of vehicles using those facilities on the amenity of neighbouring properties, will also be material considerations.	
Policy GI-1: Open Space, Playing Pitches and Sports Facilities Retention	7.1.15. Change of use or redevelopment of existing open spaces, indoor sports facilities or playing pitches and disused/lapsed school or college playing fields will only be permitted if the applicant demonstrates that: • the loss will be mitigated by equivalent replacement provision (in terms of quality, quantity and accessibility) • the development is for alternative sports/recreational use for which there is a greater need • the current use will be retained and enhanced through the provision of limited enabling development	Appendix D to this Planning Statement comprises an assessment of the impacts of the Project on open space and Appendix G provides an assessment of the project impacts of public recreational facilities. It notes that there would be some temporary impacts on a handful of sites during construction but also permanent impacts on two private sports facilities including the loss of the Southern Valley Golf Club (SVGC). However, overall, the scheme delivers a multiplicity of open space, Green Infrastructure (GI) and recreation benefits in the form of over 46km of new or improved footpaths, bridleways, cycleways and other tracks

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	7.1.16. In addition to the above, the redevelopment of private or public open space will not be permitted where there would be a significant individual or cumulative loss of open space or where there would be a negative impact on amenity, character and appearance, ecological connectivity or biodiversity of an area. 7.1.17. Support will be given to proposals that improve, increase or provide greater access to open spaces, indoor sports facilities and playing pitches in the Borough. 7.1.18. Where new schools are built, or existing schools are redeveloped or improved, and it results in the loss of areas of associated open space, the public benefits of new or improved school provision will be weighed against such loss. The Council will also have regard to any qualitative improvements in open space provision that is delivered as part of any such proposal and will seek to maximise community access to the sports facilities provided compatible with the educational use of such sites.	alongside compensatory open space provision in the form of a new landscaped public park ('Chalk Park'). Chalk Park would be greater in area than the entire area of SVGC golf course to be lost and would be functional and accessible for the wider community with connection to the wider environment. The impacts on open space and recreational facilities also need to be considered in the light of the wider benefits delivery of the Project would bring as set out in the Need for the Project (Application Document 7.1) and the Benefits and Outcomes Document (Application Document 7.20).
Policy GI-4: Trees, Hedgerows and Woodland	7.3.9. Development should be designed to retain trees, hedgerows and woodland that contribute positively to the amenity of the site and surrounding area and which are important in terms of landscape, townscape, biodiversity or heritage. Consideration should be given to the incorporation of trees and hedgerows within new development in the interests of sustainability, to integrate with and improve the quality of the local environment and to assist in place making. The use of locally sourced natural species in planting schemes will be expected unless otherwise justified as an exception. 7.3.10. Proposals which threaten the future retention of trees, hedgerows and woodland or other landscape	A development the scale of this Project will inevitably result in some adverse impacts on existing trees and hedgerows. Chapter 6 of this Planning Statement summarises the impacts of the Project on biodiversity and ecological conservation. It notes that the Project has been designed to avoid and minimise habitat loss as far as reasonably practicable and to maximise opportunities to conserve and enhance biodiversity. Considerable mitigation is also embedded within the scheme design and proposed to address any adverse impacts. There are numerous examples, but one is the provision of a number of green bridges which will provide substantial new tree and hedgerow planting.

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	features of importance to a site's character, the amenity of the surrounding area or to wildlife will not be permitted unless the need for, and benefits of, the development in that location clearly outweigh the loss and adequate mitigation and compensation measures can be secured. 7.3.11. In evaluating proposals, the greatest weight will be accorded the retention and protection from harm of areas of ancient woodland and aged and veteran trees, the loss of which will only be allowed in exceptional circumstances where the public benefit would clearly outweigh the loss or deterioration of habitat and a suitable compensation strategy exists. 7.3.12. Development proposals that have the potential to result in the loss of or harm to trees, hedgerows or woodland should be supported by a tree survey, arboricultural report and ecological report prepared by a suitably qualified professional setting out: • The location, species, size, health and characteristics of any affected trees, hedgerows or woodland including root spread on or adjoining the site likely to be affected by the development • The extent of proposed works and development relative to the features identified together with a plan and schedule of any trees, hedgerow or areas of woodland including root spread that would need to be removed or otherwise modified to accommodate the development • A plan and schedule of those trees, hedgerows or areas of woodland to be retained	While it is noted that south of the River Thames the scheme would result in the loss of 5.35ha of ancient woodland, it is proposed this would be mitigated by 48.75ha of new planting. Similarly, woodland losses of 5.85ha within Shorne and Ashenbank Woods SSSI would be compensated for by the provision of two blocks of new planting of 5ha to the north-west of Shorne Woods, and 9.1ha and 21ha immediately to the north and east of the Woods. This, and other related measures, would be secured through the EMP and the oLEMP which, in turn, are secured through Requirements 4 and 5 of Part 1 to Schedule 2 of the DCO (Application Document 3.1). The impacts on trees and hedgerows also need to be considered in the light of the wider benefits delivery of the Project would bring as set out in Application Document 7.1, The Need for the Project.

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	• The measures to be taken during the course of construction to avoid damage to those trees, hedgerows or areas of woodland to be retained • The ecological value of the assets to be lost and measures to be taken to avoid any unacceptable adverse impact on any nature conservation interest as a result of works to trees, hedgerows or areas of woodland • Outline proposals for how any loss or damage to trees, hedgerows or areas of woodland will be mitigated to secure environmental net gain. 7.3.13. Where the loss of trees, hedgerows or woodland have a potential landscape impact, the proposal should also be supported by a landscape report prepared by a suitably qualified person detailing those impacts and proposed means of mitigation. 7.3.14. Where planning permission is granted for proposals that result in the loss of or damage to trees, hedgerows or areas of woodland, conditions will be imposed requiring the submission of a final landscaping scheme for the prior written approval of the Council and details of how that landscaping will be maintained in the long-term, including provision for the replacement of planting that dies or becomes diseased before it becomes established.	
Policy GI-5: Landscape Character	7.4.13. Development proposals will be expected to contribute to and enhance landscapes in a manner commensurate with their status and achieve a high-quality design that is responsive to context and reinforces landscape character. 7.4.14. Applications for proposals that are likely to have an adverse landscape impact should be accompanied by	In accordance with paragraph 5.144 of the NPSNN, Chapter 7, Landscape & Visual, of the ES (Application Document 6.1) identifies the impacts of the Project on landscape character. The impacts are summarised in Chapter 6 of this Planning Statement. It is noted that, while there are likely to be significant impacts on landscape character and views in a number of character

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	a proportionate evidence base in the form of a statement or formal Landscape Visual Impact Assessment (as appropriate) prepared by a suitably qualified person setting out the nature and scale of any such impacts (including cumulative impacts) and how these will be mitigated. 7.4.15. In assessing potential impacts, particular regard will be had to: • Landform, topography, and any existing natural landscape features that may be affected by the proposals • The pattern and composition of trees and woodland • The type and composition of any wildlife habitats • The pattern of fields and the composition of boundaries • The impact of the proposals on the pattern and distribution of settlements, roads and footpaths • The traffic impact of proposals on the character of rural lanes • The presence and pattern of historic landscape features • The presence or absence of existing man-made or other vernacular features that contribute towards local distinctiveness and sense of place, including their setting, scale, layout, design and detailing 7.4.16. In addition to the above, within the Kent Downs AoNB and its setting, great weight will be accorded the conservation and enhancement of the landscape and scenic beauty of the designated landscape. The conservation and enhancement of wildlife and cultural heritage of the AoNB will also be accorded weight.	areas which are considered 'significant' in EIA terms, these would be mitigated through the extensive range of measures set out in Table 7.15 of Chapter 7 of the ES. These measures would be secured through the EMP and oLEMP which are secured by Requirements 4 and 5 of Part 1 of Schedule 2 of the DCO (Application Document 3.1). In terms of impacts on the Kent Downs AONB, this is addressed in Appendix F to this Planning Statement and summarised in Chapter 6.

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	7.4.17. Development proposals within the AoNB will only be permitted where: • Their location, form, scale, materials and design would conserve or make a positive contribution to the enhancement or restoration of landscape character • They would conserve or enhance the special qualities, distinctive character and existing tranquillity of the AoNB 7.4.18. Proposals for major development within the AoNB will only be permitted in exceptional circumstances, and where it is demonstrated, they are in the public interest, in accordance with national policy. 7.4.19. In determining applications, the Council will have regard to the Gravesham Landscape Character Assessment (or subsequent updates) and the Kent Downs AoNB Management Plan and associated guidance as material considerations.	
Policy GI-6: Biodiversity Shortened Policy	7.5.29. Development proposals should seek to achieve measurable net gains for biodiversity in accordance with national policy and guidance and be supported by proportionate evidence base prepared by a suitably qualified person demonstrating how this will be achieved. How the mitigation hierarchy (i.e. avoid, mitigate, compensate) has been applied in designing the scheme should also be demonstrated, with justification being provided for all unavoidable impacts on biodiversity. 7.5.30. Proposals for biodiversity net gain, mitigation or compensation will be required to be acceptable in terms of design, location and impact. Applicants will also be required to demonstrate that the delivery and long-term management of such measures can be secured.	The various habitats within the Project (including Gravesham Borough) support a range of species, which are described in detail within ES Chapter 8: Terrestrial Biodiversity (Application Document 6.1). Overall, it is considered that various biodiversity constraints within and adjacent to the project have been considered in detail through the consideration of reasonable alternatives and have informed the project design (in terms of both route alignment and also the embedded mitigation measures). Where there are impacts on biodiversity the most significant occur during the construction phase and so would be temporary. The various mitigation measures proposed within project over the construction and operational phase have sought to avoid significant harm to biodiversity and

Policy	Policy guidance	Policy Assessment
	7.5.31. Applications resulting in significant harm to biodiversity which cannot be avoided, mitigated or compensated for will not be permitted unless material considerations indicate otherwise. In addition to the requirements set out above: • Development that will have an adverse effect on the integrity of international/ European designated sites either alone or in combination with other plans or projects will not be permitted unless otherwise allowed for under national legislation and policy. • Development that will have an adverse effect on nationally designated sites either alone or in combination will not be permitted unless the benefits of the development (including overriding public interest) clearly outweigh harm and there is no acceptable alternative solution that would avoid such impacts. • Development resulting in the loss or deterioration of irreplaceable habitats will not be permitted unless there are wholly exceptional reasons where the public benefit would clearly outweigh such loss or deterioration and a suitable, acceptable and deliverable compensation strategy exists. • Development should avoid harm to locally identified biodiversity assets (including Local Wildlife Sites, Local Nature Reserves and Roadside Nature Reserves) as well as priority and locally important habitats and species, in accordance with national policy.	enhance the wider network of habitats in the longer term. Where unavoidable permanent impacts have been identified, the national benefits of the development have been shown clearly outweigh both the impacts upon designation and the relevant features of interest in each case. The Project, therefore, accords with the policies within the NPSNN.
Policy FW-1: Managing Water Quality	8.2.10. Proposals that enhance water quality in accordance with the objectives of the Water Framework Directive and Thames River Basin District RBMP objectives will be supported. Where development (alone	An assessment of the Project's potential impacts on the water environment is contained in Chapter 14 of the ES Road Drainage and the Water Environment (Application Document 6.1). That assessment is supported by a

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	or in combination) has the potential to have an adverse impact on water quality and the achievement of the above objectives, an assessment prepared by a suitably qualified person will be required detailing the nature and scale of such impacts and how such impacts will be addressed. Schemes that would be likely to result in an unacceptable reduction in water quality (having regard to any proposals to mitigate such impacts) will not be permitted.	number of other documents (ES Appendices Application Document 6.3) as follows: • Water Features Survey (Appendix 14.2) • Hydromorphology Assessment (Appendix 14.4) • Hydrogeological Risk Assessment (Appendix 14.5) • Freshwater Ecology (Appendix 8.4) • Water Framework Directive Assessment (Appendix 14.7) The EA and other relevant bodies have been consulted extensively and agreed methodologies for assessing flood risk and the scope of the hydraulic modelling of watercourses. The WFD Assessment (ES Appendix 14.7, Application Document 6.3) has concluded, taking into account measures embedded in the Project design, in combination with commitments to methods of construction and compound management which are documented in the CoCP (Appendix 2.2, Application Document 6.3) which would prevent or mitigate potential effects on surface, transitional or groundwater bodies that there would be no deterioration of biological quality, hydromorphology, physicochemical or specific pollutant supporting elements at the surface water body scale, at which WFD compliance is judged. In addition, the Project would not prevent the future attainment of the WFD objectives for each of the respective water bodies, nor pose barriers to implementing future measures described in the River Basin Management Plans to achieve these objectives.
Policy FW-3: Managing Flood Risk	8.4.18. Applications for planning permission will be determined in accordance with national planning policy	In that part of the Project lying within Gravesham Borough the majority lies in an area of low flood risk.

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	and guidance on flood risk. When considering proposals where flood risk is an issue, the Council will seek to secure an overall reduction in flood risk, wherever possible. Development will only be permitted where it will not be at an unacceptable risk of flooding on the application site itself, and there would be no unacceptable increase of flood risk elsewhere. 8.4.19. Where a development site is identified as being at risk of flooding, a site-specific Flood Risk Assessment (FRA) appropriate to the scale and nature of the development and the level of risk involved will be required in line with advice set out within national Planning Practice Guidance, having regard to the vulnerability of potential users or occupiers of the site. 8.4.20. The FRA should assess potential risk over the lifetime of the development and take into account the effect of climate change factors based on the most recent United Kingdom Climate Projections (UKCP) available at the time of the application. 8.4.21. Development proposals should be designed to withstanding flood loadings likely to be placed upon them and incorporate suitable flood protection and mitigation measures appropriate to the nature and scale of risk identified within the FRA to ensure that the safety of users and occupiers is assured over the lifetime of the development. 8.4.22. Proposals in areas potentially at risk of flooding should also be designed to be flood resilient. The Council will require evidence of how this has been taken into consideration at the application stage, with details of how such features are intended to be secured on the implementation of the scheme.	Where the Project is in an area of high flood risk it is within a tunnel. A Flood Risk Assessment (FRA) has been prepared and is presented as ES Appendix 14.6 (Application Document 6.3). The FRA deals with the NPPF's Sequential and Exception Tests and provides the rationale for those parts of the Project being located in Flood Zone 3. It factors in the possible effects of climate change (Section 4 of Part 6 of the FRA). Section 6.3 of Part 6 of the FRA identifies the mitigation measures which have been embedded within the scheme design and which would be delivered to minimise and mitigate flood risk. On this basis it is demonstrated that: • flood risk has been appropriately assessed against the relevant guidance with input from all relevant stakeholders • where appropriate the Sequential and Exception Tests have been passed so justifying parts of the Project being located in higher flood risk zones • where risk impacts have been identified, appropriate mitigation measures are either incorporated within the design of the Project or otherwise proposed to ensure to address this risk and ensure that the Project would be delivered in a safe and sustainable manner.

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	8.4.23. The need for Flood Risk Management Plans to manage residual risk will be determined on a case by case basis and secured by the imposition of planning conditions or other legally binding mechanisms, as appropriate. 8.4.24. Where proposals rely on existing flood defence infrastructure or require upgrades to existing or the installation of new infrastructure to facilitate development, sufficient detail and evidence shall be provided as part of the application for the Council to determine the adequacy of the intended measures. Evidence of the condition and longevity of existing defences; how any upgrade of existing or installation of new defences will be secured; and the mechanism by which such defences will be maintained over the lifetime of the development and by whom will also be required, as appropriate. 8.4.25. The Council will prioritise the maintenance, improvement or replacement of flood defence infrastructure over other land uses where relevant, inclusive of any strategic upgrade to the tidal flood defences under the Thames Estuary 2100 Plan. Development that would harm the effectiveness of existing flood defences or prejudice their maintenance and management due to proximity or other factors will not be permitted.	
Policy FW-4: Managing Waste Water Drainage Shortened Policy	8.5.11. A presumption will be applied that all new developments requiring discharge of waste water should do so to a public sewer to be treated at a public treatment works operated by a water company, unless it is not feasible to do so on grounds of cost or practicality.	Chapter 14 Road Drainage and Water Environment of the ES (Application Document 6.1) addresses the matter of road drainage and the water environment. Various documents have been produced in support of the ES in this regard:

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	Where alternative means of dealing with waste water are proposed, this will only be permitted where: • Supporting evidence has been provided, and it has been demonstrated that connection to a public sewer is not feasible on the above grounds • The application is accompanied by proportionate evidence on potential adverse impacts on the water environment, prepared by a suitably qualified person • There are no unacceptable adverse impacts on the water environment, amenity or the highway network • It has been demonstrated that a mechanism will be put in place to secure the maintenance of the waste water infrastructure for the lifetime of the development. 8.5.12. Major development proposals will be required to demonstrate at the application stage that there will be adequate waste water capacity to serve the development, or where development is being carried out in phases, the whole of the phase for which approval is being sought subject to said phasing being acceptable. 8.5.13. Where upgrades to waste water infrastructure are required to support the development, these should be detailed in a supporting statement accompanying a planning application along with any programme of phasing and the mechanism by which the infrastructure will be delivered in a timely manner and maintained for the lifetime of the development. 8.5.14. Planning permission will not be granted for applications that are unable to demonstrate adequacy of waste water capacity or how unacceptable waste water	• Water Features Survey (ES Appendix 14.2, Application Document 6.3) • Hydromorphology Assessment (ES Appendix 14.4, Application Document 6.3) • Hydrogeological Risk Assessment (ES Appendix 14.5, Application Document 6.3) A strategy for managing operational surface water drainage has been prepared centred on the application of Sustainable Drainage Systems (SuDS), appropriate to local conditions. The strategy is summarised in Part 7 of ES Appendix 14.6: Flood Risk Assessment (Application Document 6.3) in the ES. The drainage principles have been discussed and agreed with relevant Lead Local Flood Authorities (LLFAs), and the EA as detailed in Chapter 14 of the ES (Application Document 6.1). The overall conclusion of Chapter 14: Road Drainage and Water Environment of the ES (Application Document 6.1), taking into account the project design and mitigation set out in Section 14.5, is that there would be no likely significant adverse effects on water environment receptors Table 14.8). These matters are summarised in Chapter 6 of this Planning Statement.

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	infrastructure constraints will be overcome and infrastructure subsequently maintained.	
Policy FW-5: Managing Surface Water Drainage	8.6.8. The Council will require the use of sustainable drainage within developments, where this is appropriate. In the case of major developments, there will be a presumption that Sustainable Drainage Systems will be used to manage surface water run-off and alternatives will not be approved unless it is demonstrated, through the submission of evidence, that it is not feasible or inappropriate to do so. 8.6.9. Applications for major development should be supported by a Surface Water Strategy, detailing how the site will be drained in accordance with sustainable drainage principles or, where an alternative is proposed, the justification for the deviation from the policy requirement and details of the alternative scheme. 8.6.10. In all cases, the Council will require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use. In areas where there is evidence of existing surface water flooding issues, or these may result over time as a result of climate change, the Council will seek a lower rate of surface water run-off to reduce flood risk overall. 8.6.11. The Surface Water Strategy should be prepared in accordance with the requirements of the Kent County Council document - Drainage and Planning Policy Statement (June 2017 or as subsequently updated) and contain sufficient information for the Council (in consultation with the Lead Local Flood Authority) to assess the adequacy and appropriateness of the drainage scheme proposed.	See response to Policy FW-4 above.

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	8.6.12. Details of the arrangements to be put in place to ensure on-going maintenance of the drainage system for the lifetime of the development and the mechanism by which these will be secured should also be provided. 8.6.13. The Council will apply conditions to any grant of planning permission requiring the submission of a completion certificate prepared by a suitably qualified person to ensure that the Sustainable Drainage System has been fully implemented in accordance with the approved plans, as appropriate. 8.6.14. In designing Sustainable Drainage Systems, applicants will also be expected to show that they have considered opportunities to incorporate features to improve water quality, mitigate pollution, and enhance green infrastructure (including biodiversity) where it is appropriate to do so.	
Policy AM-1: Air Quality	10.1.9. Development proposals which may individually or cumulatively increase levels of air pollution in the Borough and/or are located in areas of poor air quality will be required to submit an air quality assessment. Such an assessment will be required to consider, as appropriate: • impacts upon areas with existing poor air quality • impacts upon the amenity and health and wellbeing of existing and future occupiers • adverse impacts upon the implementation of local and/or national air quality strategies and action plans • impacts on designated nature conservation sites, biodiversity and wildlife, along with appropriate avoidance and mitigation measures where impacts are likely to occur	Gravesham A2 AQMA lies partially within the Order Limits for the Project. Chapter 5 of the ES addresses the air quality impacts of the Project. It is supported by a Project Air Quality Action Plan (ES Appendix 5.6, Application Document 6.3). The selected alignment, approximately 200m from the village of Chalk, was chosen to balance air quality amongst various other environmental considerations. Route design has also been the subject of discussions with Gravesham Borough Council. Nonetheless, it is acknowledged that the Project would have significant air quality effects on a number of ecological sites. A number of alternative measures were considered to mitigate these impacts. However, in discussion with Natural England, it has been established

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	• breaches of EU and/or national legislation including that applicable to biodiversity and wildlife. 10.1.10. All major developments likely to result in unacceptable air quality impacts will require an emissions mitigation assessment. These assessments should be carried out by a suitably qualified air quality consultant in accordance with the latest guidance. Where development has the potential to worsen air quality either alone or in combination with other proposals, it will only be permitted if appropriate mitigation measures can be implemented to ensure that there is no unacceptable deterioration in air quality, having regard to the sensitivity of affected receptors and it will not prevent air quality objectives being met in a timely manner. 10.1.11. Where unacceptable adverse impacts are identified and where such impacts cannot be adequately mitigated development proposals will not be permitted.	that avoidance and mitigation will not be sufficient to fully address air quality impacts and a suite of compensatory measures are proposed focusing on large areas of new planting.
Policy AM-2: Contaminated Land	10.2.6. Proposals for development on land known to be or likely to be contaminated or affected by other contaminated land will only be permitted where such proposals are accompanied by a contaminated land assessment and, if necessary, a remediation strategy, which shows how the land will be remediated to an acceptable standard suitable for the proposed use and prior to its occupation. 10.2.7. Contaminated land assessments and remediation strategies should be produced ensuring best practice and industry standards are followed, such as the Model Procedures for the Management of Land Contamination – Contaminated Land Report 11 or any subsequent best practice guidance.	Chapter 10 of the ES deals with Geology and Soils (Application Document 6.1) and is supported by a number of detailed studies considering the geology, land stability, contamination and associated issues. ES Appendix 10.6 (Application Document 6.3) is a Preliminary Risk Assessment Report which summarises potential land quality issues along the Project route (incorporating an appropriate buffer). It sets out a Conceptual Site Model for contamination risks identifying potential sources, pathways and receptors. 207 sites were identified as being at potential risk of contamination but only 8 of these were classed as being at a high level of risk. Only one of these was in Gravesham Borough. Namely, a former vehicle garage and petrol filling station (in use approximately 1972 to 2008) on the A2 Eastbound. However, as noted in ES

Policy	Policy guidance	Policy Assessment
		Chapter 10: Geology and Soils (Application Document 6,1), EA approved remediation works were carried out following demolition of the site between 2008 and 2011. All other potential sources of contamination and potential geological or land stability risk south of the Thames were identified in the various studies as being at the low risk level.
Policy AM-3: Light Pollution	10.3.15. Proposals involving the installation of outdoor artificial lighting should be accompanied by a report compiled by a suitably qualified person setting out the need for the lighting in that location commensurate with the proposed use, its design and form, lighting level and duration of illumination together with an assessment of potential impacts (as appropriate) in terms of: • The amenity of existing and future occupiers likely to be affected by the scheme, both surrounding and within the application site • Highway safety and navigational safety on the River Thames • The historic environment • Landscape, with particular attention given to the Kent Downs AoNB and its setting • Biodiversity with particular attention given to international, national and locally designated sites as appropriate - The visibility and appreciation of the night sky and the conservation and enhancement of dark skies. 10.3.16. The evidence submitted in support of any proposal should be proportionate to the scale of the scheme and potential impact. The design of any such	With regards to lighting during construction, as required by the CoCP (Application Document 6.3), the Contractors would assess the required lux level to ensure visual intrusion and light spillage are kept to a minimum, particularly in close proximity to residential properties and busy roads where it may cause nuisance or distraction. Where necessary, the Contractors would provide lighting to site boundaries to ensure the safety of passing pedestrians. Specific measures such as vertical lighting would be employed near or on the River Thames to mitigate potential impacts on wildlife and marine traffic. The relevant best practice measures in relation to both lighting and dust are incorporated within the REAC and would be legally secured through DCO Requirement 4. With regards to the operational phase, all highway areas from the South Portal to the southern end of the Project would be lit. The project wide lighting design is described within Chapter 5 of this Planning Statement (which refers to ES Chapter 2: Project Description (Application Document 6.1). Lighting would be designed, positioned and directed to prevent or minimise light disturbance to nearby residents, ecological receptors, as well as motorists and rail and marine operations. This provision will apply particularly

Policy	Policy guidance	Policy Assessment
	lighting schemes should seek to minimise energy consumption commensurate with the objective of minimising environmental impacts such as skyglow, glare and light intrusion. 10.3.17. Where located in the Green Belt and comprising inappropriate development under national policy, any such proposal shall be accompanied by a statement setting out those very special circumstances considered to outweigh harm through inappropriateness and any other harm 10.3.18. Where located in the Kent Downs AoNB, harm caused by artificial lighting within its area and setting will be accorded great weight commensurate with the statutory objective of conserving or enhancing the natural beauty of such areas. 10.3.19. Proposals involving the installation of outdoor artificial lighting will only be permitted where no unacceptable adverse impacts will occur on the amenity of existing and future occupiers; highway safety and navigational safety on the River Thames; the historic environment; landscape; biodiversity; or the visibility and appreciation of the night sky, unless otherwise justified as an exception.	to sites where night working or security lighting would be required.
Policy AM-5: Noise and Vibration	10.5.9. Proposals for development generating noise and/or vibration that may impact upon sensitive receptors or be impacted on by existing or potential sources of noise and/or vibration must be supported by a noise/vibration assessment prepared by a suitably qualified person in accordance with best practice. 10.5.10. The assessment will be required to demonstrate in full that either the noise and/or vibration impacts are acceptable without mitigation or how impacts will be	Chapter 12 of the ES (Application Document 6.1) presents an assessment of the impacts of the Project on noise and vibration. These impacts are summarised in Chapter 6 of this Planning Statement. A number of potential sensitive receptors are identified in the borough. Section 12.5 of ES Chapter 12: Noise and Vibration (Application Document 6.1) describes the project design and mitigation measures, including measures which are

Policy	Policy guidance	Policy Assessment
	mitigated through design or other means to make them acceptable and how those measures will be delivered. 10.5.11. Planning permission will only be granted where: • In the case of development that may generate noise or vibration, that resulting impacts on sensitive receptors due to noise and/or vibration are acceptable both during the construction and operational phases of the development and in combination with other sources of noise and/or vibration • In the case of the introduction of a sensitive receptor into an area already subject to noise or vibration, that this is unlikely to result in a complaint or the curtailing of existing lawful activity causing that noise or vibration and that a high standard of amenity for existing/future occupiers of the proposed development can be achieved.	specific to the Kent section of the project. In addition to measures embedded into the scheme design including its alignment to avoid adverse impacts to the village of Chalk, these include undertaking many activities associated with tunnel boring at the South Portal below ground level, the creation of earth bunds and false cuttings and the installation of acoustic fencing. Even accounting for this mitigation there is one sensitive receptor (CN15 off Thong Lane) in Gravesham Borough which would experience short term moderate or greater adverse noise impact. However, for the reasons given in Chapter 6 of this Planning Statement, this would not constitute a significant effect.
Policy HER-1: Development involving Heritage Assets	12.1.16. Proposals which protect, conserve and enhance the historic environment of the borough and the contribution it makes to local distinctiveness and sense of place will be supported. Encouragement will also be given to proposals that make sensitive use of historic assets through regeneration and re-use, particularly where these bring redundant or underused assets back into an appropriate use. Proposals involving enabling development which conflict with policy will be required to demonstrate that it is reasonably necessary to secure the future conservation of the heritage asset and that this outweighs the dis-benefits of departing from policy. 12.1.17. Development will be expected to conserve and enhance or reveal the significance of designated heritage	ES Chapter 6: Cultural Heritage (Application Document 6.1) considers the potential impacts of the Project on cultural heritage. It identifies the heritage assets and archaeological features within and beyond 1km of the Order Limits including: • listed buildings • scheduled ancient monuments • conservation areas • designated and non-designated archaeological sites Chapter 6 of this Planning Statement describes the heritage assets which may be impacted by the Project. Taking into account mitigating measures and actions, both temporary and permanent impacts are identified

Policy	Policy guidance	Policy Assessment
	assets and the contribution made to that significance by their settings. Development will not be permitted where it is likely to cause substantial harm to the significance of designated heritage assets, either directly or indirectly through development within their settings, unless it is necessary to achieve substantial public benefit that would outweigh the harm or loss, or all of the following apply: • The nature of the heritage asset prevents all reasonable uses of the site • No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation • Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible • The harm or loss is outweighed by the benefit of bringing the site back into use. 12.1.18. Where a development will lead to less than substantial harm to the significance of a designated heritage asset, any harm will be weighed against the public benefits of the proposal, including securing its optimum viable use. 12.1.19. The effect of an application on the significance of a non-designated heritage asset will be a material consideration in its determination. Those that affect the significance of non-designated heritage assets will be carefully considered, and a balanced judgment made having regard to the scale of any harm or loss and the significance of the asset involved. Proposals which, on balance, have an unacceptable impact will not be permitted.	during both the construction and operational phases on a small number of heritage assets including Thong Conservation area. However, in accordance with paragraph 5.133 of the NPSNN, the need for the project as described in Application Document 7.1 and the wide-ranging public benefits it would deliver (Application Document 7.20) are considered wholly exceptional and necessary sufficient to constitute a compelling case in favour of the Project which overrides the acknowledged harm to the historic environment.

Policy	Policy guidance	Policy Assessment
	12.1.20. Any application affecting directly or indirectly the significance of a designated or non- designated heritage asset should be prepared in sufficient detail to enable the Council to evaluate the impact of the proposal on that asset. A Heritage Statement will also be required in support of such applications to outline and provide evidence as to the significance of the heritage asset, the contribution made by its setting, and the likely impact of the development upon it and any alternatives considered that may impact lesser upon its significance. In determining applications, the Council will accord additional weight as appropriate where multiple heritage assets stand to be adversely affected. 12.1.21. Should permission be granted for the removal of part or all of a heritage asset, this will not be allowed to proceed until such time as a mechanism is put in place to ensure that any approved replacement development will proceed. Where permission is granted for such development, conditions will be attached requiring photographic or other recording of the asset to be removed with a report containing said information to be submitted to the Council as a public record.	

Policy	Policy guidance	Policy Assessment
Policy HER-4: Archaeology	12.1.29. The archaeological and historic integrity of designated heritage assets and other important archaeological sites, together with the contribution made toward their significance by their settings, will be protected and, where possible, enhanced. 12.1.30. Planning applications on sites where there is or is potential archaeological interest must be supported by an informed assessment of the asset and the impact of the proposal on its significance. 12.1.31. Where important or potentially significant archaeological heritage assets may exist, developers may be required to arrange for field evaluations to be carried out in advance of the determination of planning applications in accordance with a specification to be agreed in writing with the Council. 12.1.32. Where the case for development affecting a heritage asset of archaeological interest is accepted, a decision will be made on its treatment weighing the significance of the asset against the public benefits of the proposal. Where the heritage asset is of demonstrably equivalent significance to a Scheduled Monument, any potential harm to that significance shall be evaluated on the same basis as if it were a designated heritage asset. 12.1.33. Where preservation in situ is not possible or justified, appropriate provision for preservation by record will be required. In such cases, a copy of the report detailing and interpreting findings shall be deposited with the Council and the County Historic Environment Record.	See response to Policy HER-1 above.

C.2.2 This Plan contains a number of proposed allocations which abut the Project Order Limits. These are:

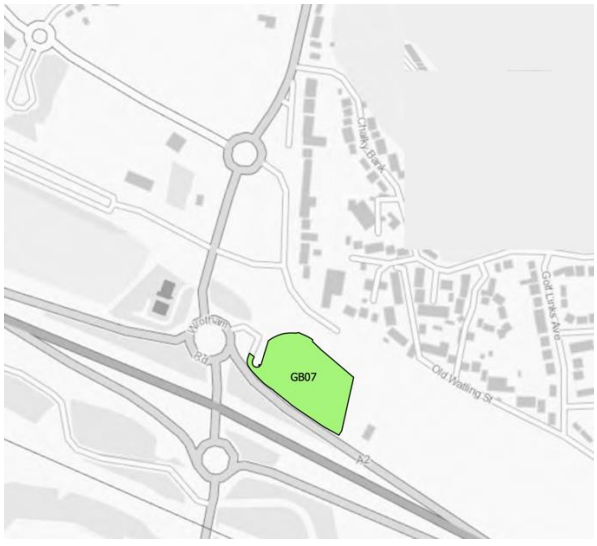
a. GB07 Former Tollgate Hotel, Gravesend
b. GB150 Recreation Ground at Mackenzie Way, Gravesend
c. GBS-K Land to the north, east and west of Three Crutches (A2/M2 junction)
d. GBS-R Cascades Leisure Centre, Thong Lane, Shorne

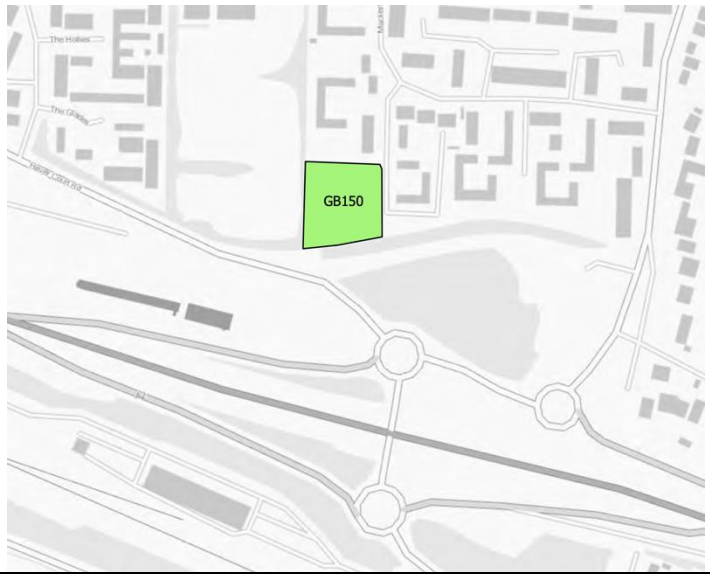
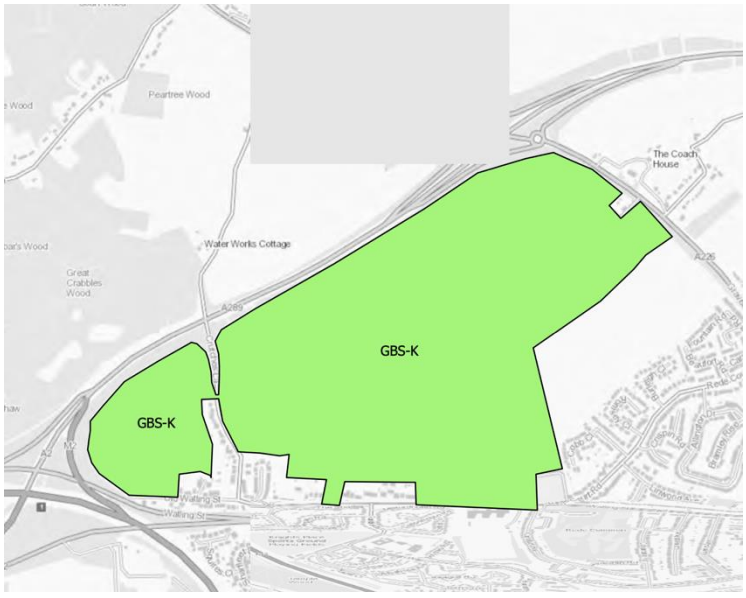
C.2.3 Whilst they are adjacent to the Project Order Limits, all lie beyond the Project Order Limits

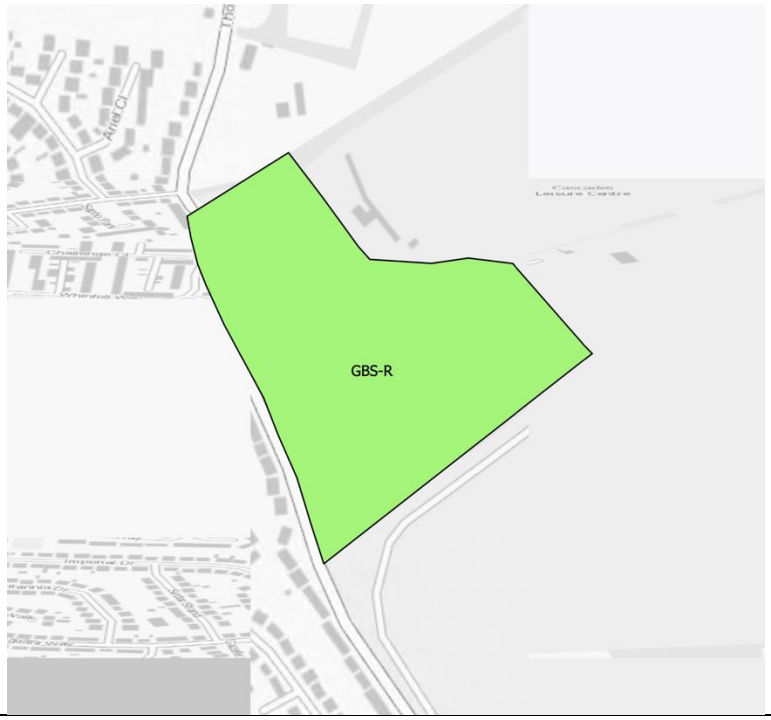
C.2.4 Furthermore, Figure 14 of the Plan notes:

"Land to the east of Gravesend has the potential to accommodate 800 dwellings, however the land is unlikely to be available during the plan period due to it being required for the construction of the Lower Thames Crossing and mitigation once the Lower Thames Crossing is open. To address this, the land between Thong Lane and the alignment of the Lower Thames Crossing will be safeguarded for development beyond 2030 and a future Local Plan."

Table C.8 Gravesham Local Plan regulation 18 Stage 2 Consultation: Part 1 Local Plan core strategy partial review and site allocations October 2020

Policy	Policy Guidance	Policy Assessment
GB07	**Former Tollgate Hotel, Gravesend** Identified as a potential allocation for commercial use. Developable area 1ha gross. 	This site is adjacent to the Project Order Limits

Policy	Policy Guidance	Policy Assessment
GB150	**Recreation Ground at Mackenzie Way**, Gravesend Identified as a potential development site for 15 dwellings (0.43ha) 	This site is adjacent to the Project Order Limits.
GBS-K	**Land to the north,** east and west of Three Crutches (north of A2/M2 junction) Identified as a potential allocation for 1,385 dwellings and commercial on 46.23ha 	The westernmost boundary of this site is adjacent to the Project Order Limits.
GBS-R	**Cascades Leisure Centre, Thong Lane, Shorne** Identified as a potential housing site with a yield of 170 dwellings on an area of 5.61ha	This site is adjacent to the Project Order Limits. The extent of the Project Order Limits includes part of the golf centre par 3 golf course but

Policy	Policy Guidance	Policy Assessment
		excludes the Cascades Leisure Centre. The Applicant proposes to provide replacement land for the par 3 golf course.
Figure 14	Figure 14 below illustrates how the Borough's development requirements could be accommodated within the Borough when taking into account existing constraints i.e. biodiversity, heritage, AONB, the strategic role of the Green Belt and sustainability i.e. access to public transport and local services. For the east of the Borough, i.e. land at Chapter Farm development would utilise transport and local services in Medway. Land to the east of Gravesend has the potential to accommodate 800 dwellings, however the land is unlikely to be available during the plan period due to it being required for the construction of the Lower Thames Crossing and mitigation once the Lower Thames Crossing is open. To address this, the land between Thong Lane and the alignment of the Lower Thames Crossing will be safeguarded for development beyond 2030 and a future Local Plan.	

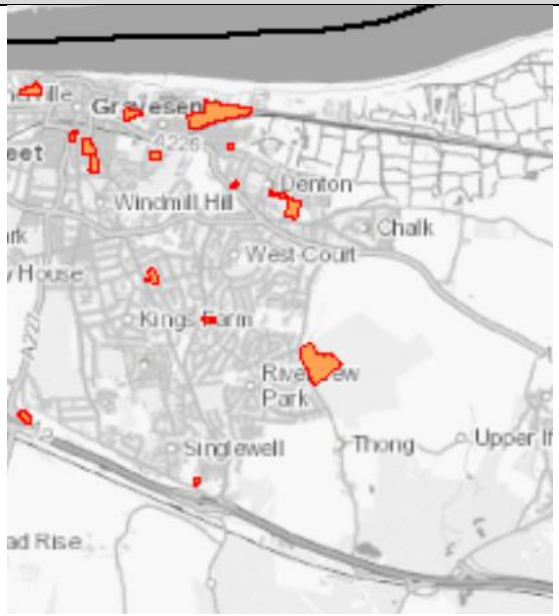
Policy	Policy Guidance	Policy Assessment
	 See also Map here	

Table C.9 Kent Minerals and Waste Local Plan (2013-2030) Adopted September 2020

Policy	Policy guidance	Policy assessment
Policy CSM 1: Sustainable Development Shortened Policy	When considering mineral development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and the associated Planning Practice Guidance. Mineral development that accords with the development plan will be approved without delay unless material considerations indicate otherwise.	A Mineral Safeguarding Assessment Report (ES Appendix 11.2, Application Document 6.3) has been prepared to assess whether the Project route would sterilise the mineral resource capacity within defined Mineral Safeguarding Areas (MSAs) and, if so, whether removal prior to development is warranted. There are no proposals to extract mineral resources from MSAs in Kent as this is likely to result in an adverse impact from a potential mineral site on an adjoining Ramsar site. Elsewhere, works are of a temporary nature and permanent sterilisation would not occur.
Policy CSM 5: Land-won Mineral Safeguarding	Economic mineral resources are safeguarded from being unnecessarily sterilized by other development by the identification of: • Mineral Safeguarding Areas for the areas of brickearth, sharp sand and gravel, soft sand (including silica sand), ragstone and building stone as defined on the Mineral Safeguarding Area Policies Maps in Chapter 9 • Mineral Consultation Areas which cover the same area as the Minerals Safeguarding Areas and a separate area adjacent to the Strategic Site for Minerals at Medway Works, Holborough as shown in Figure 17 • Sites for mineral working within the plan period identified in Appendix C and in the Mineral Sites Plan	As noted above, a Mineral Safeguarding Assessment Report (ES Appendix 11.2, Application Document 6.3) has been prepared to assess whether the Project route would sterilise the mineral resource capacity within defined Mineral Safeguarding Areas (MSAs) and, if so, whether removal prior to development is warranted. There are no proposals to extract mineral resources from MSAs in Kent as this is likely to result in an adverse impact from a potential mineral site on an adjoining Ramsar site. Elsewhere, works are of a temporary nature and permanent sterilisation would not occur.

Policy	Policy guidance	Policy assessment
Policy CSW 2: Waste Hierarchy	To deliver sustainable waste management solutions for Kent, proposals for waste management must demonstrate how the proposal will help drive waste to ascend the Waste Hierarchy whenever possible.	The Project has demonstrated the implementation of the waste hierarchy as described within Chapter 11 of the ES Chapter 11: Material Assets and Waste (Application Document 6.1) and ES Appendix 11.5: Waste Assessment Supporting Data (Application Document 6.3) as follows: • Elimination: Section 11.5 of Chapter 11 outlines how the volume of waste generated has been reduced in design. • Reuse/Recycling: Table 2.1 of Appendix 11.1 (Application Document 6.3) shows how the Project would divert more than 70% of waste from landfill. • Section 11.6 of Chapter 11 demonstrates an acceptable impact to the local recycling/recovery facility capacity. • Disposal: Section 11.6 of Chapter 11 shows the waste generated during the construction phase (which is assumed to be sent for disposal in landfill), is likely represent less than 1% of the landfill capacity in England for all waste types (non-hazardous, inert and hazardous waste). The waste generated during the construction phase are reported in ES Chapter 11 Materials Table 11.12 (Application Document 6.1). • There is one hazardous landfill which accepts asbestos waste along with other hazardous wastes within the study area. Should the hazardous waste generated by the Project require landfill disposal it would likely be managed outside the study area.

Policy CSW 3: Waste Reduction	All new development should minimise the production of construction, demolitions and excavation waste and manage any waste in accordance with the objectives of Policy CSW 2. The following details shall be submitted with the planning application, except for householder applications: • the measures to be taken to show compliance with this policy • the details of the nature and quantity of any construction, demolition and excavation waste and its subsequent management New development should include detailed consideration of waste arising from the occupation of the development including consideration of how waste will be stored, collected and managed. In particular proposals should ensure that: • there is adequate temporary storage space for waste generate by that development allowing for the separate storage of recyclable materials • as necessary, there is adequate communal storage for waste, including separate recyclables, pending its collection • storage and collection systems (e.g. any dedicated rooms, storage areas and chutes or underground waste collection systems), for waste are of high quality design and are incorporated in a manner which will ensure there is adequate and convenient access for users and waste collection operatives and will contribute to the achievement of waste management targets • adequate contingency measures are in place to manage any mechanical breakdowns. All relevant proposals should be accompanied by a recycling and waste management strategy which considers	ES Chapter 11: Material Assets and Waste (Application Document 6.1) describes how the Project would manage waste including waste reduction, with details provided on: • The anticipated waste arrangements proposed for construction and operation including proposed mitigation measures to reduce the volume of waste produced and sent for disposal. • Onsite and offsite waste management arrangements, targets and contractor performance. • The volumes of hazardous and non-hazardous waste arising from construction and operation forecast compared with the local, regional and national waste infrastructure capacity. • An evaluation of available recovery and disposal sites against a suite of sustainability criteria demonstrating that sufficient capacity exists within the existing regional waste infrastructure. • An outline of how construction waste would be recovered in line with the requirement of the Waste Management Plan for England (WMPE) and the forecast percentage of waste estimated to be diverted from landfill. • An outline of how circular economy principles have been applied throughout the Project to manage resource use and reduce waste.

Policy	Policy guidance	Policy assessment
	the above matters and demonstrates the ability to meet local authority waste management targets.	
Policy CSW 11: Permanent Deposit of Inert Waste	Planning permission for the disposal of inert waste will be granted where: • it can be demonstrated that the waste cannot be managed in accordance with the objectives of Policy CSW2 • it is for the restoration of landfill sites and mineral workings • environmental benefits will result from the development, in particular the creation of priority habitat • sufficient material is available to restore the site within agreed timescales.	An assessment undertaken within Chapter 11: Material Assets and Waste of the ES (Application Document 6.1) shows that of the total waste arisings from the Project, 82% would be subject to diversion from landfill, complying with the legal minimum diversion rate of 70% from the Waste Framework Directive. Material use and waste generation is expected during both construction and operation of the Project, with estimated waste generated considerably more during the construction phase. Design mitigation includes identifying, securing and using materials onsite, reducing the need to import fill materials. Estimates of materials to be generated onsite and used during construction are presented in Appendix 11.1 of the ES (Application Document 6.3). Contractors would be required to produce a Site Waste Management Plan (SWMP) or equivalent to set out the procedures for the characterisation, management and monitoring of waste arisings and to ensure the waste hierarchy is implemented with opportunities to reduce waste generation or improve recovery/ recycled rates. This would be secured in the Code of Construction Practice (CoCP) (ES Appendix 2.2, Application Document 6.3). An Excavated Materials Assessment: Appendix 11.1 of the ES (Application Document 6.3) has been undertaken to demonstrate that sufficient capacity exists in the region to support recovery and diversion from landfill. A number of facilities with void capacity for inert waste have been identified in the study area.

Policy	Policy guidance	Policy assessment
		Proposed landscape enhancements have been developed for the Project in accordance with the spatial layout of features identified in the Environmental Masterplan (ES Figure 2.4, Application Document 6.2), and include a large number of measures to deliver environmental benefits as presented in Tables 5.1, 5.2 and 5.3 of Application Document 7.5: Design Principles.
Policy DM 7: Safeguarding Mineral Resources	Planning permission will only be granted for non-mineral development that is incompatible with minerals safeguarding, where it is demonstrated that either: • the mineral is not of economic value or does not exist • that extraction of the mineral would not be viable or practicable • the mineral can be extracted satisfactorily, having regard to Policy DM9, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development • the incompatible development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed • material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction • it constitutes development that is exempt from mineral safeguarding policy, namely householder	A Mineral Safeguarding Assessment Report: Appendix 11.2 of the ES (Application Document 6.3) has been prepared to assess whether the proposed Project route alignment would sterilise the mineral resource capacity within defined Mineral Safeguarding Areas (MSAs) and, if so, whether removal prior to development is warranted. There are no proposals to extract mineral resources from Mineral Safeguarding Areas (MSAs) in Kent as this is likely to result in an adverse impact from a potential mineral site on an adjoining Ramsar site. Elsewhere, works are of a temporary nature and permanent sterilisation would not occur.

Policy	Policy guidance	Policy assessment
	applications, infill development of a minor nature in existing built up areas, advertisement applications, reserved matters applications, minor extensions and changes of use of buildings, minor works, non-material amendments to current planning permissions • it constitutes development on a site allocated in the adopted development plan Further guidance on the application of this policy will be included in a Supplementary Planning Document.	
Policy DM 9: Prior Extraction of Minerals in Advance of Surface Development	8. Planning permission for, or incorporating, mineral extraction in advance of development will be granted where the resources would otherwise be permanently sterilised provided that: 9. the mineral extraction operations are only for a temporary period; and, 10. the proposal will not cause unacceptable adverse impacts to the environment or communities Where planning permission is granted for the prior extraction of minerals, conditions will be imposed to ensure that the site can be adequately restored to a satisfactory after-use should the main development be delayed or not implemented.	A Mineral Safeguarding Assessment Report: ES Appendix 11.2 (Application Documents 6.3) has been prepared to assess whether the proposed Project route alignment would sterilise the mineral resource capacity within defined Mineral Safeguarding Areas (MSAs) and, if so, whether removal prior to development is warranted. There are no proposals to extract mineral resources from MSAs in Kent as this is likely to result in an adverse impact from a potential mineral site on an adjoining Ramsar site. Elsewhere, works are of a temporary nature and permanent sterilisation would not occur. Any temporary construction by reason of its temporary nature would not result in permanent sterilisation of minerals.

Table C.10 Kent Local Transport Plan 4: 2016-2031

Policy	Policy guidance	Policy assessment
Outcome 1: Economic growth and minimised congestion	Deliver resilient transport infrastructure and schemes that reduce congestion and improve journey time reliability to enable economic growth and appropriate development, meeting demand from a growing population.	The Project would provide over 80% additional road capacity across the River Thames to the east of London, linking with the A2 in the south and the M25 in the north and providing increased cross river resilience and improved safety. The Project would also benefit leisure and business travellers by providing quicker, more reliable journey times locally, regionally and nationally. The Transport Assessment (Application Document 7.9) sets out the benefits of the Project in terms of improving the operation of the strategic road network (SRN) directly connected to the Project and providing additional highways capacity. Specifically, the Project is forecast to reduce traffic on the Dartford Crossing by an average of 19% in the 2030 opening year and improve journey times from around 12 to just over seven minutes in the AM peak on the Dartford Crossing (between junctions 2 and 31), reducing congestion on this part of the strategic road network. The Project would support sustainable local development and regional economic growth in the medium to long term by providing improved journey times for freight travelling to and from Dover.
Outcome 3: Safer Travel	Provide a safer road, footway and cycleway network to reduce the likelihood of casualties and encourage other transport providers to improve safety on their networks.	The Transport Assessment (Application Document 7.9) identifies those links which are forecast to experience a change greater than 5% in the accident rate in the 2030 opening year, of which two are within Kent: • The assessment has also forecast changes in accident rates as a result of the Project in line with relevant guidance (Transport Analysis Guidance (TAG), Costs and Benefits Appraisal –

Policy	Policy guidance	Policy assessment
		Light Touch (COBALT)), which shows a forecast increase in traffic accidents when the Project is operational. • However, it is important to note that these increases are a reflection of the significant forecast increase in the total traffic flows across the River Thames; the number of traffic accidents per vehicle kilometre travelled would decrease. See section 9.3 of the TA (Application Document 7.9). Proposals for footway and cycleway provision as part of the Project are referred to below in response to Outcome 5.
Outcome 4: Enhanced environment	Deliver schemes to reduce the environmental footprint of transport, and enhance the historic and natural environment.	Paragraph 3.5 of the NPSNN notes that the impacts of road development on aggregate levels of emissions is likely to be very small and need to be seen in the context of the significant projected reductions in carbon emissions as a result of current and future policies to meet Government's legally-binding carbon budgets. Chapter 15 of the Environmental Statement (Application Document 6,1) assesses the potential 'worst case scenario' impacts of the Project on Greenhouse Gas Emissions and climate change. It is supported by a Carbon and Energy Plan (Application Document 7.19). This Plan quantifies the likely carbon emissions generated by the project and methods for reducing them and sets out how the Project would contribute to the UK's net zero carbon goal. It shows how the Applicant has acted to reduce emissions by including mitigation measures embedded in the preliminary design and by embedding carbon reductions in the construction stage through the procurement process to ensure that the Contractors

Policy	Policy guidance	Policy assessment
		are contractually bound to comply with relevant commitments made as part of this application. These measures and an explanation of how they would be secured through the REAC (Section 7 of the CoCP, Application Document 6.3) are set out in Section 3 of the Carbon & Energy Plan. Chapter 15 Climate of the ES (Application Document 6.1) identifies that, when GHG emissions from the Project would be at their highest, most intense level (short-term construction activity), the Project would contribute no more than 0.06% of total emissions in any five-year carbon budget during which they arise. Accordingly, it is concluded that the GHG impact of the Project would not have a material impact on carbon reduction targets as set by the UK Government and is therefore not significant. In terms of the historic environment ES Appendix 6.10 (Application Document 6.3) provides a full assessment of the likely significant heritage impacts of the Project. The ES concludes that the Project would have construction and operational effects on archaeological remains, built heritage, historic landscapes and the paleoenvironmental and geoarchaeological resource. Mitigation has been proposed to avoid, reduce or compensate for adverse impacts to heritage assets. The Assessment of effects on cultural heritage has identified substantial harm to heritage assets however this would be outweighed by the public benefits of the Project, as set out in detail in the Need for the Project (Application Document 7.1). In terms of the natural environment ES Chapter 8: Terrestrial Biodiversity and ES Chapter 9: Marine Biodiversity of the ES (Application Document 6.1)

Policy	Policy guidance	Policy assessment
		address the anticipated impacts of the Project on terrestrial and marine biodiversity respectively. The overarching conclusion is that, while there would be acknowledged impacts, when taking into account the range of environmental commitments included as part of the DCO application and the proposed development design, mitigation and compensation measures, these would minimise impacts upon biodiversity and would deliver significant benefits in the longer term, in accordance with the NPSNN.
Outcome 5: Better health and wellbeing	Provide and promote active travel choices for all members of the community to encourage good health and wellbeing and implement measures to improve local air quality.	Footbridges, green bridges and underpasses would be accessible to all users, including those using wheelchairs, and would be designed taking into account the safety needs of vulnerable users (for example bridges would have rails at appropriate heights for users with mobility issues, and would include appropriate lighting to ensure maximum safety and security). The Project makes significant new provision for walkers, cyclists and horse riders (WCH) of over 30km of new footpaths, bridleways and shared use tracks. These new facilities would also help improve connectivity and increase opportunities for active travel and levels of physical activity. An active modes appraisal has been undertaken as part of Appendix D of the Combined Modelling and Appraisal Report (ComMA) (Application Document 7.7).
New Lower Thames Crossing	"We are clear that a new Lower Thames Crossing, to the east of Gravesend, is required to unlock growth, improve journey time reliability, improve network resilience, and enable opportunities for regeneration. In the 2016 consultation, our response was adamant that the Western Southern Link should be chosen and that with careful route alignment and tunnelling, the	Noted

Policy	Policy guidance	Policy assessment
	environmental and heritage impacts could be substantially minimised. As part of the project to deliver the new Lower Thames Crossing the A229 between M2 Junction 3 and M20 Junction 6 should be upgraded (what has previously been called Option C 'variant') along with improvements to the A249 and other links between the two motorways and the upgrades identified for 'bifurcation of port traffic' set out in the next section.	

Table C.11 Thurrock Core Strategy and Policies for Management of Development (as amended) Adopted January 2015

Policy	Policy guidance	Policy assessment
CSSP4: Sustainable Green Belt Shortened Policy	1. Balancing competing demands on the Thurrock Green Belt The Council's policy is to maintain the purpose, function and open character of the Green Belt in Thurrock in accordance with the provisions of PPG2 for the plan period. The Council will: I. Maintain the permanence of the boundaries of the Green Belt, excepting the proposed Urban Extension Broad Locations Identified in this policy, Policy CSSP 1 and as shown on the Proposals Map. II. Resist development where there would be any danger of coalescence. III. Maximise opportunities for increased public access, leisure and biodiversity. I. Opportunities for Leisure and Sport in the Green Belt i. The Council's policy is that the constructive and positive use of the Green Belt for sports and leisure purposes is an essential component of the Thurrock Spatial Strategy that will underpin the sustainable development and regeneration of Thurrock to the long-term benefit of local people. ii. The Council will actively encourage the pursuit of leisure and sports activities appropriate to the Green Belt by improving connectivity between Thurrock's Urban Areas and the Green Belt to promote this asset for the enjoyment and well being of Thurrock's communities. iii. In particular, the Council will support the development of Sports Hubs in Green Belt land at North East Grays and at Belhus (shown on the Key Diagram	The designated Green Belt accounts for approximately 60% of the Council's total land area. Appendix E of this Planning Statement assesses the planning issues raised by the location of the Project within the Green Belt, including that within Thurrock. The assessment acknowledges that the Project as a whole constitutes 'inappropriate' development, although notes that a number of component parts of the Project can be regarded as 'exceptions' and are not considered to be 'inappropriate' development. As the Project does not fall within the list of excepted uses within the Green Belt and is therefore considered to represent 'inappropriate' development. The 'very special circumstances' justifying the Project as 'inappropriate' development within the Green Belt have been set out, based on the following: • The defined and over-riding need for the Project • No viable alternatives • National Policy support Further details regarding the 'need' case for the Project, as a form of linear infrastructure is provided in a separate supporting document, the Need for the Project (Application Document 7.1). The Thurrock Greengrid Strategy has provided guidance in preparing the Green Infrastructure Study (Appendix H). The Study is a key document that has been used to inform the Project's landscape and design, plus incorporated into embedded and essential mitigation. The Project Design Report (Application Document 7.4) provides details of the design of the route

Policy	Policy guidance	Policy assessment
	and included in the Adopted Site-Specific Allocations and Policies DPD and identified on the Proposals Map). 4. Enhancing the Green Belt I. Sustainable Boundaries The Council will seek to reinforce the Green Belt boundary through structural enhancement of the local landscape features. The Council will secure structural landscape enhancements in accordance with Landscape Character Assessments and they will be delivered by developers as part of an overall contribution package linked to development schemes. II. Public access, open space and biodiversity The implementation of the Greengrid Strategy will form a critical component of the overall Green Belt strategy to retain open character, enhance public access and secure biodiversity within Green Belt. III. Sustainable Design and Construction Developers proposing schemes within the Green Belt will have to fully comply with the relevant Thematic and Development Management policies in this plan.	alignment and how this would integrate within the landscape. The Project would be designed to a high standard with measures taken to minimise any impacts as far as possible. Relevant design principles are set out below: • Ensuring that the Project minimises waste and the need for new materials. • Green bridges to increase biodiversity, greater ecological connectivity across urban regeneration sites, increase the quality and quantity of green and blue infrastructure and accessibility to green open spaces etc. • Design for structures that are multifunctional, resilient and sustainable, allowing for future adaptation and technical requirements. • To make beneficial reuse of excavated materials on site. The Code of Construction Practice (CoCP) (ES Appendix 2.2, Application Document 6.3) requires that energy consumption and materials use are recorded on an ongoing basis during the Project's construction phase. A further carbon assessment, including greenhouse gas (GHG) emissions, would be undertaken post-construction. In terms of enhancements within the Green Belt, four green bridges within Thurrock are designed to be multi-functional; reducing severance for ecology, providing a better experience for walkers, cyclists and horse-riders (WCH) and helping to mitigate the Project's impacts on the landscape character of the Green Belt.
CSSP5: Sustainable	It is the policy of the Council and its Partners to:	A Green Infrastructure Study (Appendix H to this Statement) commissioned for the Project sets out the

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Greengrid Shortened policy	1. Deliver the Greengrid Strategy as part of the Thurrock Core Strategy Infrastructure Prioritisation and Implementation Plan and the Adopted Statutory Development Plan I. Ensure that all development proposals take account of the objectives of the Greengrid network and where appropriate contribute to the management and enhancement of the Greengrid. II. Deliver the area based Greengrid Improvement Zones to ensure that the location, planning, design and ongoing management of sites is appropriate, and that opportunities are sought to make best use of land and green infrastructure assets in delivering ecosystem services. III. Set out guidance for the delivery of Thurrock Greengrid in the Thurrock Greengrid Supplementary Planning Document. IV. Ensure the Thurrock Greengrid is delivered by Developer Contributions as necessary. V. Provide opportunities for skills development, education and public awareness-raising on the value and importance of the Greengrid. 2. The Greengrid will be delivered at a spatial level through a series of 8 Greengrid Improvement Zones. The Improvement Zones are listed below: i. Aveley and South Ockendon (Including Thames Chase) ii. Mardyke Valley iii. West Thurrock/Lakeside/Chafford iv. Purfleet v. North Grays & Chadwell St Mary vi. Grays Riverside/ Tilbury	‘bigger picture’ for the delivery of large-scale Green Infrastructure focusing, ‘on land that is to be safeguarded, managed or secured in positive ways to create a multifunctional network of green spaces and assets for which investment can deliver the greatest range of sustainable benefits.’ The Study is a key document that has been used to inform the Project’s landscape and design. The Thurrock Greengrid Strategy has provided relevant guidance in preparing the Green Infrastructure Study. ES Figure 2.4: Environmental Masterplan (Application Document 6.2) identifies the embedded environmental mitigation measures for the Project including proposals affecting the functionality and connectivity of the Green Infrastructure network within Thurrock. The following open space site and two areas of common land would be permanently impacted by the Project. These sites are not considered surplus to requirements and are proposed to be replaced in accordance with the NPSNN. • Tilbury Green Common Land • Ron Evans Memorial Field • Orsett Fen Common Land The proposed replacement open space and areas of common land are located within the vicinity of land which is to be lost as a result of the Project and will be no less advantageous to users both in terms of its equivalent size, quality and its location. Further details on open space (and replacement land) are provided in Appendix D and Chapter 8 of this Planning Statement and in the Statement of Reasons (Application Document 4.1).

Policy	Policy guidance	Policy assessment
	vii. East Thurrock / Rural Riverside viii. Stanford-le-hope/ Corringham/ Horndon/ Langdon Hills Across the borough, considerations will include: • Semi-natural green space • Multifunctional greenspace • Promotion and safeguarding of biodiversity and geodiversity • Urban and rural trees and woodlands • Historic Environment and Heritage assets • Ecosystem services opportunities • Strategic links and bridging points • Flood Risk and water management • Mitigation of and adaptation to effects of climate change through the use of natural systems and green infrastructure assets • Strategic views • Broad landscape management areas 3. Develop and protect Local Scale Assets The Council will promote and protect Local-scale assets including any Local Green Spaces identified in local plans or neighbourhood plans that contribute to Thurrock's sustainable Greengrid including: • Doorstep sites, play areas, amenity open spaces and allotments, which are often local sites within urban areas and villages and the first link to the wider setting • Local green links, which provide vital routes for people to access local sites and the wider Rights of Way and Safe Routes to School network	The Project will be accessible to all, particularly through improved connectivity and accessibility for walkers, cyclists and horse riders (WCH) via the creation of new and improved Public Rights of Way (PRoW). Chapter 13: Population and Human Health of the ES (Application Document 6.1) states that PRoW, bridleways and cycle routes will be re-linked. Within Thurrock, the creation of the Mardyke wetland and WCH tracks within the area being improved will offer access to this fenland landscape from both the southern and western ends of the Ockendon Link. Also, the reconnection of historic severance links across the M25, with the proposed WCH bridge from Thames Chase Community Forest will rectify some of the historic severance caused by the M25 and increase access from the facilities at Thames Chase to recreational routes to the east of the M25. This will also help link open green spaces such as Thames Chase Forest Centre, Belhus Park, Little Belhus Park and the Mardyke Chapter 10: Geology and Soils of the ES (Application Document 6.1) has not identified any internationally or nationally designated sites of geological conservation within Thurrock.

Policy	Policy guidance	Policy assessment
	• Registered commons and villages and town greens • Biodiversity interests and local nature reserves, such as Linford Wood and Grove House Wood • Local productive land, including local allotments, community gardens and commercial small-holdings involved in supplying local food or craft resources. Development within Local Green Spaces will not be permitted unless there are very special circumstances. The Council envisages these circumstances will include where such development would support the functional value of such spaces without detracting from the visual qualities which the community may value. 5. Promote productive land and natural system opportunities The Council and Partners will promote productive land and natural systems opportunities (soils, bio and geo diversity), including: • current allotments • agricultural/rural lands • the potential for biomass cropping in the northeast of Thurrock • potential co-firing using biomass fuels in the Tilbury area • the potential use of the Thames Chase Community Forest area for sustainable management of wood fuel.	
CSTP3: Gypsies and Travellers	The Council will support proposals that seek to ensure that the standard of the existing approved Gypsy and Traveller sites in the Borough is progressively improved and upgraded.	The Project would involve demolition of the Gammonfields Travellers' site lies within the Order Limits. The residents of Gammon Fields have requested that the replacement traveller's site is located within the

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	6. Proposals for new or extensions to existing Gypsy and Traveller Sites will be considered by reference to the following criteria: (i) The Council is satisfied that there is a clearly established need for the site and the number of pitches involved cannot be met by an existing site (ii) The site is accessible by foot, cycle and/or public transport to local services and facilities, such as shops, primary and secondary schools, healthcare and other community facilities (iii) The site proposal will not unacceptably impact upon the safety and amenity of the occupants and neighbouring uses (iv) The site proposal will not unacceptably harm the character and appearance of the area and will not result in an unacceptable visual impact (v) The proposed accommodation on the site or site extension will not normally comprise more than 5 individual pitches. This threshold may be exceeded where the site location and topography allows always subject to the availability of credible evidence of actual need (vi) The site will have safe and convenient access to the road network and would not cause a significant hazard to other road users (vii) The site will make provision for parking, turning, service and emergency vehicles (viii) The site will be supplied with essential services such as water, power, sewerage and drainage, and waste disposal (ix) Proposals incorporate a landscape strategy where appropriate	surrounding area close to existing schools, healthcare and community facilities and has a similar pitch orientation. The proposed traveller's site is located east of the existing Gammonfields, area and accessible to existing facilities. The replacement traveller's site would have the same access off Long Lane or Gammonfields Way as at present with pedestrian access to public transport which runs along the A1013. The site would be designed to ensure safe access and egress onto the road network and is not located within the flood zone. The replacement site would have essential services provided before it is occupied. The replacement site is equivalent to the existing in terms of size, quality and access arrangements from Long Lane. The likely effect has therefore been assessed as neutral and not significant. The proposed replacement traveller's site lies to the east of the existing Gammonfields site, as shown on the Special Category Plans (Application Document 2.4). Within the Development Consent Order under Schedule 2 is a specific requirement for the detail design of the replacement Gammonfield site. Design Principles (Application Document 7.4), sets out the process and details required for the replacement Gammonfield Travellers' Site and the further engagement with the Gammonfield residents and Thurrock Council. The proposed design, layout, and appearance would be part of the detailed design, allowing for meaningful design and engagement by the detailed designer.

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	(x) The vulnerability of the proposed site to flood risk.	
CSTP15: Transport in Greater Thurrock Shortened Policy	In Greater Thurrock, accessibility, especially to work, education and healthcare, will be improved. To achieve this the Council and partners will: III. Prioritise Rights of Way/Bridleway improvements, such as the Mardyke Valley route, that contribute to the development of the Greengrid. IV. Develop local walking and cycle routes that link to the Thurrock urban area and that link the National Cycle Network Route 13 to employment. Access to London Gateway will be a priority. These local routes will also form an integral part of the Greengrid strategic and local green links. Wherever possible the design and route selection will assist to deliver biodiversity enhancement and habitat corridors. V. Support more sustainable and healthy travel patterns through school and workplace travel plans, particularly in South Ockendon and in accessing London Gateway. The latter should include improved public transport interchange at Stanford-le-Hope railway station and with SERT, to connect with local bus services to London Gateway.	Chapter 13: Population and Human Health of the ES (Application Document 6.1) has identified mitigation measures to address the adverse effects of the Project on existing routes and networks for walkers, cyclists and horse riders (WCH), both during construction and operation. The following opportunities are proposed within Thurrock: • Muckingford Road: Improved links from Linford and East Tilbury to Chadwell St Mary. • Stifford Clays Road: Incremental improvements to extend cycle routes between Orsett and William Edwards Academy. • A1013 and Rectory Road: Re-provide and improve commuter cycle routes along the A1013 between Stanford le Hope, Orsett and Little Thurrock. • Provide an equestrian standard link across the A13. • Fenland Access: Provide better WCH access to the fenland and Mardyke by connecting existing Public Rights of Way (PRoWs) and upgrading to new shared use tracks. • North Road: To mitigate the severance of informal off-road routes between North and South Ockendon by providing improved connections.
CSTP16: National and Regional Transport Networks Shortened Policy	The Council will work with partners to deliver improvements to national and regional transport networks to ensure growth does not result in routes being above capacity. Public transport improvements will be prioritised in order to achieve a	The Transport Assessment (Application Document 7.9) sets out the benefits of the Project in terms of improving the operation of the strategic road network (SRN) directly connected to the Project route and providing additional highway capacity. The Project is forecast to reduce traffic on the Dartford Crossing and

Policy	Policy guidance	Policy assessment
	modal shift. To achieve this the Council and partners will: IV. Improve passenger connections that make use of the River Thames, such as linking Tilbury and Gravesend. VI. Target key economically important routes for accident reduction interventions.	improve journey times, reducing congestion on this section of the SRN. The Need for the Project (Application Document 7.1) considers the impact of the Project on safety and notes that, while there is forecast to be more traffic on the road as a result of the Project, primarily as a result of longer journeys, there would be a reduction in the number of accidents within the appraised area, per vehicle mile.
CSTP17: Strategic Freight Movement and Access to Ports Shortened Policy	The Council will support the logistics and port sectors, and the positive impacts of freight activity in Thurrock and beyond, by: 3. Working as part of a Freight Quality Partnership and with other relevant partners, in order to: i. Maximise modal shift opportunities. ii. Ensure freight traffic keeps to the most suitable routes as defined in Thurrock Council's Road Network Hierarchy. iii. Promote the use of less polluting freight vehicles. iv. Reduce the adverse impact of congestion caused by road freight on the A13, A1089, and A1306.	The Transport Assessment (Application Document 7.9) shows that there is forecast to be a decrease in the percentage of HGVs using the Dartford Crossing, thereby improving the performance of the SRN, though notes that in combination, flows for both crossings in the opening year, 2030, and in 2045 is forecast to result in a significant increase in total HGV flows. The Transport Assessment states that as part of the Project's safety and security the new road would include technology to manage traffic and provide better information to drivers, including variable message signs to display variable speed limits, travel information, hazard warnings and both advisory and mandatory signage to drivers. National Highways would be required to comply with the Register of Environmental Actions and Commitments (REAC) ES Appendix 2.2 (Application Document 6.3) in adhering to the agreed routes for freight/construction traffic. This would include a clear understanding of those routes which are not permitted, including any considerations around traffic sensitive routes/roads.

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CSTP18: Green Infrastructure Shortened Policy	1. Green Infrastructure Network I. The Council, with its partners, will restore, protect, enhance and where appropriate create its green assets. The Green Infrastructure seeks to address the connectivity between urban and rural areas in the Borough and ensure that such green assets are multi-functional in use. Green assets can be those in public or private ownership and can be legally protected or covered by non-statutory designations. 2. A net gain and New Development I. The Council will require a net gain in Green Infrastructure. This will contribute to addressing the existing and developing deficiencies, ensuring connectivity and relieving pressure on designated biodiversity sites such as SSSI's. II. Alongside the requirements for biodiversity set out in Policy CSTP19, development must contribute to the delivery of Green Infrastructure, including the acquisition, planning, design and ongoing management consistent with the emerging Greengrid SPD. A key element of this will be connectivity and the integrity of the network; sites should not be considered in isolation. III. Opportunities to increase Green Infrastructure will be pursued in new developments through the incorporation of features such as green roofs, green walls and other habitat/wildlife creation and also innovative technology. IV. Green Infrastructure assets will be identified, enhanced and safeguarded through: i. Not permitting development that compromises the integrity of green and historic assets and that of the overall Green Infrastructure network	A Green Infrastructure Study (Appendix H to this Planning Statement) commissioned for the Project, sets out the 'bigger picture' for the delivery of large-scale Green Infrastructure and is intended to focus attention, 'on land that is to be safeguarded, managed or secured in positive ways to create a multifunctional network of green spaces and assets for which investment can deliver the greatest range of sustainable benefits.' The Study is a key document that has been used to inform the Project's landscape and design. Project proposals arising from the Study include enhancements to the 'Forest circle' around the Ockendon Link and the creation of interconnected 'Greenway routes' through and around the Thames Chase area, partly located in Thurrock. Landscape mitigation in the form of wetland creation is also proposed. Over and above the visual and biodiversity benefits of new habitats around the Mardyke Valley, the proposals would improve the walking, cycling and horse riding (WCH) recreational experience and, potentially, reduce the need for flood compensation on adjacent land. Restoration of the historical fen landscape which has been a long-term aspiration for the group Land of the Fanns and the creation of a Mardyke Valley Country Park are also proposed. These proposals feature in Thurrock Council's Blue Green Infrastructure Strategy. The following four green bridges are proposed within Thurrock, designed to be multi-functional, reducing

Policy	Policy guidance	Policy assessment
	ii. Using developer contributions to facilitate improvements to the quality, use and provision of multi-functional green assets and green linkages iii. Investment from external funding sources.	severance for ecology and providing a better experience for WCHs: • Muckingford Road • Hoford Road • Green Lane • North Road
CSTP19: Biodiversity Shortened Policy	Development will be encouraged to include measures to contribute positively to the overall biodiversity in the Borough. 1. The Biodiversity Network The Council will create a robust network of ecological sites centring on the designated sites, i.e. SSSIs, SPAs, Ramsar, Local Nature Reserves and Local Wildlife Sites. These sites will be safeguarded and enhanced to mitigate the effects of past habitat loss and fragmentation, development and climate change. 2. Positive Biodiversity Management I. The Council will ensure that all designated sites are managed appropriately and will prepare suitable Biodiversity Management Plans, with partners, to demonstrate how positive management will be achieved. II. Buffering and extensions to existing sites and additional habitat will be sought through the adoption of appropriate Biodiversity Site Management Plans. III. Access will be balanced against biodiversity interest. 3. Key Sites The Council has identified the following key sites that it will work with partners to enhance and will pursue	Section 8.6 of Chapter 8: Terrestrial Biodiversity of the ES (Application Document 6.1) identifies opportunities to protect and enhance biodiversity conservation interests. Biodiversity enhancements within Thurrock include the following: • Habitat creation to the north of the River Thames, including a number of habitats created to enhance the environment adjacent to the River, while also increasing the area's biodiversity value. • Within the vicinity of the Mardyke, watercourses to be enhanced to become more suitable for water vole. Seven green bridges are proposed along the Project route, designed to be multi-functional; reducing severance for ecology and providing a better experience for walkers, cyclists and horse riders (WCHs), whilst helping to mitigate the Project's impacts on landscape character and the Green Belt. The following four green bridges are proposed within Thurrock: • Muckingford Road • Hoford Road • Green Lane

Policy	Policy guidance	Policy assessment
	appropriate opportunities to increase the biodiversity network in the Borough. i. East Thurrock Marshes ii. Mardyke Valley Project iii.Local Wildlife Sites iv. Living Landscapes Sites. 4. Climate Change and Habitat Loss The Council recognises the need for mitigation for habitat loss due to climate change. It supports the identification, through the Thames Estuary 2100 project, of potential inter-tidal habitat creation sites at Fobbing Marshes and East Tilbury, and fresh water habitat creation sites at North Fobbing Marshes, South Fobbing Marshes, Tilbury and West Tilbury Marshes and the Mardyke.	• North Road The creation of proposed fenland and wetland habitat reinstates the former landscape character and has been designed to provide visual mitigation and integration of the Viaduct and embankment, especially for users of the Mardyke trail. This is detailed within the Project Design Report (Application Document 7.4). Proposed landscape mitigation based on wetland creation i.e. forming new habitat for biodiversity, would also enhance the WCH recreational experience.
CSTP20: Open Space Shortened Policy	I. The Council will seek to ensure that a diverse range of accessible public open spaces, including natural and equipped play and recreational spaces is provided and maintained to meet the needs of the local community. IV. Wherever possible, open spaces should be identified, planned, designed and managed as areas that can perform multiple functions. Functions to be considered in the planning, design and management of open spaces include: • strategic functions (buffering and linkages) • biodiversity • climate change mitigation and adaptation • historic interest • urban quality • health and well-being	Chapter 13: Population and Human Health in the ES (Application Document 6.1) identifies existing and proposed land uses in the vicinity of the Project and the potential effects of the Project on people and communities. The assessment has considered potential effects of the Project on existing open space, sports and recreational facilities in line with the tests described in the NPSNN. The following existing open space site and two areas of common land would be permanently impacted by the Project. These are not considered surplus to requirements and are to be replaced in accordance with the NPSNN details of this assessment can be found in Appendix D of this Planning Statement. • Tilbury Green Common Land • Ron Evans Memorial Field

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	• sustainable transport and movement • productivity of land (food production, allotments) • community use (places for congregating and events) and • visual amenity.	• Orsett Fen Common Land The proposed replacement open space and areas of common land are located within the vicinity of land which is to be lost as a result of the Project and would be no less advantageous to users both in terms of its equivalent size, quality and location. Further details on open space (and replacement land) are provided in the Statement of Reasons (Application Document 4.1).
CSTP21: Productive Land Shortened *Policy*	The Council recognises the importance of food security and will ensure the protection, conservation and enhancement of agriculture, productive land and soil in the Borough. 1. Ensuring appropriate land management I. The Council will promote the appropriate management and conservation of agricultural land and soil to address the changing climatic and economic environment anticipated in the future. II. Development of the best and most versatile land (DEFRA Grades 1, 2 and 3) will not be supported except in exceptional circumstances. Developers will need to demonstrate that: i. there is no suitable site in a sustainable location on land of poorer agricultural quality ii. alternative sites have greater value for their landscape, biodiversity, amenity, heritage or natural resources or are subject to other constraints such as flooding. III. The Council will take into account the importance and quality of agricultural land when considering land allocation for climate change adaptation/mitigation activities such as new fresh and salt-water habitat.	The Project route has been designed to minimise the land take required to construct and operate the Project, with consideration given to avoiding land of higher agricultural quality. ES Appendix 10.4 (Application Document 6.3) presents the findings of an Agricultural Land Classification assessment. This has established the grade of agricultural land along the route alignment, concluding that the Project design has been optimised to minimise the land take required, in particular where this involves higher quality agricultural land. Grades 1, 2 and 3a land, covering approximately 25.5% of the land within the Order Limits north of the River Thames, represents the Best and Most Versatile agricultural land.

Policy	Policy guidance	Policy assessment
CSTP23: Thurrock Character and Distinctiveness	The Council will protect, manage and enhance the character of Thurrock to ensure improved quality and strengthened sense of place. I. The Council identifies the following key areas where character is a key issue: i. Regeneration Areas ii. Lakeside Basin iii. Strategic Employment Hubs iv. High volume transport networks v. Urban Fringe vi. Town/Village centres vii. Historically Sensitive Areas viii. Strategic Natural and Semi- Natural Spaces ix. Strategic Multifunctional Green Space x. Rural landscapes xi. Green Belt xii. Wooded Hills xiii. Residential Precincts comprising distinctly spacious residential areas and the intensively developed Homesteads ward xiv. Small scale sites where development may contribute to cumulative degradation. II. The Council requires the retention and enhancement of significant natural, historic and built features which contribute to the character of the Borough as defined by their value, quality, cultural association and meaning or their relationship to the setting and local context. III. The Council requires the retention and enhancement of strategic and local views, which contribute to a distinctive sense of place. Where development will affect these views, their sensitivity and capacity for	The Project design is in line with National Highways' The Road to Good Design (2018), requiring road networks to, 'reflect in its design the beauty of the natural, built and historic environment through which it passes, and enhancing it where possible'. The Design Principles document (Application Document 7.5) responds to this requirement. ES Figure 2.4: Environmental Masterplan (Application Document 6.2) identifies the embedded environmental mitigation measures for the Project. A landscape and visual impact assessment has been undertaken in accordance with the methodology set out in Design Manual for Roads and Bridges (DMRB) LA 107 Landscape and Visual Effects (Highways England, 2020a), and relevant guidance including Landscape Institute and Natural England publications. Details are provided in Chapter 7: Landscape and Visual of the ES (Application Document 6.1). The Project Design Report (Application Document 7.4) provides details of the design and structure of the Project route and how this would integrate within the landscape. The Project would be designed to a high standard with measures taken to minimise any impacts as far as possible. Part D of the Project Design Report sets out the following landscape enhancements within Thurrock: Tilbury Marshes area: • Proposed Tilbury Fields landscaped and grassland landform with recreational activities and habitat creation. • Wetland creation for birds of the Thames Estuary and invertebrates adjacent to Coalhouse Fort • Proposed landscaped wooded chalk escarpment.

Policy	Policy guidance	Policy assessment
	change must be adequately assessed and the effect of the development on them appropriately tested. In order to assess the sensitivity and capacity for change of Thurrock's character, the Council will require an assessment based on The Guidelines for Landscape and Visual Impact Assessment, or other methodology supported by the Council. The Council will provide further guidance in the Design and Sustainability SPD.	• Proposed Tilbury Field walking, cycling and horse riding (WCH Routes) and FP200 connections. Chadwell link area: • Proposed Muckingford Road green bridge. • Proposed large detention basin north of Muckingford Road • Proposed Holford Road green bridge and woodland planting. • Woodland planting on the proposed false cutting south of the route alignment. • Expanding the woodland cover associated with Orsett Golf Course • Proposed WCH at FP78 and High House Lane, Muckingford Road shared track, BR38, FP 61 and Hoford Road. A13/A1089/A122 Lower Thames Crossing junction area: • Proposed wooded ridge, with woodland planting. • Proposed agroforestry parcels within the A13 junction. • WCH proposals to improve east-west commuter connections and increase the opportunity for WCH to cross the A13. • Orsett Fen area: • Proposed Green Lane green bridge. • Proposed two linear detention basins north of Green Lane. • Proposed Mardyke wetland creation centred-on Orsett Fen

Policy	Policy guidance	Policy assessment
		• Proposed strengthening of woodland north of the Veolia landfill site. • North Road green bridge • Improved WCH access from the southern and western ends of the Ockendon Link. Ockendon Farmland area: • Proposed roadside woodland planting around the A122 Lower Thames Crossing/M25 junction. • WCH access from Thames Chase to recreational routes east of the M25.
CSTP24: Heritage Assets and the Historic Environment Shortened Policy	1. Protecting and Enhancing Heritage Assets I. The Council will preserve or enhance the historic environment by: i. Promoting the importance of the heritage assets, including their fabric and their settings ii. Encouraging the appropriate use of heritage assets and their settings iii. Supporting increased public access to historic assets, including military and industrial heritage iv. Reviewing the designation of local heritage assets, including considering the designation of new Conservation Areas v. Retaining non-designated heritage assets which are considered locally important as well as those with statutory protection vi. Encouraging proposals that include enhancement of surrounding landscapes and integration between priority heritage assets and the Greengrid. 2. Proposed Development I. All development proposals will be required to consider and appraise development options and demonstrate	Chapter 6: Cultural Heritage of the ES (Application Document 6.1) examines the potential effects of the Project on cultural heritage during both the construction and operational phases. The assessment of effects on cultural heritage has considered construction and operational effects on archaeological remains, built heritage and historic landscapes. Information regarding the historic environment in Section 6.4 of Chapter 6 has been obtained from relevant sources including Historic Environment Records. The Project would permanently impact on the following designated heritage assets within Thurrock: • Scheduled Orsett Crop Mark Complex (SM1) • Grade II Listed Buildings at Nos.1 and Nos. 2 Greys Corner Cottages (LB89), Thatched Cottage (LB58) and Murrells Cottages (LB96) The Project would permanently impact on the following high-value non-designated archaeological assets north of the River Thames which would experience significant permanent effects:

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	that the final proposal is the most appropriate for the heritage asset and its setting, in accordance with: i. The objectives in part 1 above ii. The requirements of PMD 4 Historic Environment iii. Conservation Area Character Appraisals and Management Proposals as appropriate iv. Relevant national and regional guidance.	• Cropmarks identified at Grey Goose Farm (247) • Long barrow or mortuary enclosure (325) • Early Prehistoric to Late Prehistoric activity associated with wetland occupation on the Mark Dyke Valley (4626) • Neolithic to Medieval multi-period site of settlement, industrial, funerary and agricultural activity south of Gravelpit Farm (496) • Bronze Age and Iron Age cropmark complex (2078) Chapter 4 of this Planning Statement sets out the Project's case for compliance, demonstrating the compelling need for the Project and delivery of its substantial public benefits, representing circumstances which are wholly exceptional and justify the loss or substantial harm to historic assets. The Need for the Project (Application Document 7.1) explains the benefits of the Project as follows: • The considerable journey time saving benefits • Enhanced connectivity • Improved productivity of businesses in the Lower Thames and wider region due to faster and more reliable journeys and improved accessibility • Significantly reduced congestion at the Dartford Crossing • Provision of substantial additional capacity and new route options across the Thames east of London A small part of the northern extent of Tilbury Fort Scheduled Monument (SM13) and Coalhouse Fort Scheduled Monument (SM14) are both located within

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		the Order Limits, though neither are impacted by the Project. Design Principal S9.05 promotes public access between Tilbury Fort and Coalhouse Fort, landscaping and interpretation to better reveal the significance of the relationship between Tilbury and Coalhouse Forts and heritage interpretation along Two Forts Way.
CSTP25: Addressing Climate Change Shortened Policy	1. Adaptation I. The Council will require climate change adaptation measures and technology to be considered from the outset in any development proposal including reduction of emissions, renewable and low carbon technologies, passive design, recycling and waste minimisation, and through the application of green infrastructure techniques. II. The Council will work to ensure that vulnerability to climate change impacts is minimised in new development, and that such development does not increase vulnerability to climate change impacts. IV. Developers must consider the potential effects of climate change on their development, including: i. Water conservation and drainage ii. Need for summer cooling iii. Risk of subsidence iv. Flood risk from tidal, fluvial and surface water	National Highways is committed to reducing carbon emissions and working closely with suppliers to reduce emissions from network related activity. Contractors would be required to produce a Site Waste Management Plan setting out procedures for the characterisation, management and monitoring of waste arisings and to ensure the waste hierarchy is implemented with opportunities to reduce waste generation or improve recovery/recycled rates. Chapter 15: Climate of the ES (Application Document 6.1) states that the effects on climate as a result of the Project are not significant. Section 15.3: Assessment methodology and Section 15.6 Assessment of likely significant effects, considers the carbon impacts of the Project during construction and operation and compares these to the Government's relevant carbon budgets. National Highways is committed to reducing emissions wherever practicable and supporting the UK Government in meeting its carbon reduction targets. Paragraph 5.17 of the NPSNN states that, 'It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets'. Emissions arising as a result of the Project represent less than 0.08% of total emissions in any 5-year

Policy	Policy guidance	Policy assessment
		carbon budget during which they arise and it is therefore concluded that the greenhouse gas (GHG) impact of the Project would not have a material impact on carbon reduction targets set by the UK Government. The Carbon and Energy Management Plan (Application Document 7.19) presents the energy management strategy for the Project, identifying potential opportunities for the utilisation of renewable energy on the Project. The Code of Construction Practice (CoCP) (ES Appendix 2.2, Application Document 6.3) requires that energy consumption and materials used are recorded on an ongoing basis during the Project construction phase. A further carbon assessment, including greenhouse gas (GHG) emissions, would be undertaken post-construction. The Project design has built-in climate change resilience in several ways. For example, the operational drainage design has included an allowance for the predicted changes to rainfall intensity and the implications for operational road drainage volumes and rates. The findings of the Flood Risk Assessment presented in ES Appendix 14.6 (Application Document 6.3) has informed the Project design to ensure its resilience to predicted climate change effects on river flows and water levels in the Thames Estuary. Key elements of the design that deliver this resilience are the vertical alignment of the main road, the design of watercourse crossings and additional protection measures for the tunnel portals. Climate change effects on groundwater resources have also been considered in the design of the Project. Further details are provided in Appendix

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		14.5: Hydrogeological Risk Assessment and Appendix 14.6: Flood Risk Assessment (Application Document 6.3) of the ES.
CSTP26: Renewable or Low-Carbon Energy Generation Shortened Policy	IV. The Council will ensure that effort is made to achieve a significant carbon reduction in all new development, at least matching the national targets.	Application Document 7.19 comprises a Carbon and Energy Management Plan which sets out the mechanisms National Highways will use to lead the industry in the adoption of low carbon innovation and deliver a carbon neutral construction of the Project in support of Government's ambition of a transition to Net Zero.
CSTP27: Management and Reduction of Flood Risk Shortened Policy	I. The Council will ensure that flood risk management is implemented and supported through effective land use planning. The Sequential, and where necessary Exception Test, as set out in the NPPF and associated Planning Practice Guidance will be employed when allocating sites for development and an Emergency Plan for the Borough will be completed. VI. Developers will be required to incorporate sustainable drainage systems as a priority and to contribute towards flood risk management infrastructure where appropriate. VII. Planning applications received for sites within Flood Zone 3 will be treated in accordance with the NPPF, this policy and Policy PMD15.	ES Appendix 14.6: Flood Risk Assessment (FRA) (Application Document 6.3) identifies the Project's location within areas at risk of flooding, falling in Flood Zone 1 (low probability of river and sea flooding), with parts of the Project in Flood Zone 3 (high probability of river and sea flooding). This indicates that the majority of the route alignment is in an area of low probability of flooding. For areas of the Project that lie in Flood Zone 3 within Thurrock, these would benefit from existing flood defences as follows: • Adjacent to the River Thames (north). • Near to the Mardyke (main river). The FRA has considered all sources of flood risk, informed by extensive consultation with the Environment Agency and relevant Lead Local Flood Authorities, as well as the results of hydrological and hydraulic modelling of the Mardyke, the Tilbury Main and the influence of the tidal River Thames on the flow regimes of these watercourses. The FRA provides the necessary evidence to satisfy the Exception Test for those areas of the route alignment within Flood Zone 3. Further evidence in support of the Exception Test, regarding the

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		sustainability benefits of the Project, is summarised in the Need for the Project (Application Document 7.1). Incorporation of a suite of flood alleviation measures to prevent increases in flood risk elsewhere include the provision of compensation storage for any permanent losses of floodplain storage volume associated with the Tilbury Main, Mardyke and Mardyke West tributary.
CSTP28: River Thames Shortened Policy	I. The Council and Partners will ensure that the economic and commercial function of the river will continue to be promoted through: a. To safeguard existing and promote new jetties and wharves facilities where appropriate for transport of goods and materials. II. New development will provide new or enhanced sustainable, safe and equitable access to and along the river foreshore, especially using natural and semi-natural corridors and other elements of the Greengrid. III. Development Proposals will be required to undertake appropriate level of flood risk assessment as set out by the NPPF and take account of the need for flood mitigation measures and to accommodate any necessary flood defence measures. IV. New development will also maintain or enhance views, particularly of key features including heritage and landscapes, and will improve recreational interaction with the river and its setting. Critical elements include: i. The Thames Path through Thurrock, a designated National Trail. ii. National Cycle Network Route 13, which overlaps with the Thames Path through much of Thurrock.	Chapter 9 Marine Biodiversity of the Environmental Statement (ES) (Application Document 6.1) has assessed the Project in relation to relevant marine receptors and has concluded that there are no likely significant effects on marine biodiversity which cannot be avoided or mitigated. Biodiversity offsetting for marine receptors is not therefore required. The Thurrock Greengrid Strategy has provided relevant guidance in preparing the Green Infrastructure Study (Appendix H). The Study is a key document that has been used to inform the Project's landscape and design, as well as incorporating embedded and essential mitigation. The Design Principles (Application Document 7.5) seeks to promote public access between Tilbury Fort and Coalhouse Fort, landscaping and interpretation to better reveal the significance of the relationship between Tilbury and Coalhouse Forts, along with heritage interpretation along Two Forts Way. A Flood Risk Assessment (FRA) ES Appendix 14.6 (Application Document 6.3) identifies the area of the Project within Thurrock as lying within Flood Zone 3. Areas of the Project that lie in Flood Zone 3 currently benefit from existing flood defences adjacent to the

Policy	Policy guidance	Policy assessment
	iii. Safeguarding of strategic and locally important views. V. The following exceptions to this may apply: i. Where industrial/commercial development requires use of the river and its foreshore and needs to restrict public access for operational or safety reasons. ii. Where unrestricted public access is likely to result in unacceptable adverse impacts on riverside habitat or biodiversity. In both cases, reasons for access restrictions will need to be substantiated and justified with supporting evidence. In addition, the expectation will be that opportunities will still be sought to enable views of the river and its setting, such as through the design of development.	River Thames (north) and near to the Mardyke (main river). The Project has incorporated a suite of flood alleviation measures intended to prevent increases in flood risk elsewhere. This includes the provision of compensatory storage for any permanent losses of floodplain storage volume associated with the Tilbury Main, Mardyke and Mardyke West tributary.
CSTP29: Waste Strategy Shortened Policy	1. Waste Planning Strategy The Council will seek to drive waste management up the waste hierarchy by: I. Ensuring developments minimise waste at source and maximise use of recycled materials. Within major developments provision should be made for local waste reduction, recycling and management. II. Reducing waste arisings and increased re-use/recycling and recovery of waste. The level of biodegradable waste going to landfill will be reduced by increasing recycling and composting rates for all municipal, commercial and industrial waste. III. Creating a sustainable network of waste management facilities that complements the sustainability objectives in accordance with the Thurrock Sustainable Communities Strategy.	An assessment undertaken within Chapter 11: Material Assets and Waste of the ES (Application Document 6.1), shows that of the total waste arisings from the Project, 82% would be subject to diversion from landfill, complying with the legal minimum diversion rate of 70% from the Waste Framework Directive. Material use and waste generation is expected during both construction and operation of the Project, with estimated waste generated considerably more during the construction phase. Design mitigation includes identifying, securing and using materials onsite, reducing the need to import fill materials. Estimates of materials to be generated onsite and used during construction are presented in Appendix 11.4 Materials Assets Assessment Supporting Data (Application Document 6.3) of the ES.

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	IV. Seeking to treat waste as a 'resource' and where possible use waste to drive forward local renewable energy objectives. 8. General Environmental Principles The Council will reduce, as far as practicable, any negative environmental impacts that may arise from waste management proposals, as well as ensure that the recovery or disposal of waste takes place without endangering human health, especially from the landfilling of waste, through cross-cutting development management policies set out in this Core Strategy and the MWDPD. All proposals for waste management use will be required to conform with the policies and site allocations set out in the Minerals and Waste DPD.	In terms of sustainability objectives, contractors would be required to produce a Site Waste Management Plan setting out procedures for the characterisation, management and monitoring of waste arisings and to ensure the waste hierarchy is implemented with opportunities to reduce waste generation or improve recovery/recycled rates. Contractors would be required to achieve a target of 70% (by weight) of hazardous construction waste to be diverted from landfill. [REAC Ref No. MW013]. Where hazardous construction waste cannot be diverted from landfill, justification and evidence for this will need to be provided by Contractors. [REAC Ref No. MW015] Appendix 11.1: Excavated Materials Assessment (Application Document 6.3) of the ES shows that sufficient capacity exists in the region to support recovery and diversion from landfill. A number of facilities with void capacity for inert waste have been identified in the study area. Contractors are to utilise the methodology in the Excavated Materials Assessment, Appendix 11.1 (Application Document 6.3) of the ES to identify reuse sites that score positively against the sustainability scoring system presented in the assessment [REAC Ref No. MW012]. Good practice mitigation forms part of the Code of Construction Practice (CoCP) (Application Document 6.3) and seeks to minimise the use of primary materials used in construction to be from recycled or secondary sources in line with the Design Manual for Roads and Bridges (DMRB) LA 110 Material assets and Waste (Highways England, 2019). Good practice also includes responsible sourcing through priority

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		given to using primary, secondary and recycled aggregates from Kent, Essex and Greater London.
CSTP32: Safeguarding Mineral Resources Shortened Policy	1. Mineral Safeguarding Area All site allocations for mineral extraction identified in the forthcoming Thurrock Local Plan will be based on the MSA to be identified in the forthcoming Thurrock Local Plan and on the Proposals Map. All areas identified in the MSA will be safeguarded from non-mineral related development. Applications for non-mineral related development on the site allocations will be assessed against the policies provided in the forthcoming Thurrock Local Plan.	A Mineral Safeguarding Assessment Report ES Appendix 11.2 (Application Document 6.3) has been prepared to assess whether the Project route would sterilise the mineral resource capacity within defined Mineral Safeguarding Areas (MSAs) and, if so, whether removal prior to development is warranted. The MSA undertook a review of relevant local policy including CSTP32 and noted that, although the policies set out the approach for safeguarding mineral resources and facilities, the core strategy does not provide the details of any MSAs or strategically allocated sites for mineral extraction and mineral infrastructure, but rather states that these would be defined in the forthcoming local plan, which has yet to be published. Accordingly, the council relies on the Essex Minerals Local Plan for its mineral policy. See Table C.14 below.
PMD1: Minimising Pollution and Impacts on Amenity Shortened Policy	1. Development will not be permitted where it would cause or is likely to cause unacceptable effects on: i. the amenities of the area ii. the amenity, health or safety of others iii. the amenity, health or safety of future occupiers of the site iv. the natural environment. 2. Particular consideration will be given to the location of sensitive land uses, especially housing, schools and health facilities, and nationally, regionally and locally designated biodiversity sites, and areas of recreational and amenity value which are relatively undisturbed by noise and valued for this reason.	The Applicant has submitted an ES with its application (Application Document 6.1) which reports on the assessment of effects of the Project as well as proposed mitigation measures to avoid, reduce or remediate these effects. This includes chapters which address the points at PMD1 point 3. Chapter 13: Population and Human Health of the Environmental Statement (ES) (Application Document 6.1) and the Health and Equalities Impact Assessment (HEqIA) (Application Document 7.10) have considered the impacts of the Project on sensitive land uses as well as proposed mitigation measures to avoid, reduce or remediate these impacts.

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	3. The Council will require assessments to accompany planning applications where it has reasonable grounds to believe that a development may suffer from, or cause: i. Air pollution ii. Noise pollution iii. Contaminated land/soil iv. Odour v. Light pollution and shadow flicker vi. Water pollution vii. Invasion of privacy viii. Visual intrusion ix. Loss of light x. Ground instability xi. Vibration 4. Where the assessment confirms such potential harm, planning permission will only be granted if satisfactory solutions can be achieved through design, or suitable mitigation measures can be put in place through conditions or a planning obligation. Where an assessment is not forthcoming the Council may refuse permission on a precautionary basis. 5. The Council will seek compliance with, and contribution to, EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality in local areas arising from individual sites.	Chapters 8: Terrestrial Biodiversity and 9: Marine Biodiversity of the ES (Application Document 6.1) as well as the Habitat Regulations Assessment Screening Report and Statement to Inform an Appropriate Assessment (Application Document 6.5) provide an assessment of likely significant effects on internationally, nationally and locally designated sites of ecological importance. A number of embedded, essential and good practice mitigation measures have been considered as part of these assessments, which are secured through the draft DCO (Application Document 3.1). Chapter 7: Landscape and Visual of the ES (Application Document 6.1) provides details of the lighting proposals along the Project route. The Landscape and Visual assessment has been based on the Institution of Lighting Professional's (2020) Guidance Notes on the Reduction of Obtrusive Light – Guidance Note 01/20 with respect to light pollution effects and impacts on landscape character and visual amenity. Mitigation measures to reduce the impact of light pollution include reduced lighting column heights and the use of LED luminaires to reduce light spill. Chapter 10 Geology and Soils and Chapter 14 Road Drainage and the Water Environment of the ES (Application Document 6.1) assess the potential impacts arising from pollution and contaminants with proposals for mitigation and remediation measures where necessary. A preliminary assessment of land instability was completed at the early design stage and is presented in ES Appendix 10.2: Stability Report (Application Document 6.3). This concluded that there are no

Policy	Policy guidance	Policy assessment
		significant risks identified relating to land instability and where risk cannot be ruled out, feasible engineering solutions are available to manage the risk. ES Chapter 5: Air Quality and Chapter 12: Noise and Vibration (Application Document 6.1) assess the impact of the Project on air quality (taking account of the presence of Air Quality Management Areas (AQMAs), noise and vibration and conclude that there would be no significant impacts arising from the Project on air quality or noise and vibration. Chapter 5 also assesses the impact of dust and odour emissions and concludes that there would be impacts arising from dust emissions during construction. Proposed mitigation includes a range of measures to manage dust emissions, as well as air quality monitoring during the construction phase. There are not considered to be any significant dust and odour emissions during the operation of the Project and therefore no mitigation is needed. To ensure effective monitoring of air quality and noise during the construction phase, a requirement would be attached to the draft Development Consent Order (dDCO) ((Application Document 3.1), requiring the preparation of an Environmental Management Plan (EMP2), to be prepared in line with the approved Code of Construction Practice (CoCP) (Application Document 6.3) and Register of Environmental Actions and Commitments (REAC) (Application Document 6.3, Appendix 2.2 of the ES).
PMD2: Design and Layout Shortened Policy	1. The Council requires all design proposals to respond to the sensitivity of the site and its surroundings, to optimize the potential of the site to accommodate development, to fully investigate the magnitude of	Application Document 7.4 comprises a Project Design Report with Parts D2 and D3 covering those parts of the Project between the North Portal and the A13 and the A13 and the M25 respectively. The report has

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	change that would result from the proposals, and mitigate against negative impacts. All development proposals must satisfy the following criteria: i. Character – Development must contribute positively to the character of the area in which it is proposed, and to surrounding areas that may be affected by it. It should seek to contribute positively to local views, townscape, heritage assets and natural features, and contribute to the creation of a positive sense of place. viii. Landscape – Features contributing to the natural landscape in the Borough, such as woods, hedges, specimen trees, unimproved grassland, ponds and marshes, will be protected and where appropriate enhanced to maintain their landscape and wildlife value. Provision and enhancement of landscape features will also be required to contribute to multiple uses and/or eco-system services, including amenity, recreation, flood alleviation and Sustainable Urban Drainage Systems. x. Utilities – Development proposals must accommodate public services and utilities without compromising design and layout. This includes providing suitable access to maintenance, waste and emergency service vehicles. xi. Energy and Resource use – Development should be designed to minimise energy and resource use. This includes integrating sustainable construction techniques, siting and orientation of buildings to maximise energy and water efficiency.	been prepared to demonstrate compliance with paragraphs 4.28-4.35 of the NPSNN which set out the criteria for 'good design' for national networks infrastructure projects noting that achieving good design outcomes design should be an integral consideration from the outset. These principles and the detail contained in the Project Design Report match those contained in this local plan policy.
PMD4: Historic Environment Shortened Policy	The Council will ensure that the fabric and setting of heritage assets, including Listed Buildings, Conservation Areas, Scheduled Monuments and other	Chapter 6: Cultural Heritage of the ES (Application Document 6.1) examines the potential effects of the Project on cultural heritage during both the

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	important archaeological sites, and historic landscape features are appropriately protected and enhanced in accordance with their significance. 2. Applications must demonstrate that they contribute positively to the special qualities and local distinctiveness of Thurrock, through compliance with local heritage guidance including: • Conservation Area Character Appraisals • Conservation Area Management Proposals • Other relevant Thurrock-based studies, including the Landscape Capacity Study (2005), the Thurrock Urban Character Study (2007) and the Thurrock Unitary Historic Environment Characterisation Project (2009). • Further local guidance as it is developed. 3. The Council will follow the approach set out in the NPPF in the determination of applications affecting Thurrock's built or archaeological heritage assets including the expectation that the relevant historic environment record will be consulted and the heritage asset(s) assessed using appropriate expertise where necessary. This will include consideration of alterations, extensions or demolition of Listed Buildings or the demolition of unlisted buildings within Conservation Areas, and requirements for pre-determination archaeological evaluations and for preservation of archaeology in situ or by recording	construction and operational phases. The assessment of effects on cultural heritage has considered construction and operation effects on archaeological remains, built heritage and historic landscapes. Information regarding the historic environment presented in Section 6.5 of Chapter 6 has been obtained from relevant sources including Historic Environment Records. The Project would have significant permanent impacts on the following designated heritage assets within Thurrock: • Scheduled Orsett Crop Mark Complex (SM1) • Grade II Listed Buildings at No. 1 and No. 2 Greys Corner Cottages (LB89), Thatched Cottage (LB58) and Murrells Cottages (LB96) Chapter 6 of this Planning Statement sets out the Project's case for compliance with National Policy and in Chapter 4 demonstrating the compelling need for the Project and delivery of its substantial public benefits represent circumstances which are wholly exceptional and justify the loss or substantial harm to historic assets. Further assessment of the Need for the Project can be found in Application Document 7.1.

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PMD5: Open Spaces, Outdoor Sports and Recreational Facilities Shortened Policy	EXISTING FACILTITES 1. The Council will safeguard all existing open spaces, outdoor sports and recreational facilities. Development proposals that would result in their complete or partial loss or cause or worsen a deficiency in the area served by the space or facility will not be permitted unless: i. conveniently located and accessible alternative facilities of an equivalent or improved standard will be provided to serve current and potential new users; or improvements to remaining spaces or facilities can be provided to a level sufficient to outweigh the loss ii. proposals would not negatively affect the character of the area and/or the Greengrid. Any alternative and improved facilities should be available for use before an existing open space or facility is lost. NEW DEVELOPMENT 3. Proposed development must ensure that: i. New open spaces, outdoor sports and recreational facilities are provided in accordance with adopted standards to meet the needs of the development and to address deficiencies. ii. New facilities are fully integrated into the design of development schemes as an element of place making. iii. Facilities are safe and easily accessible to all. Where the Council considers that provision on-site is not feasible or appropriate, it will require developer contributions to improve existing, or provide new, spaces or facilities elsewhere.	Chapter 13: Population and Human Health in the ES (Application Document 6.1) identifies existing and proposed land uses in the vicinity of the Project and the potential effects of the Project on people and communities. The assessment has considered the potential effects of the Project on existing open space, sports and recreational facilities in line with the tests described in the NPSNN. An existing open space site and two areas of common land would be permanently impacted by the Project and have been assessed as not being surplus to requirements. The three affected sites are: • Tilbury Green Common Land • Ron Evans Memorial Field • Orsett Fen Common Land The proposed replacement sites are located within the vicinity of land which is to be lost and would be no less advantageous in terms of their size, quality or location. Further details on affected open space and replacement land is provided in Appendix D of the Planning Statement and the Statement of Reasons (Application Document 4.1).

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PMD6: Development in the Green Belt Shortened Policy	The Council will maintain, protect and enhance the open character of the Green Belt in Thurrock in accordance with the provisions of the NPPF. The Council will plan positively to enhance the beneficial use of the Green Belt by looking for opportunities to provide access to the countryside, provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, and to improve damaged and derelict land. Planning permission will only be granted for new development in the Green Belt provided it meets as appropriate the requirements of the NPPF, other policies in this DPD.	The Green Belt accounts for approximately 60% of Thurrock's total land area. A response to the location of the Project in the Green Belt is provided in Appendix E of this Planning Statement. The assessment acknowledges that the Project as a whole constitutes 'inappropriate' development in the Green Belt, although considers that a number of component parts can be regarded as 'appropriate' development. However, as an 'inappropriate' form of development in the Green Belt, the impact of the Project on the openness and purposes of the Green Belt has been carried out and Appendix E of this Planning Statement identifies the factors that constitute 'very special circumstances' in justifying the Project's development in the Green Belt. In terms of enhancements within the Green Belt, four green bridges in Thurrock are designed to be multi-functional, reducing severance for ecology, providing a better experience for walkers, cyclists and horse riders and helping mitigate the Project's impact on the landscape character of the Green Belt. The creation of Mardyke Valley Country Park as discussed in the Green Infrastructure Study (Appendix H to this Statement). The proposed landscape mitigation based on wetland creation, forming new habitat for biodiversity, would also enhance the WCH recreational experience. Further information is provided in Chapter 8: Terrestrial Biodiversity, of the ES (Application Document 6.1).
PMD7: Biodiversity, Geological Conservation and Development	1. Development proposals will be required to demonstrate that any significant biodiversity habitat or geological interest of recognised local value is retained	Section 8.6 in Chapter 8: Terrestrial Biodiversity of the Environment Statement (ES) (Application Document 6.1) assesses the potential effects of the Project on

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	and enhanced on-site. Where it can be demonstrated that this is not possible, and there is no suitable alternative site available for the development, developers will be required to show that their proposals would mitigate any loss of biodiversity or geological interest. In circumstances where it can be demonstrated that neither retention on site nor mitigation is possible, developers will be required to provide appropriate compensation for any significant loss of biodiversity or geological interest, such that there is no overall net loss of biodiversity habitat or features of geological conservation interest in Thurrock. The Council will seek to achieve net gains in biodiversity where such gains would be possible, with particular reference to the desirability of recreating priority habitats and the recovery of priority species. 2. The Council will not permit development that would result in the loss, or partial loss, of a locally designated biodiversity or geological site, except in exceptional circumstances where it can be demonstrated that there is no alternative, subject to the sequential approach outlined in (1) above. 3. To enable the Council to determine an application which would result in a loss of biodiversity or geological value, the developer will be required to submit a detailed justification setting out: i. why the loss is considered to be unavoidable ii. an assessment of what species and habitat would be lost or adversely affected as a result of development (including an ecological survey where appropriate) iii. how the loss or adverse effect is proposed to be mitigated onsite through habitat restoration or creation; and/or compensated for through the acquisition and management of a suitable site within the area, or a	ecological receptors with habitat loss and degradation. The following biodiversity sites would be significantly impacted by the Project within Thurrock: • Low Street Pit Local Wildlife Site (LWS) • Blackshots Nature Area LWS • Rainbow Shaw LWS • Loss of habitat used by terrestrial invertebrates Chapter 8 also provides a full justification for why these losses are considered necessary and also the measures proposed to mitigate these losses. Mitigation measures include replacement of land and landscape features, proposed green bridge structures along the Project route and extensive woodland planting at the junctions, as well as further additional linear planting and wider hedgerow reinstatement adjacent to the Project route to aid visual screening and landscape integration. In addition, typically 4m high false cutting earthworks would provide permanent visual screening. The following four green bridges are proposed within Thurrock: • Muckingford Road • Hoford Road • Green Lane • North Road Section 8.6 of Chapter 8 Terrestrial Biodiversity of the ES (Application Document 6.1) identifies opportunities to protect and enhance biodiversity and geological conservation interests, including the following within Thurrock:

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	financial contribution towards the purchase and management of such a site or management of an existing site to bring it up to a necessary standard. 4. Thurrock Council will require development proposals to incorporate biodiversity or geological features into the design as far as possible. These may include green roofs, brown roofs and the creation of green corridors for wildlife. 5. Where it is necessary to secure the biodiversity or geological interest of a development site, the Council will seek the provision and implementation of a Biodiversity or Geological Management Plan through planning obligations. The Council will evaluate development proposals and biodiversity management plans or geological management plans against recognised best practice.	Habitat creation to the north of the River Thames, including a number of different habitats created to enhance the environment adjacent to the River, while also increasing the area's biodiversity value. Within the vicinity of the Mardyke, watercourses would be enhanced to become more suitable for water vole. Chapter 9: Marine Biodiversity of the Environmental Statement (ES) (Application Document 6.1) outlines the effects of the Project on marine benthic habitats, benthic invertebrates and marine mammals. Potential effects related to construction, operation and decommissioning of the northern tunnel entrance compound drainage pipeline and outfall; permanent Project water management outfall; tunnel boring operations; and tunnel operation, have been assessed in relation to relevant marine receptors. A number of embedded, essential and good practice mitigation measures (set out in section 9.5 of ES Chapter 9: Marine Biodiversity, Application Document 6.1) have been considered as part of the assessment. Application of these measures resulted in no likely significant effects on designated sites of ecological importance or protected species and habitats being identified. Chapter 10: Geology and Soils of the ES (Application Document 6.1) states that there are no internationally or nationally designated sites of geological conservation within Thurrock.
PMD9: Road Network Hierarchy Shortened Policy	1. Routes of all levels The Council will only permit the development of new accesses or increased use of existing accesses where:	The Project would have an impact on the highway network which would see some increase in traffic on local roads both during the construction and operation of the Project. However, this needs to be considered

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	• There is no possibility of safe access taken from an existing or proposed lower category road • The design of the development minimises the number of accesses required. • The development makes a positive contribution to road safety or road safety is not prejudiced. • The development preserves or enhances the quality of the street scene. • The development avoids causing congestion as measured by link and junction capacities. • Measures are taken to mitigate all adverse air quality impacts in or adjacent to Air Quality Management Areas. • The development will minimise adverse impacts on the quality of life of local residents, such as noise, air pollution, and the general street environment. • The development will make a positive contribution to accessibility by sustainable transport. These criteria apply to routes of all levels (1, 2 and 3). The following principles also apply to particular levels: 2. Level 1 Routes - Corridors of Movement. There is a presumption against new accesses or the increased use of an existing direct access onto a Corridor of Movement. Development served by side roads connecting to a Corridor of Movement will only be permitted where it can be demonstrated that the Corridor of Movement will not be adversely affected in terms of highway safety and traffic capacity.	in the wider regional and national transport, connectivity and economic contexts in terms of the need for the Project (Application Document 7.1) and the highways congestion which would be alleviated elsewhere. The DCO Application is supported by a Transport Assessment (TA) (Application Document 7.9). The TA forecasts no significant impacts on public transport networks. There would be some temporary impacts on walkers, cyclists and horse riders (WCH) but, overall, the Project would result in an improved network for WCH with the provision of over 46km of new or improved footpaths, bridleways and shared tracks. The TA is supported by a Framework Construction Travel Plan (Application Document 7.13) and an outline Traffic Management Plan for Construction (Application Document 7.14) which would address transport impacts during construction: In addition, Site Specific Travel Plans for each compound or Utility Logistics Hub (ULH) or groups of compounds or ULH where these are closely located with similar levels of accessibility would be produced which will also address these matters. Delivery of these documents is secured through the Code of Construction Practice (ES Appendix 2.2, Application Document 6.3) which, in turn, is secured through Requirement 10 of Part 1 to Schedule 2 of the dDCO (Application Document 3.1). National Highways also proposes to implement a monitoring scheme as defined within the Wider Networks Impacts Management and Monitoring Plan (Application Document 7.12) to monitor the impacts of the Project on the wider network and actively engage

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	Development will not be permitted where it impacts adversely on capacity and safety. Where the Corridor of Movement comprises an Inter-urban Public Transport Route or provides access to one or more of the Borough's ports, new accesses must not have an adverse impact on the free flow of traffic. Exceptions will be made only for developments of overriding national importance, strategic sites allocated in this Local Development Plan, and strategic public transport facilities.	with local authorities on the findings and help secure Government funding for further projects to address these impacts. This would be secured in accordance with Requirement 14 of Part 1 to Schedule 2 of the DCO (Application Document 3.1). Chapters 5: Air Quality and 12: Noise and Vibration, of the ES (Application Document 6.1) address matters related to noise and air quality.
PMD10: Transport Assessments and Travel Plans Shortened Policy	Transport Assessments, Transport Statements, and Travel Plans must accompany planning applications in accordance with the Department for Transport guidance in Guidance on Transport Assessments (March 2007). Travel Plans must be consistent with Council policies. They will normally be secured through planning obligations, although planning conditions might suffice where this will clearly be the best option because the outcomes and measures required are simple and very clear, such as where the travel plan is for an existing use.	A Transport Assessment (Application Document 7.9) has been prepared in support of the Project. Travel Plans for the movement of personnel to and from the worksites would be developed by the Contractors following latest guidance and best practice. Site Specific Travel Plans would be produced by the Contractors for each compound or ULH, or compounds or ULH where these are closely located with similar levels of accessibility. Details of the Travel Plans are provided within the Framework Construction Travel Plan (Application Document 7.13) and are secured through Schedule 2 Requirement 4 of the draft Development Consent Order (Application Document 3.1).
PMD14: Carbon Neutral Development	The Council will require developers to demonstrate that all viable energy efficiency measures and renewable or low-carbon technology opportunities have been utilised to minimise emissions, in accordance with PMD12 and PMD 13. Thereafter:	Chapter 15: Climate of the Environmental Statement (Application Document 6,1) assesses the potential 'worst case scenario' impacts of the Project on Greenhouse Gas Emissions and climate change. It is supported by a Carbon and Energy Management Plan

Policy	Policy guidance	Policy assessment
	Any development (whether new build, conversion or renovation) that would lead to a net increase in carbon dioxide emissions, over and above existing emissions for the development site, will be required to make contributions to the Thurrock Carbon Offset Fund. The net greenhouse gas emissions from the new development will be measured as tonnes per year. Financial contributions to the Thurrock Carbon Offset Fund will be based on the methodology set out in the forthcoming Developer Contributions SPD and the Design and Sustainability SPD.	(Application Document 7.19). This Plan quantifies the likely carbon emissions generated by the project and methods for reducing them and sets out how the Project would contribute to the UK's net zero carbon goal. It shows how the Applicant has acted to reduce emissions by including mitigation measures embedded in the preliminary design and by embedding carbon reductions in the construction stage through the procurement process to ensure that the Contractors are contractually bound to comply with relevant commitments made as part of this application. These measures and an explanation of how they would be secured through the REAC (Section 7 of the CoCP, Application Document 6.3) are set out in section 3 of the Carbon & Energy Plan (Application Document 7.19). Paragraph 15.6.24 of Chapter 15 of the ES identifies that, when GHG emissions from the Project would be at their highest, most intense level (short-term construction activity), the Project would contribute no more than 0.06% of total emissions in any five-year carbon budget during which they arise (see Table 15-17 of Chapter 15 Climate of the ES (Application Document 6.1)). Accordingly, it is concluded that the GHG impact of the Project would not have a material impact on carbon reduction targets as set by the UK Government and is therefore not significant.
PMD15: Flood Risk Assessment Shortened Policy	1. Applications relating to sites not covered by the Thurrock Sequential Test will be required to be supported by a site-specific Sequential Test to demonstrate compliance with the NPPF, and associated Planning Practice Guidance. To reflect the nature of Thurrock's defended floodplain, particular	ES Appendix 14.6: Flood Risk Assessment (FRA) (Application Document 6.3) identifies the Project as lying within areas at risk of flooding, with parts of the Project route in Flood Zone 3, (high probability of river and sea flooding) and the remainder falling in Flood Zone 1 (low probability of river and sea flooding). This

Policy	Policy guidance	Policy assessment
	reference should be made to the hazard rating for each site where covered by the Thurrock Strategic Flood Risk Assessment. 3. Development proposals subject to the Exception Test in Thurrock must show that the following criteria have been met (in addition to FRA requirements outlined in the NPPF and associated Planning Practice Guidance): I. In addressing that part of the Exception Test requiring demonstration that the development provides wider sustainability benefits to the community that outweigh flood risk, reference should be made to the main assessment criteria outlined in the Thurrock Sustainability Appraisal and any opportunities to reduce the overall flood risk posed to the community, including schemes to make space for water; II. The FRA must demonstrate that the development will be 'safe', without increasing flood risk elsewhere, and where possible will reduce flood risk overall. For Thurrock, this will mean addressing the following points in particular: i. Flood hazard must be fully considered and reference should be made in the site-specific FRA to the SFRA, or site-specific modelling. This should be used to inform a sequential approach to planning within the site ii. Where it is deemed acceptable to reduce flood storage as a result of development, level for level compensation storage must be provided to ensure that there is no increased flood risk elsewhere iii. Where appropriate, an emergency plan for the development must be submitted that is consistent with the emergency plan for the area. This will include evidence that 'more vulnerable' development can achieve safe access/egress to a communal refuge point	indicates that the majority of the route alignment is in an area of low probability of flooding. For areas of the Project that lie in Flood Zone 3 within Thurrock, these would benefit from existing flood defences as follows: • Adjacent to the River Thames (north). • Near to the Mardyke (main river). The FRA has considered all sources of flood risk, informed by extensive consultation with the Environment Agency and relevant Lead Local Flood Authorities, as well as the results of hydrological and hydraulic modelling of the Mardyke, the Tilbury Main and the influence of the tidal River Thames on the flow regimes of these watercourses. The FRA provides the necessary evidence to satisfy the Sequential and Exception Tests for those areas of the route alignment within Flood Zone 3. Further evidence in support of the Exception Test, regarding the sustainability benefits of the Project, is summarised in the Need for the Project (Application Document 7.1). Incorporation of a suite of flood alleviation measures to prevent increases in flood risk elsewhere includes the provision of compensation storage for any permanent losses of floodplain storage volume associated with the Tilbury Main, Mardyke and Mardyke West tributary. A strategy for managing operational surface water drainage has been prepared centred on the application of Sustainable Drainage Systems (SuDS), appropriate to local conditions. The strategy is summarised in Part 7 of Appendix 14.6: Flood Risk Assessment (Application Document 6.3) of the ES.

Policy	Policy guidance	Policy assessment
	or unaffected area accessible to the emergency services. In highly exceptional cases where access/egress to a place of safe refuge cannot be achieved, these will be considered on their individual merits iv. Where appropriate, flood avoidance, flood resistance and flood resilience measures must be incorporated into the design of any development v. Evidence that surface water management schemes, and other flood defence measures that are required on-site in order to allow a development to take place will be adequately maintained for the lifetime of that development by the site owner vi. Evidence that the proposed development will not interfere with the potential for future maintenance or improvements to flood defences. 5. Developments will be expected to incorporate Sustainable Drainage Systems (SuDS) to reduce the risk of surface water flooding, both to the site in question and to the surrounding area. Where the potential for surface water flooding has been identified, site specific Flood Risk Assessments should ensure that suitable SuDS techniques are incorporated as part of the redevelopment.	

Table C.12 Thurrock Local Plan - Issues & Options (Stages 1 & 2) (December 2016 & 2018)

Policy	Policy Guidance	Policy Assessment
A regulation 18 consultation local plan was issued on 22nd September 22 and is out for public consultation until the 3rd November 2022. As a regulation 18 consultation document it does not contain any draft policies or allocations. The document does, however, include the text opposite regarding the Project:	**"**Lower Thames Crossing The proposed alignment of the Lower Thames Crossing threatens to significantly undermine the efforts of the Council to plan to meet its objectively assessed housing needs in full and to support economic growth and the regeneration of existing local communities. Based on the scheme configuration shown in Figure 14, the Lower Thames Crossing will have an adverse impact on the potential to bring forward sites for development along the length of its route for a number of reasons. These include: • The sterilization of development opportunities in sustainable locations around existing settlements • Poor local connectivity and a failure to explicitly plan and design a scheme with the objective of supporting the delivery of strategic sites for housing and economic growth • The need to mitigate the impact of noise, air quality, severance and flood risk considerations which has led to an increase in land take in locations where future development capacity exists. The areas most affected include: land west of East Tilbury; land north of and east of Chadwell St Mary; land in and around the proposed junction with the A13; and land north and east of South Ockendon. The full extent of these impacts on the availability of land for development will need to be assessed in more detail through the plan-making process and the on-going detailed design work and environmental impact assessment work associated with the Lower Thames	As this regulation 18 consultation plan is at such an early stage in its preparation it can be afforded little, if any, weight in the decision-making process. Accordingly, the Core Strategy constitutes the adopted development plan for Thurrock.

Policy	Policy Guidance	Policy Assessment
	Crossing. The outcome of this work will help inform decisions on whether the identification of broad locations for growth or specific sites for development can be taken forward as development plan allocations. However, at this stage of the process it is questionable as to whether the design and development of the Lower Thames Crossing scheme is being taken forward in a manner which supports future housing and economic growth in both Thurrock, or South Essex as a whole, and in a way which allows local authorities to maximise the investment in new nationally significant infrastructure in planning for growth as set out in the national policy guidance."	

Table C.13 Brentwood Local Plan 2016-2033 (adopted March 2022)

Policy	Policy guidance	Policy assessment
MG02: Green Belt Shortened Policy	A. The Metropolitan Green Belt within Brentwood Borough (as defined in the Brentwood Policies Map) will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions. Planning permission will not be granted for inappropriate development in the Green Belt other than in very special circumstances. • All development proposals within the Green Belt will be considered and assessed in accordance with the provisions of national planning policy. • The Council will seek to enhance the beneficial use of the Green Belt to provide or improve access to it; to provide or enhance opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity and; to improve damaged and derelict land. Development proposals in or adjacent to the Green Belt (including those the subject of allocations in this plan) will be expected to include measures to achieve these objectives so far as it is possible and appropriate.	With the exception of the proposed tunnel link under the River Thames, the Project route passes through Green Belt land. It is acknowledged that the Project constitutes 'inappropriate' development in the Green Belt and therefore the 'very special circumstances' justifying development in the Green Belt have been set out in Chapter 6 of this Planning Statement and Appendix E (Green Belt) The Project does not directly affect Public Rights of Way (PRoW) within the Borough, although seeks to ensure that opportunities for PRoW to be maintained or improved elsewhere along the Project route have been undertaken. Table 13.54 in Chapter 13: Population and Human Health ES (Application Document 6.1) provides details of additional and improved PRoW provision, including that for walkers, cyclists and horse-riders (WCH) north of the River Thames. Chapter 7: Landscape and Visual of the ES (Application Document 6.1) has assessed the impact of the Project on the existing landscape, noting that the Project would inevitably have an impact on the visual landscape, although measures such as false cuttings and Green Infrastructure provision would help to reduce the visual harm as detailed in Figure 2.4: Environmental Masterplan (Application Document 6.2) of the ES. The Design Principles (Application Document 7.5) states that 'The design principles apply to the Project's permanent physical structures (including highways, tunnels and buildings) and landscape works'.

Policy	Policy guidance	Policy assessment
MG06: Local Plan Review and Update Shortened Policy	The Council will bring forward a partial update of the Plan with the objective of meeting the full Objectively Assessed Housing Needs. The review will commence immediately upon the adoption of this Plan with submission of the review for examination within 28 months. Specific matters to be addressed by the update shall include the following (amongst all other matters that need to be assessed and taken into account for the purposes of plan preparation): 1. A review of transport and highway issues to cater for local plan growth throughout the period of the review (in consultation with National Highways and Essex County Council) taking into account: • the optimisation of existing, and the introduction of further, sustainable transport measures where appropriate along with the need to provide improvements to and around: - A12 junction 12 - M25 Junction 28 - M25 junction 29;	The Transport Assessment (Application Document 7.9) has demonstrated how the Project is forecast to reduce congestion, increase capacity across the River Thames, provide new and improved connections for communities to the north and south of the River Thames and promote further employment opportunities and economic growth for affected communities and the wider area. The Project would provide a faster and more direct route from the M25 to the M2, therefore, reducing the need for travellers to use local roads.
BE01: Carbon Reduction and Renewable Energy	1. Carbon Reduction and Construction Standards Development should meet the minimum standards of sustainable construction and carbon reduction as set out below: • All major development will be required to achieve at least a 10% reduction in carbon dioxide emissions above the requirements of Part L Building Regulations • New Non-residential development will be required to achieve a certified 'Excellent' rating under the BREEAM New Construction (Non-Domestic	Chapter 15 of the Environmental Statement (Application Document 6.1) assesses the potential 'worst case scenario' impacts of the Project on Greenhouse Gas Emissions and climate change. It is supported by a Carbon and Energy Plan (Application Document 7.19). This Plan quantifies the likely carbon emissions generated by the project and methods for reducing them and sets out how the Project would contribute to the UK's net zero carbon goal. It shows how the Applicant has acted to reduce emissions by including mitigation measures embedded in the preliminary design and by embedding carbon reductions in the construction stage through the

Policy	Policy guidance	Policy assessment
	Buildings) 2018 scheme, or other equivalent standards. The version of BREEAM that a building must be assessed under should be the latest BREEAM scheme and not be based on scheme versions that have been registered under at the pre-planning stages of a project. Other construction standards, such as LEEDs or Passivhaus, will be supported provided that they are broadly at least in line with the standards set out above. Renewable Energy Wherever possible, application of major development will be required to provide a minimum of 10% of the predicted energy needs of the development from renewable energy. Where on-site provision of renewable technologies is not appropriate, or where it is clearly demonstrated that the above target cannot be fully achieved on-site, any shortfall should be provided through: • 'allowable solutions contributions' via Section 106 or CIL. These funds will then be used for energy efficiency and energy generation initiatives or other measure(s) required to offset the environmental impact of the development • off-site provision, provided that an alternative proposal is identified, and the measures can be secured. Application of major development, including proposals involving the redevelopment of existing floor space, should be accompanied by a Sustainability Statement outlining their approach to the following issues: • adaptation to climate change • carbon reduction	procurement process to ensure that the Contractors are contractually bound to comply with relevant commitments made as part of this application. These measures and an explanation of how they would be secured through the REAC (Section 7 of the CoCP, Application Document 6.3) are set out in Section 3 of the Carbon & Energy Plan. Chapter 15 Climate of the ES (Application Document 6.1) identifies that, when GHG emissions from the Project would be at their highest, most intense level (short-term construction activity), the Project would contribute no more than 0.06% of total emissions in any five-year carbon budget during which they arise. Accordingly, it is concluded that the GHG impact of the Project would not have a material impact on carbon reduction targets as set by the UK Government and is therefore not significant. To ensure the effective monitoring of air quality and noise during the construction phase, monitoring equipment would be placed in locations to be agreed through specific requirements within Schedule 2 of the draft Development Consent Order (dDCO) (Application Document 3.1) in consultation with the relevant local authorities.

Policy	Policy guidance	Policy assessment
	• water management • site waste management • use of materials Where it is not possible to meet these standards, applicants must demonstrate compelling reasons and provide evidence, as to why achieving the sustainability standards would not be technically feasible or economically viable.	
BE02: Water Efficiency and Management Shortened Policy	**Waste Water and Sewage** 2. Development proposals should: • seek to improve the water environment and demonstrate that adequate wastewater infrastructure capacity is provided • ensure that misconnections between foul and surface water networks are eliminated and not easily created through future building alterations 3. Applications will need to demonstrate that the sewerage network has adequate capacity both on and off-site to serve the development and to assess the need to contribute to any additional connections for the development to prevent flooding or pollution of land and water courses. Where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development. **Water Quality** 4. All development proposals should have regard to the Water Cycle Study and: • seek to improve water quality • not cause deterioration in the quality of a water course or groundwater	Chapter 6 of this Planning Statement outlines in the Water Quality and Resources section that taking into account project design and mitigation that there would be no likely significant adverse effects on water environment receptors. This conclusion is based on evidence in the form of the following: • Water Features Survey (Appendix 14.2 of the ES (Application Document 6.3) • Hydromorphology Assessment (Appendix 14.1 of the ES (Application Document 6.3) • Hydrogeological Risk Assessment (Appendix 14.5 of the ES (Application Document 6.3) • Stage 4 Water Framework Directive Assessment (Appendix 14.7 of the ES (Application Document 6.3) The WFD Assessment has concluded, taking into account measures embedded in the Project design, in combination with commitments to methods of construction and compound management which are documented in the CoCP (Appendix 2.2, Application Document 6.3) which would prevent or mitigate potential effects on surface, transitional or groundwater bodies, that there would be no

Policy	Policy guidance	Policy assessment
	• not lead to adverse impacts on the natural functioning of the watercourse, including quantity, flow, river continuity, groundwater connectivity, or biodiversity impacts • where development is likely to have an impact, proposals must set out how impacts will be mitigated.	deterioration of biological quality, hydromorphology, physicochemical or specific pollutant supporting elements at the surface water body scale, at which WFD ES Appendix 14.7 (Application Document 6.3) compliance is judged. In addition, the Project would not prevent the future attainment of the WFD objectives for each of the respective water bodies, nor pose barriers to implementing future measures described in the River Basin Management Plans to achieve these objectives.
BE05: Sustainable Drainage Shortened Policy	1. All developments should incorporate appropriate Sustainable Drainage Systems (SuDS) for the disposal of surface water, in order to avoid any increase in surface water flood risk or adverse impact on water quality. Applicants are required to submit a surface water Drainage Strategy and a Flood Risk Assessment for all major development as well as for all development within a Critical Drainage Area. The Drainage Strategy must include a SuDs Management Plan setting out the long-term management and maintenance arrangements. SuDs will be required to meet the following design criteria: • the design must follow an index-based approach when managing water quality. Implementation in line with the updated CIRIA SuDS Manual18 is required. Source control techniques such as green roofs, permeable paving and swales should be used so that rainfall runoff in events up to 5mm does not leave the site • SuDS should be sensitively designed and integrated into the Green and Blue infrastructure to create high quality public open space and	With Chapter 6 of this Planning Statement, a strategy for managing operational surface water drainage has been prepared centred on the application of Sustainable Drainage Systems (SuDS), appropriate to local conditions. The strategy is summarised in Part 7 of Appendix 14.6: Flood Risk Assessment of the ES (Application Document 6.3).

Policy	Policy guidance	Policy assessment
	landscaped public realm, in line with Strategic Policy NE02: Green and Blue Infrastructure • maximise opportunities to enhance biodiversity net gain • improve the quality of water discharges and be used in conjunction with water use efficiency measures • function effectively over the lifetime of the development • the preferred hierarchy of managing surface water drainage from any development is through infiltration measures, secondly attenuation and discharge to watercourses, and if these cannot be met, through discharge to surface water only sewers • have regard to Essex County Council SuDS Design Guide 2020, or as amended 6. When discharging surface water to a public sewer, developers will be required to provide evidence that capacity exists in the public sewerage network to serve their development, in line with policy requirements in BE02 Water Efficiency and Management. 7. Development proposals should be designed to include permeable surfaces wherever possible. Proposals for impermeable paving, including on small surfaces such as front gardens and driveways, will be strongly resisted unless it can be suitably demonstrated that this is not technically feasible or appropriate.	
BE09: Sustainable Means of Travel and Walkable Streets Shortened Policy	Sustainable modes of transport should be prioritised in new developments to promote accessibility and integration with the wider community and existing	As the proposed route alignment through the Borough relates largely to improvements to M25 junction 29, no provision has been made for improved cycling facilities within this short section of highway works.

Policy	Policy guidance	Policy assessment
	networks. Priority should be given to cycle and pedestrian movements and access to public transport. Development proposals should provide the following sustainable measures as appropriate: • the provision of pedestrian, cycle, public transport and where appropriate, bridleway connections within development sites and to the wider area, including key destinations • the creation of safe, secure, well connected and attractive layouts which minimise the conflicts between traffic, cyclists and pedestrians, and allow good accessibility for passenger transport within sites and between sites and adjacent areas, and where appropriate improve areas where passenger transport, pedestrian or cycle movement is difficult or dangerous • safeguarding existing and proposed routes for walking, cycling, and public transport, from development that would prejudice their continued use and/or development;	However, within other areas of the Project route, cycleway provision is being provided with improvements to existing footpaths and bridleways to accommodate cyclists and pedestrians, as set out in the Transport Assessment (Application Document 7.9) and Chapter 13: Population and Human Health of the Environmental Statement (ES) (Application Document 6.1). Matters of layout and design are explained in the Project Design report (Application Document 7.4) which also identifies the net benefits the Project will provide in terms of new provision for WCH as compensation significantly above the extent of losses incurred in constructing the Project. Application Document 7.9: Transport Assessment includes a safety review of the Project at section 5.6.
BE10: Sustainable Passenger Transport Shortened Policy	The Council will facilitate and support sustainable passenger transport services operating in Brentwood to help deliver the vision of the Local Plan. Development proposals should protect and enhance existing passenger transport and their capacity	The Transport Assessment (Application Document 7.9) provides an assessment of the impacts of the Project on railways, waterways and canals, bus and coach networks and networks for WCH through both the construction and operation of the Project. The Project delivers net additional provision in terms of the WCH network and the conclusion on the rail and bus/coach networks is that there will be no major adverse impacts on bus services and no impact on rail services once the Project is operational (there will be some temporary impacts on the rail network during construction). See the conclusion of the TA (Application Document 7.9).

Policy	Policy guidance	Policy assessment
Policy BE11: Electric and Low Emission Vehicles	All development proposals should wherever possible maximise the opportunity of occupiers and visitors to use electric and low emission vehicles, and maximise the provision of electric vehicle charging / plug-in points and/or the space and infrastructure required to provide them in the future.	As noted in the supporting text to the Policy (paragraph 5.101), National Highways has plans to install charging infrastructure every 20 miles along the major road network as part of its Road Investment Strategy. Therefore, it is being addressed at a national level as part of the RIS but also through National Highways' Transport Decarbonisation Plan and the Net Zero Highways Plan. With specific regard to the impacts of the Project, Application Document 7.19: Carbon and Energy Management Plan explains how the Applicant has designated the Project as a 'pathfinder' for low carbon construction and set the following ambitions: • To construct it for the lowest practicable carbon emissions • To test low carbon innovation and approaches • To leave a legacy that enables future projects to decarbonise, in line with National Highways' ambition for net zero construction emissions by 2040. These strategic commitments are supported by specific commitments made in the REAC on air quality and climate change which seek to minimise and mitigate vehicle emissions via a variety of measures (eg AQ001: Vehicle and Plant Emissions).
Policy BE12: Mitigating the Transport Impacts of Development	Developments must not have an unacceptable impact on the transport network in terms of highway safety, capacity and congestion. New development proposals will be required to be supported by: • Travel Plans, Transport Assessments and/or Statements in accordance with the thresholds and	Section 10 of the TA (Application Document 7.9) addresses the management of impacts both during construction and operation of the Project. Section 9 deals with road safety. The TA is also supported by an outline Traffic Management Plan for Construction (Application Document 7.14, a Framework Construction Travel Plan (Application Document 7.13)

Policy	Policy guidance	Policy assessment
	detailed requirements for each land use category as set out in the Essex County Council's Development Management Policies or its successors; and engage in an appropriate and proportionate assessment process with National Highways where development has a likelihood to have a material impact on the Strategic Road Network which is not otherwise catered for by programmed works or improvements • where necessary, reasonable and proportionate financial contributions and/or take reasonable measures to: - mitigate the cumulative transport impact of the development to an acceptable degree, including relevant highways measures identified in the IDP Part B - accommodate the use of sustainable modes of transport including borough-wide sustainable transport measures identified in the IDP Part B, investment in infrastructure, services, Low Emission Zone, or measures to promote behavioural change (including enforcement).	and a Wider Network Impacts Management and Monitoring Plan (Application Document 7.12) The Wider Network Impacts Management and Monitoring Plan (Application Document 7.12) would be implemented to monitor the impacts of the Project on the wider network and actively engage with local authorities to address these impacts. The provision of electric charging points on the strategic road network is being addressed as part of the at a national level through the Transport Decarbonisation Plan and National Highways' Net Zero Highways Plan. There are also requirements in the dDCO for the production of site travel plans for the works compounds and Utility Logistics Hubs which are secured through requirements 10 and 11 in Part 1 of Schedule 2 of the dDCO (Application Document 3.1)
BE14: Creating Successful Places Shortened Policy	1. Proposals will be required to meet high design standards and deliver safe, inclusive, attractive and accessible places. Proposals should: • provide a comprehensive design approach that delivers a high quality, safe, attractive, inclusive, durable and healthy places in which to live and work • make efficient use of land and infrastructure	Chapter 6 of this Planning Statement provides a section on land use. Application Document 7.4 comprises a Project Design Report with Parts D2 and D3 covering those parts of the Project between the North Portal and the A13 and the A13 and the M25 respectively. The report has been prepared to demonstrate compliance with paragraphs 4.28-4.35 of the NPSNN which set out the criteria for 'good design' for national networks infrastructure projects noting that achieving good design outcomes design should be an integral

Policy	Policy guidance	Policy assessment
	• deliver sustainable buildings, places and spaces that can adapt to changing social technological, economic, environmental and climate conditions • create permeable, accessible and multifunctional streets and places that promotes active lifestyles • respond positively and sympathetically to their context and build upon existing strengths and characteristics, and where appropriate, retain or enhance existing features which make a positive contribution to the character, appearance or significance of the local area (including natural and heritage assets) • integrate and enhance the natural environment by the inclusion of features which will endure for the life of the development, such as planting to enhance biodiversity, the provision of green roofs, green walls and nature based sustainable drainage • mitigate the impact of air, noise, vibration and light pollution from internal and external sources, especially in intrinsically dark landscapes and residential areas. Development proposals should be supported by a statement setting out the sustainable long-term governance and stewardship arrangements for the maintenance of supporting infrastructure including community assets, and open spaces; the statement should be proportionate to the scale of the scheme and quantum of infrastructure being delivered.	consideration from the outset. These principles and the detail contained in the Project Design Report match those contained in this local plan policy.
BE16: Conservation and Enhancement of Historic Environment	A. All Designated Assets Great weight will be given to the preservation of a designated heritage asset and its setting. Development proposals affecting a designated asset, including a	ES Chapter 6: Cultural Heritage (Application Document 6.1) sets out the effects of the project during the construction and operation on cultural heritage.

Policy	Policy guidance	Policy assessment
	listed building, conservation area, registered parks and gardens, or scheduled monument, will be required to: • sustain and wherever possible enhance the significance of the assets and its settings (including views into and out of conservation areas and their settings) • be supported by a Heritage Statement providing sufficient information on the significance of the heritage asset (according to its importance), the potential impacts of the proposal on the character and significance of the asset and its setting, and how the proposal has been designed to take these factors into account. The Statement should make an assessment of the impact of the development on the asset and its setting and the level of harm that is likely to result, if any, from the proposed development • provide clear justification for any works that would lead to any harm to the asset. Proposals that make sensitive and appropriate use of heritage assets, particularly where these bring redundant or under used buildings or buildings on the At Risk Register, into appropriate use consistent with their conservation status will be supported. Proposals designed to enhance an asset and/or its setting and which reinforce its significance and contribution to the character of an area will be supported. Development proposals that would be likely to cause either less than substantial or substantial harm to, or loss or partial loss of, a designated asset or its setting will be assessed in accordance with the statutory framework and national planning policy.	Mitigation has been proposed to avoid, reduce or compensate for adverse impacts to heritage assets. In line with Requirement 9 of the dDCO (Application Document 3.1) mitigation in terms of evaluation and recording of archaeological assets would be undertaken. The ES concludes that the Project would have construction and operational effects on archaeological remains, built heritage, historic landscapes and the paleoenvironmental and geoarchaeological resource. The Assessment of effects on cultural heritage has identified substantial harm to heritage assets however this would be outweighed by the substantial public benefits of the project, as set out in detail in the Need for the Project (Application Document 7.1).

Policy	Policy guidance	Policy assessment
	Where a proposed development involves the loss or partial loss of a designated asset, applicants will be required to record and advance understanding of the asset in a manner proportionate to its importance and the impact which will be caused. B. Conservation Areas In addition to satisfying the relevant criteria in A above: 1. Permission for proposals which involve the demolition or partial demolition of a building in a conservation area will only be granted subject to a condition and/or a planning obligation (as appropriate) that no demolition will take place until an enforceable contract has been let for the carrying out of the new development. 2. Development will be permitted in a conservation area where the siting, design and scale of the proposed development would preserve or enhance its character or appearance and important views into and out of the area are preserved or enhanced. C. Non-Designated Heritage Assets Development proposals that affect non-designated heritage assets and their settings, including protected lanes, should seek to preserve and wherever possible enhance the asset and its setting. When considering proposals which are likely to cause harm to such an asset consideration will be given to: • the significance of the asset and its setting • the extent to which the scale of any harm or loss harm has been minimised. D. Specific Requirements Specific requirements in relation to particular heritage assets identified in housing allocation policies should be	

Policy	Policy guidance	Policy assessment
	read alongside the overarching requirements of this policy.	
NE01: Protecting and Enhancing the Natural Environment Shortened Policy	The Council will require development proposals to use natural resources prudently and protect and enhance the quality of the natural environment. All proposals should, wherever possible, incorporate measures to secure a net gain in biodiversity, protect and enhance the network of habitats, species and sites (both statutory and non-statutory) and avoid negative impacts on biodiversity and geodiversity. Compensatory measures will only be considered if it is not possible fully to mitigate any impacts. When determining planning applications, the council will apply the principles relevant to habitats and biodiversity as set out in National Planning Policy. International Designated Sites 3. Where a proposed development is likely to have an adverse impact on European Designated Site (whether individually or in combination with other plans or proposals) permission will not be granted unless there is due compliance with the requirements of the Habitats Regulations. Nationally Designated Sites 5. Development proposals within or outside a SSSI, likely to have an adverse effect on a SSSI (either individually or in combination with other developments), will not be permitted unless, exceptionally, the benefits of the proposed development clearly outweigh both the adverse impacts on the features of the site that make it of national importance and any impacts on the wider network of SSSIs. Sites of Local Importance	ES Chapter 7: Landscape and Visual (Application Document 6.1) sets out the effects of the project during the construction and operation on national and local landscape designations. The ES concludes that although there would be some very large and large adverse effects arising from the Project, these would be localised due to extensive mitigation proposals which would help screen views of the new road and reinstate landscape features removed to facilitate construction. For the most part, effects of the Project would be moderate or below. It is therefore concluded that the Project would result in a combined moderate adverse significance of overall landscape and visual effect on the existing landscape and visual amenity, which is considered significant in the context of the EIA Regulations. Chapter 8: Terrestrial Biodiversity of the ES (Application Document 6.1) sets out the effects of the project, during both construction and operation, upon international, national and locally designated sites, protected species and habitats, along with other species identified as being of principal importance for the conservation of biodiversity. The project has been designed to maximise opportunities to conserve and enhance biodiversity. Section 8.5 of Chapter 8 explains the embedded design and mitigation measures which form part of the Project. The route corridor has been designed to be a biodiverse wildlife corridor connecting suitable habitats throughout the wider landscape (secured through Clause no.PLA.05 the Design Principles (Application Document 7.4) and dDCO Requirement 4

Policy	Policy guidance	Policy assessment
	6. Development proposals that are likely adversely to affect locally designated sites, including their functional status within any identified ecological network, will only be permitted where the applicant can demonstrate that: • the ecological coherence of the site and any local ecological network is maintained • it can be demonstrated that the benefits of the development clearly outweigh the loss.	(Application Document 3.1)). In particular, biodiversity connectivity would be maintained through the introduction of seven crossings of the Project in the form of green bridges. Following the Local Refinements Consultation carried out in May and June 2022, additional environmental compensation and mitigation measures were incorporated into the development design. Whilst the construction of the Lower Thames Crossing would have no significant impact on nitrogen deposition, precautionary assessments have found that there would be a risk of significant nitrogen deposition effects from its operation. These are detailed in Appendix 8.14: Designated Sites Air Quality Assessment and Appendix 5.6: Project Air Quality Action Plan of the ES (Application Document 6.3) and includes sites to compensate for the effects of nitrogen deposition. ES Appendix 8.21(Application Document 6.3): Biodiversity Metric Calculations presents the results of the Biodiversity Metric calculations to support the ES. The Project design has sought to maximise benefits for biodiversity through new areas of habitat and landscape creation proposed as part of the project and against the benefits of the Project as a whole (outlined in Application Document 7.1 Need for the Project and 7.20 Benefits and Outcomes document).
NE02: Green and Blue Infrastructure	1. Brentwood's network of green and blue infrastructure (GBI) will be protected, enhanced and managed to provide a multi-functional, high quality open space resource, capable of delivering opportunities for recreation, health and wellbeing, ecological connectivity, biodiversity net-gain as well as wider ecosystem services for climate change adaptation.	Green Infrastructure is assessed in Chapter 5 of this statement and also within Appendix H. The assessment is found in Appendix E on the Green Belt. ES Chapter 10 Geology and Soils and ES Chapter 11 Materials (Application Document 6.1) consider the impact of the project on the Best and Most Versatile Agricultural Land and the safeguarding of minerals

Policy	Policy guidance	Policy assessment
	2. New development is expected, where possible and appropriate, to maximise opportunities to enhance or restore existing GBI provision and/or create new provision on site that connects to the wider GBI network. Its design and management should also respect and enhance the character and distinctiveness of the local area. 3. Developments on sites containing or are adjacent to a water course or water body (Blue Infrastructure) are required to ensure there is no adverse impact on the functioning or water quality of the Blue Infrastructure. Proposals that maximise opportunities to enhance or restore Blue Infrastructure and incorporate these features into the public realm of the development will be supported. An adequate undeveloped buffer zone should be applied as necessary to mitigate flood risk, in line with Policy NE09 and/or support sustainable drainage, in line with Policy BE05. 4. Proposals should provide appropriate specification and maintenance plans for the proposed green and blue infrastructure throughout the life of the development.	respectively. Together these assessments conclude that in terms of impacts on Green Belt, open space, GI, soil quality, contamination, minerals safeguarding and Best and Most Versatile Agricultural Land, while there are acknowledged impacts as described above, overall, the net benefit delivered by the Project are considered to outweigh any adverse impacts as articulated in the Planning Balance Chapter 8 of the Planning Statement.
NE03: Trees, Woodlands, Hedgerows	Development proposals that would result in the deterioration or loss of irreplaceable ancient woodland and ancient and veteran trees will not be permitted other than in wholly exceptional circumstances and only if the proposals include a suitable compensation strategy. Applicants will need to demonstrate the efficacy of the strategy by reference to the value of the habitats that will be lost or harmed and provide an appropriate implementation and maintenance programme to underpin the strategy the performance of which will be subject of a condition and/or planning obligation, as appropriate.	ES Chapter 7: Landscape and Visual (Application Document 6.1) sets out that an Arboricultural Method Statement and Tree Protection Plan would be prepared in accordance with BS 5836:2012 identifying measures for the protection of retained trees and woodland prior to the commencement of site clearance works (See Table 7.12 ES Chapter 7 Landscape and Visual (REAC measure TB002)) Protection of ancient trees, ancient woodland and veteran trees from dust and pollution (See Table 7.14

Policy	Policy guidance	Policy assessment
	In all other cases, proposals should, so far as possible and practicable, seek to retain existing trees, woodlands and hedgerows where they make a positive contribution to the local landscape and/or biodiversity or which have significant amenity value. Wherever possible and appropriate, landscaping schemes should take account of and incorporate these existing features in the scheme and where any loss is unavoidable, incorporate measures to compensate for their loss.	ES Chapter 7 Landscape and Visual (REAC measure LV030)) Hulks of felled veteran trees would be relocated in close proximity to a nearby veteran tree, woodland or parkland area. (See Table 7.14 ES Chapter 7 Landscape and Visual (REAC measure LV030)) A minimum of 30 individual specimen trees would be planted as a replacement for the lost veteran trees (See Table 7.14 ES Chapter 7 Landscape and Visual (REAC measure LV032)).
NE04: Thames Chase Community Forest	Development proposals which fall within the Thames Chase Community Forest Area should not prejudice the implementation, aims and objectives of the Thames Chase Plan.	The Project route passes through the Thames Chase Community Forest. Chapter 7: Landscape and Visual of the Environmental Statement (ES) (Application Document 6.1) provides for the following mitigation measures: • A walking, cycling and horse riding (WCH) route over the proposed bridge structure with improved WCH access at Thames Chase – Thames Chase Community Forest • A127 WCH route and new overbridge • Species-rich/wildflower grassland typically planted on proposed earthworks and immediately adjacent to the Project route • Woodland planting of typically native species (with some climate change–adapting species) at the A122 Lower Thames Crossing/M25 junction and on proposed earthworks within Thames Chase Community Forest. This also includes ancient woodland compensation planting adjacent to existing woodland features throughout this section to reinforce landscape pattern and features and aid visual screening

Policy	Policy guidance	Policy assessment
		• Shrub/scrub planting of typically native species (with some climate change–adapting species) planted in combination with woodland planting features on proposed earthworks to aid landscape integration and visual screening • Native hedgerows typically planted adjacent to proposed earthworks to restore field pattern and landscape features and aid visual screening • Specimen/individual trees and scattered trees typically planted alongside the Project route within this section • Wetland planting associated with waterways and water bodies Tables 7.11 and 7.15 of Chapter 7 of the ES (Application Document 6.1) sets out, in detail, mitigation measures proposed for the Thames Chase Community Forest area. These measures are secured through the EMP (ES Figure 2.4, Application Document 6.2) under Requirement 4 of the dDCO (Application Document 3.1).
NE08: Air Quality	Development is required to meet national air quality standards and identify opportunities to improve air quality or mitigate local exceedances and impacts to acceptable legal and safe levels. Development proposals must demonstrate that they will not: • Compromise the achievement of compliance targets within Air Quality Management Areas (AQMAs) • Create new exceedance areas • Create unacceptable risk of high levels of exposure to poor air quality, particularly where development is near to, or promotes land uses to be used by	The impact the project would have upon air quality is addressed within Chapter 5: Air Quality of the ES (Application Document 6.1). The Air Quality Assessment concludes that the construction and operation of the Project would not give rise to unacceptably harmful impacts on human health. Residual air quality impacts upon ecological receptors would be offset by the proposed compensatory habitats which have been included within the order limits. The air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the Project have been assessed and the Project

Policy	Policy guidance	Policy assessment
	those particularly vulnerable to poor air quality (such as children and older adults). Development proposals should be designed to minimise exposure to existing poor air quality and make appropriate provisions to improve local air quality conditions through design solutions and measures to the outdoor and indoor environment. Particular attention should be given to the positioning, layout and design of proposals for new build developments and community infrastructure (indoor and outdoor) that are likely to be used by large volumes of people on a daily basis, especially by vulnerable groups. Community infrastructure should, where possible incorporate appropriate buffer zones to prevent or minimise exposure to air pollution sources. An Air Quality Impact Assessment is required as part of any planning application for: • major developments • employment led developments • developments which will require substantial earthworks or demolition • developments which include community infrastructure including leisure, education and health facilities or open space (including child play space) • new build developments in areas along busy or congested road and rail lines where residents will be exposed to poor air quality • developments which propose the use of Combined Heat and Power, biomass boilers or similar solutions that might impact air quality • new developments within AQMAs.	would not affect the UKs ability to comply with the Air Quality Directive.

Policy	Policy guidance	Policy assessment
	4. Development proposals should have regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of (A) and (B) above will be resisted unless appropriate measures are implemented to ensure adverse impacts can be mitigated to an acceptable level. Mitigation should be provided onsite unless it can be demonstrated that it is inappropriate and that off-site provision will deliver equivalent or wider benefits.	
NE09: Flood Risk Shortened Policy	New development will be required to avoid areas of flood risk by applying the Sequential and, where necessary, the Exception Tests in accordance with national policy and guidance. A site specific Flood Risk Assessment must assess all sources of flooding. It should demonstrate how flood risk will be managed over the development's lifetime, taking climate change into account. A site specific FRA is required, in accordance with national policy guidance, for the following types of development: • all new development greater than 1 ha in size in Flood Zone 1 • all development within a Critical Drainage Area • all new development (including minor development and change of use) in flood zones 2 and 3 • new development or a change of use to a more vulnerable class which may be subject to other sources of flooding. • 3. Where proposals satisfy the Sequential and Exception Tests design proposals should ensure that: • the most vulnerable land uses are located in areas within the site that are at lowest risk of flooding	A Flood Risk Assessment has been undertaken (ES Appendix 14.6, Application Document 6.3). Flood risk has been appropriately assessed against the relevant guidance with input from all relevant stakeholders; where appropriate the Sequential and Exception Tests have been passed so justifying parts of the Project being located in higher flood risk zones; where risk impacts have been identified, appropriate mitigation measures are either incorporated within the design of the Project or otherwise proposed to ensure to address this risk and ensure that the Project would be delivered in a safe and sustainable manner.

Policy	Policy guidance	Policy assessment
	• development will be safe for its lifetime taking account of the vulnerability of its users, • flood risk will not increase elsewhere • development would not constrain the natural function of the flood plain, either by impeding flow or reducing storage capacity • development is constructed so as to remain operational even at times of flood through resistant and resilient design • appropriate mitigation measures are incorporated to address any residual flood risk safely, including safe access and egress for all likely users of the development • where necessary incorporate flood resistant and flood resilient design measures such that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment • incorporate sustainable drainage systems in line with Policy BE05 Sustainable Drainage, unless there is clear evidence that this would be inappropriate • where possible, the development will reduce flood risk overall. • safe access and escape routes are included where appropriate, as part of an agreed Emergency Response Plan, where required.	
NE10: Contaminated Land and Hazardous Substances Shortened Policy	Contaminated Land Planning permission will only be granted for development on, or near to land which is suspected to be contaminated, where the Council is satisfied that:	Chapter 10: Geology and Soils of the Environmental Statement (Application Document 6.1) has identified areas of contamination risk along the Project route through desk-based research and intrusive ground investigation. The assessment has shown that within

Policy	Policy guidance	Policy assessment
	• any risks, including to human health and the environment, can be adequately addressed in order to make the development safe • there will be no adverse impact on the environment and quality of local groundwater or quality of surface water. Proposed development on or near known or potentially contaminated land will be required to submit a Phase 1 Preliminary Risk Assessment to identify the level and type of risk and, where necessary: • undertake a Phase 2 Intrusive Site Investigation to provide a detailed assessment of contamination and risks to all receptors • prepare a Remediation Statement providing details of a remediation scheme appropriate to the individual site • submit a Validation Report prior to the construction of the development	the Borough, the section of the Project route joining the M25 has a low risk of contamination and therefore no mitigation measures are proposed for land within the Borough.
NE11: Floodlighting and Illumination	Development proposals involving floodlighting or any other means of illumination (other than advertisements) will only be permitted where the scheme: • is appropriate for the intended use and has been appropriately designed to prevent light spillage • is energy efficient • provides the minimum level of light necessary to achieve its purpose • uses an appropriate light spectrum and specification that will not be harmful to nocturnal wildlife or human health • does not impact unacceptably on the night sky or give rise to any unacceptable increase in sky glow;	Lighting would be designed in accordance with relevant highway and transport guidance and would be designed to reduce light spill and pollution. Chapter 7: Landscape and Visual of the Environmental Statement (ES) (Application Document 6.1) provides details of the lighting to be used along the Project route. The Landscape and Visual Assessment within Chapter 7 of the ES complies with the Institution of Lighting Professional's (2020) Guidance Notes on the Reduction of Obtrusive Light – Guidance Note 01/20 with respect to light pollution effects and impacts on landscape character and visual amenity. Mitigation measures to reduce the impact of light pollution

Policy	Policy guidance	Policy assessment
	and ensures the appearance and design of the installation when unlit is sympathetic to the character and design of the development of which it forms part and will when lit have no unacceptable adverse effect on visual amenity, highway safety, landscape or the historic character of the area. Applicants will need to submit a full lighting strategy, proportionate to their application, specifying details of external lighting, its power and type, the overall level and distribution of illumination and times of operation. Appropriate conditions will be imposed to restrict lighting levels and hours of use or require measures to be taken to minimise adverse effects where reasonably necessary.	include reduced lighting column heights and the use of LED luminaires to reduce light spill. The design of lighting detailed in the mitigation measures provided within Chapter 7 of the ES would ensure that lighting intrusion would be acceptable and would be secured through the Register of Environmental Actions and Commitments (REAC) (Application Document 6.3, Appendix 2.2 of the ES).
E11: Brentwood Enterprise Park	Land south east of M25 Junction 29 is allocated for around 25.85 ha of land for employment development (principally for offices, light industrial and research and development, B2 and B8 and other sui generis employment uses). Other ancillary supporting development within classes C1, E and F1 or other sui generis ancillary supporting development may be permitted as a means of supporting these principal employment uses. 1. Development Principles Proposals should: • be accompanied by a high quality landscaping scheme (including a scheme of maintenance) for the site as a whole with the objective also to provide improved visual amenity between the site and adjoining Green Belt • be of a high quality in terms of its design and layout to reflect its status as a key gateway site	The Project Order Limits abut the boundary of this allocation at its north-west corner at the on-slip to junction 29 of the M25 from the A127. The Project would not materially affect the implementation of the allocation nor achievement of any of the development principles listed in the policy.

Policy	Policy guidance	Policy assessment
	• protect and where possible enhance the adjoining Local Wildlife Site (Hobbs Hole) • preserve and where possible enhance the Public Right of Way through the site. 2. Infrastructure Requirements Proposals should provide: • access via M25 Junction 29 and/or Warley Street (B186) and associated slip roads • well-connected internal road layouts which allows good accessibility for bus services • new public transport or Demand Responsive Travel links with the surrounding area • good walking and cycling connections within the site and to the surrounding area. 3. Infrastructure Contributions Applicants will also be required to make necessary financial contributions via planning obligations towards: • off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the Junction 29 mitigation and A127/B186 works, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate; phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.	

Table C.14 Essex Minerals Local Plan (July 2014)

Policy	Policy guidance	Policy assessment
Policy S2: Strategic priorities for minerals development Shortened Policy	The strategic priorities for minerals development are focused primarily on meeting the mineral supply needs of Essex whilst achieving sustainable development. The strategy will promote this by: 3. Reducing the quantity of minerals used and waste generated through appropriate design and procurement, good practices and encouraging the re-use and the recycling of construction materials containing minerals, 5. Safeguarding mineral resources of national and local importance, mineral transhipment sites, Strategic Aggregate Recycling facilities and coated roadstone plants, so that non-minerals development does not sterilise or compromise mineral resources and mineral supply facilities.	The Mineral Safeguarding Assessment Report (ES Appendix 11.2, Application Document 6.3) has evaluated the likely impact on reserves within MSAs Table 11.11 of ES Chapter 11 (Application Document 6.1) provides details on the likely impact on safeguarded minerals within the permanent acquisition land area. See also response to Policy S8 below.
Policy S4: Reducing the use of mineral resources	All development proposals shall ensure that mineral waste is minimised and that minerals on development/ redevelopment sites are re-used and recycled. This is to ensure both a reduction in the need for primary minerals and the amount of 46 construction, demolition, and excavation wastes going to landfill. This will be supported by joint working with strategic partners to ensure: 1. The use of best practice in the extraction, processing and transportation of primary minerals to minimise mineral waste, 2. The application of national and local standards for sustainable design and construction in proposed development,	Section 11.5 of Chapter 11 (Materials and Waste) of the ES (Application Document 6.3) and Appendix 11.1 (Excavated Materials Assessment) outline how the proposed arrangements have sought to minimise both the volume of waste produced and the volume sent for disposal. The Excavated Materials Assessment estimates that the project would generate approximately 12.35 million m3 of uncontaminated inert ground materials (paragraph 2.1.6). 11.18 million m3 (i.e. the vast majority) of that would be reused and recovered within the Project design (paragraph 2.1.9). Having applied the principles of designing out waste and increasing the reuse and recovery of materials within the design proposals, calculations indicate that there would be a net surplus of approximately 500,000m3

Policy	Policy guidance	Policy assessment
	3. The application of procurement policies which promote sustainable design and construction in proposed development, and 4. The maximum possible recovery of minerals from construction, demolition and excavation wastes produced at development or redevelopment sites. This will be promoted by on-site re-use/ recycling, or if not environmentally acceptable to do so, through re-use/ recycling at other nearby aggregate recycling facilities in proximity to the site.	of excavated materials which are anticipated to be split equally between excavations north of the river (paragraph 2.1.30). The assessment demonstrates that there is sufficient capacity beyond the Order Limits to accept these waste arisings even taking into account the temporal ebbs and flows in waste generation as the project progresses.
Policy S8– Safeguarding mineral resources and mineral reserves	By applying Mineral Safeguarding Areas (MSA) and/or Mineral Consultation Areas (MCA), the Mineral Planning Authority will safeguard mineral resources of national and local importance from surface development that would sterilise a significant economic resource or prejudice the effective working of a permitted mineral reserve, Preferred or Reserve Site allocation within the Minerals Local Plan. The Minerals Planning Authority shall be consulted, and its views taken into account on proposed developments within MSAs and MCAs except for the excluded development identified in Appendix 5. Mineral Safeguarding Areas Mineral Safeguarding Areas are designated for mineral deposits of sand and gravel, silica sand, chalk, brickearth and brick clay considered to be of national and local importance, as defined on the Policies Map. The Mineral Planning Authority shall be consulted on: • all planning applications for development on a site located within an MSA that is 5ha or more for sand and gravel, 3ha or more for chalk and greater than 1 dwelling for brickearth or brick clay	A Mineral Safeguarding Assessment Report (ES Appendix 11.2, (Application Document 6.3)) has been prepared to assess whether the Project route would sterilise the mineral resource capacity within defined Mineral Safeguarding Areas (MSAs) and, if so, whether removal prior to development is warranted. There are no proposals to extract mineral resources from MSAs within Essex as two potential locations for gravel extraction close to the M25 (Boyn Hill and Lynch Hill) are considered unviable as their extraction could cause structural damage to the M25. In other areas close to the Project route where gravel has been discovered the material is located beneath the London Clay Formation and is considered uneconomically viable to extract. The assessment also refers to the temporary relocation of overhead powerlines over an identified Black Park Gravel Member mineral resource. As this is a temporary activity, permanent sterilisation would not occur.

Policy	Policy guidance	Policy assessment
	• any land-use policy, proposal or allocation relating to land within an MSA being considered by the Local Planning Authority for possible development as part of preparing a Local Plan (with regard to the above thresholds). Non-mineral proposals that exceed these thresholds shall be supported by a minerals resource assessment to establish the existence or otherwise of a mineral resource of economic assessment to establish the existence or otherwise of a mineral resource of economic importance. If, in the opinion of the Local Planning Authority, surface development should be permitted, consideration shall be given to the prior extraction of existing minerals. Mineral Consultation Areas MCAs are designated within and up to an area of 250 metres from each safeguarded permitted minerals development and Preferred and Reserve Site allocation as shown on the Policies Map. The Mineral Planning Authority shall be consulted on: • Any planning application for development on a site located within an MCA except for the excluded development identified in Appendix 5, • Any land-use policy, proposal or allocation relating to land within an MCA that is being considered as part of preparing a Local Plan Proposals which would unnecessarily sterilise mineral resources or conflict with the effective workings of permitted minerals development, Preferred or Reserve Mineral Site allocation shall be opposed.	

Table C.15 Essex and Southend-on-Sea Waste Local Plan (July 2017)

Policy	Policy guidance	Policy assessment
Policy 2 – Safeguarding Waste Management Sites and Infrastructure	Waste Consultation Areas Where non-waste development is proposed within 250 m of safeguarded sites, or within 400 m of a Water Recycling Centre, the relevant Local Planning Authority is required to consult the Waste Planning Authority on the proposed non-waste development (except for those developments defined as 'Excluded' in 'Appendix C - Development Excluded from Safeguarding Provisions'). Proposals which are considered to have the potential to adversely impact on the operation of a safeguarded waste site or infrastructure, including the site allocations within this Plan, are unlikely to be opposed where: 51. a temporary permission for a waste use has expired, or the waste management use has otherwise ceased and the site or infrastructure is considered unsuitable fora subsequent waste use 52. redevelopment of the waste site or loss of the waste infrastructure would form part of a strategy or scheme that has wider environmental, social and/or economic benefits that outweigh the retention of the site or the infrastructure for the waste use, and alternative provision is made for the displaced waste use 53. a suitable replacement site or infrastructure has otherwise been identified and permitted.	The Waste Strategy forms part of the Environmental Statement (ES) (Application Document 6.1). Chapter 11: Materials and Waste demonstrates how construction and operational waste from the Project would be managed, including waste reduction. The waste arrangements proposed for the construction and operational phases of the Project are detailed in Appendix 11.5: Waste Assessment Supporting Data (Application Document 6.3) of the ES. The arrangements include proposed mitigation measures to reduce the volume of waste produced and sent for disposal. Details are also provided of onsite and offsite waste management arrangements, targets and contractor performance. The volumes of hazardous and non-hazardous waste arising from the construction and operational phases of the Project are forecast in Table 1.1 and Table 1.2 of Appendix 11.5 and compared with the local, regional and national waste infrastructure capacity in Section 11.6 of Chapter 11. The assessment shows that waste from the Project can be dealt with appropriately by the waste infrastructure, which is (or is likely to be) available. The assessment demonstrates that any adverse effect on the capacity of existing waste management facilities, as a whole, to deal with other waste arisings in the area would not occur. Contractors are to achieve a minimum recovery of 70% (by weight) of non-hazardous construction waste [REAC Ref No. MW013].

Policy	Policy guidance	Policy assessment
		Contractors would be required to produce a Site Waste Management Plan setting out procedures for the characterisation, management and monitoring of waste arisings and to ensure the waste hierarchy is implemented with opportunities to reduce waste generation or improve recovery/recycled rates. [REAC Ref No. MW009] Contractors would be required to achieve a target of 70% (by weight) of hazardous construction waste to be diverted from landfill. Where hazardous construction waste cannot be diverted from landfill, the justification and evidence for this would be provided by the Contractors. [REAC Ref No. MW015] Section 11.5 of Chapter 11 also outlines the steps taken towards waste minimisation through design as well as targets to divert waste from disposal, except where an alternative is the most sustainable outcome overall. Table 1.1 of Appendix 11.5 outlines how construction waste would be recovered in line with the requirement of the Waste Management Plan for England (WMPE) (Department for Environment, Food and Rural Affairs, 2013) and the forecast percentage of waste estimated to be diverted from landfill. Over 70% (by weight) of Construction and Demolition Waste (CDW) generated by the Project would be subject to material recovery in accordance with the Waste Framework Directive (WaFD). Section 11.5 of Chapter 11 outlines how circular economy principles have been applied throughout the Project to manage resource use and reduce waste. The Project has demonstrated the implementation of the waste hierarchy as follows:

Policy	Policy guidance	Policy assessment
		• Elimination: Section 11.5 of Chapter 11 outlines how the volume of waste generated has been reduced in design. • Reuse/Recycling: Table 1.1 of Appendix 11.5 shows how the Project would divert more than 70% of waste from landfill and Section 11.6 of Chapter 11 demonstrates an acceptable impact to the local recycling/recovery facility capacity. • Disposal: Section 11.6 shows the waste generated during the construction phase (which is assumed to be sent for disposal in landfill), is likely represent less than 1% of the landfill capacity in England for all waste types (non-hazardous, inert and hazardous waste). The waste generated during the construction phase (which is assumed to be sent for disposal in landfill), is likely represent 2.59% of the landfill capacity in the study area for non-hazardous and inert waste (968,857m^3). • There is one hazardous landfill which accepts asbestos waste along with other hazardous wastes within the study area. Should the hazardous waste generated by the Project require landfill disposal it would likely be managed outside the study area. The Project would require less than 0.33% of the available national hazardous waste capacity. It is therefore considered unlikely to adversely affect the capacity of existing waste management facilities to deal with other waste arisings.

Table C.16 Essex Transport Strategy: The Local Transport Plan for Essex (June 2011)

Policy	Policy guidance	Policy assessment
Policy 4: Public Transport	The County Council will develop the public transport network to assist economic growth and improve access to essential services by: 51. focusing development and improvement on a network of core bus routes linking locations that attract significant numbers of people 52. working with commercial bus service operators to improve service reliability, punctuality and accessibility; 53. continuing to work in partnership with train operating companies and Network Rail to improve rail services 54. working with bus and train operators to improve integration between bus and rail services 55. working towards the introduction of multi-operator ticketing; 56. managing the English National Concessionary Travel Scheme for Essex 57. ensuring that accurate and up-to-date service information is made available through a range of media 58. working with the police and public transport operators to reduce crime and fear of crime when 59. travelling on the transport network lobbying Government for increased local involvement in the planning and provision of local rail and more effective partnership working with operators over the provision of bus services.	This Project is a new road project designed to alleviate the substantial congestion, deliver positive effects for public transport and knock-on social, economic and environmental effects that occur as a result of that congestion on the existing highway network. A Transport Assessment (TA) has been prepared. The TA (Application Document 7.9) sets out an assessment of the forecast transport impacts on the strategic and local road network as a result of the Project. It also considers the public transport network in the area and public rights of way (PRoW). Accordingly, it considers the forecast impacts on public transport users; walkers, cyclists and horse riders (WCH) as well as drivers and passengers in motorised vehicles. The TA also identifies that a number of railway lines would either cross the Project or lie in close proximity to it and that a number of existing bus and coach services operate in the vicinity of the Project. The operational assessment, however, identifies that there would be no adverse impacts on the users of the bus or rail networks when the Project is in operation. Public transport operators have been engaged in the extensive consultation exercise that has accompanied the evolution of the design of the Project as set out in the Consultation Report (Application Document 5.1).

Policy	Policy guidance	Policy assessment
Policy 5: Connectivity	Transport networks will be strengthened to support a vibrant, successful and sustainable future for Essex by: • improving travel links within and between our main towns • focusing investment on routes where improvements will give the greatest benefit to the economy of Essex • improving journey times and journey-time reliability by targeting congestion improvement measures • providing for the use of more sustainable forms of travel • ensuring international gateways have effective surface access strategies that promote appropriate and sustainable transport • developing appropriate provision of park and ride facilities serving our main towns • working with partner agencies to identify and deliver essential improvements to nationally important road and rail connections.	The Project would provide over 80% additional road capacity across the River Thames, linking with the A2 and the M2 in the south and the M25 in the north and providing increased cross river resilience and improved safety. This would also benefit leisure and business travellers by providing quicker, more reliable journey times locally, regionally and nationally. The Transport Assessment (Application Document 7.9) sets out the benefits of the Project in terms of improving the operation of the strategic road network (SRN) directly connected to the Project and providing additional highway capacity. Specifically, the Project is forecast to reduce traffic on the Dartford Crossing by an average of 19% in the 2030 opening year and improve journey times on the Dartford Crossing, reducing congestion on this part of the strategic road network. The Project would support sustainable local development and regional economic growth in the medium to long term by providing improved journey times for freight travelling to and from Dover.
Policy 6: Freight Movement	The Council will manage the efficient movement of freight within the county by: • working with operators to ensure that heavy goods vehicles use identified routes and that other freight traffic uses the most appropriate routes • working with local businesses to promote and support the sustainable distribution of goods • working in partnership with the Highways Agency and neighbouring authorities to provide live travel information to freight operators	The Transport Assessment (Application Document 7.9) shows that there is forecast to be a decrease in the level of HGVs using the Dartford Crossing, as a result of the Project thereby improving the overall performance of the strategic road network (SRN), though notes that in combination flows for both crossings in the opening year of 2030 is forecast to result in a significant increase in total HGV flows. The Transport Assessment states that as part of the Project's safety and security the new road would include technology to manage traffic and provide better information to drivers, including variable

Policy	Policy guidance	Policy assessment
	• encouraging a shift of freight from road transport to rail transport.	message signs to display variable speed limits, travel information, hazard warnings and both advisory and mandatory signage to drivers.
Policy 7: Carbon Reduction	Essex County Council will support and encourage the use of lower carbon travel by: • promoting the use of more sustainable forms of travel (Policy 8) • ensuring new developments minimise the number and length of trips made by private vehicles (Policy 2) • supporting use of emerging low-carbon technologies to reduce carbon emissions from transport sources • ensuring the Essex road network operates efficiently to minimise CO2 emissions from vehicles • adopting measures to improve energy efficiency and further reduce carbon emissions arising from our own activities.	Chapter 15 (Climate) of the ES (Application Document 6.1) assesses the potential 'worst-case scenario' impacts of the Project on greenhouse gas (GHG) emissions and the vulnerability of the Project to climate change during construction and operation. It is supported by a Carbon & Energy Plan (Application Document 7.19). This Plan quantifies the carbon emissions likely to be generated by the project and measures for reducing them and sets out how the Project would contribute to the UK's net zero carbon goal. It shows how the Applicant has acted to reduce emissions by including mitigation measures embedded in the preliminary design and by embedding carbon reductions in the construction stage through the procurement process to ensure that the Contractors are contractually bound to comply with relevant commitments made as part of this application. These measures and an explanation of how they would be secured through the REAC (Section 7 of the CoCP, Application Document 6.3) are set out in section 3 of the Carbon & Energy Management Plan (Application Document 7.19). Overall, Chapter 15 Climate of the ES (Application Document 6.1) concludes that the GHG impact of the Project would not have a material impact on carbon reduction targets as set by the UK Government and is therefore not significant.
Policy 8: Promoting Sustainable Travel Choices	The County Council will encourage the use of more sustainable forms of travel by:	The Project has sought to identify and address the needs of cyclists and pedestrians and incorporates provision of new routes for walkers, cyclists and

Policy	Policy guidance	Policy assessment
	• consistently supporting and promoting sustainable travel • providing infrastructure for sustainable transport • working with partners and service providers to promote the use of sustainable forms of travel and to identify new ways to provide services • requiring effective travel planning for proposed developments in line with the Council's current development management policies • developing effective travel plans with existing work places, schools, and other locations that attract a significant number of people • promoting access by sustainable forms of transport to the county's railway stations, ports and airports.	horse-riders (WCH), designed to improve access to the existing network, maximise access for users (including those with limited mobility) whilst considering and mitigating potential impacts from misuse and anti-social behaviour through good design. New and improved routes for WCH are shown on ES Figure 13.54 (Application Document 6.2) dealing with Population and Human Health. The Framework Construction Travel Plan (Application Document 7.13) sets out a framework to minimise the impact of the Project's construction workforce on the road network as a result of travel to and from the Project construction worksites, compounds and ULH. This would be achieved by: • Reducing single occupancy vehicle trips and encouraging sustainable and active travel • Exploring opportunities to change travel behaviours by identifying the most efficient ways of working which reduce the need to travel and the distance travelled • Requiring contractors to develop, before starting construction, Site Specific Travel Plans for individual compounds in accordance with this Framework Construction Travel Plan and following latest policy advice and best practice applicable at the time. The overarching aims of the Framework are also set out in the CoCP (ES Appendix 2.2, Application Document 6.3) and are secured through Requirements 10 and 11 of Part 1 to Schedule 2 of the dDCO (Application Document 3.1). The Outline Traffic Management Plan for Construction (Application Document 7.14) (oTMPfC)

Policy	Policy guidance	Policy assessment
		has been produced to provide outline concepts and principles that would be applied for the design and management of construction traffic management and transport logistics for the Project. The outline document, which has been the subject of engagement with highway authorities, provides an initial framework for how the traffic management in connection with the Project would be controlled.
Policy 9: The Natural, Historic and Built Environment	The County Council will protect the natural, historic and built environment from the harmful effects of transport by: • designing and implementing transport improvements and maintenance works that retain the integrity of the built environment, natural habitats and biodiversity, the natural and historic landscape, and water quality • minimising the visual and noise impacts of transport • addressing air quality issues through appropriate measures, particularly in designated Air Quality Management Areas;	Chapter 7: Landscape and Visual of the Environmental Statement (ES) (Application Document 6.1) has evaluated the impact of the Project on the visual amenity of the wider area, which has been assessed in accordance with the NPSNN. It is acknowledged that a development of this scale would have unavoidable impacts though notes the mitigation proposed will help reduce the Project's visibility and impact within the wider area. The Project Design Report (Application Document 7.4) provides details of the Project's design and its integration within the landscape, demonstrating how the Project would be designed to a high standard with measures taken to ensure any impacts on the surrounding area are minimised as far as possible. Chapter 8: Terrestrial Biodiversity of the ES (Application Document 6.1) includes mitigation measures to manage the impact construction dust would have on designated and non-designated sites. Measures such as covering spoil during transportation, wheel washing and washing down hard surfaces would minimise dust emissions. Chapter 8 should be read alongside Chapter 5: Air Quality which has concluded that there would be no significant impacts to air quality including dust and pollutants, to designated and non-designated sites.

Policy	Policy guidance	Policy assessment
		Chapter 5: Air Quality and Chapter 12: Noise and Vibration assess the impact of the Project on air quality, noise and vibration, concluding that there would be no significant impacts to air quality or as a result of noise and vibration. Chapter 6: Cultural Heritage examines the potential effects of the Project on cultural heritage during both the construction and operational phases. The assessment of effects on cultural heritage has considered construction and operational effects on archaeological remains, built heritage and historic landscapes. The Project would permanently impact on the following designated heritage assets within the County: • Scheduled Orsett Crop Mark Complex (SM1) • Grade II Listed Buildings at No. 1 and No. 2 Greys Corner Cottages (LB89), Thatched Cottage (LB58) and Murrells Cottages (LB96) The Project would permanently impact on the following high-value non-designated archaeological assets north of the River Thames which would experience significant permanent effects: • Cropmarks identified at Grey Goose Farm (247) • Long barrow or mortuary enclosure (325) • Early Prehistoric to Late Prehistoric activity associated with wetland occupation on the Mark Dyke Valley (4626) • Neolithic to Medieval multi-period site of settlement, industrial, funerary and agricultural activity south of Gravelpit Farm (496)

Policy	Policy guidance	Policy assessment
		• Bronze Age and Iron Age cropmark complex (2078) For each of the designated heritage assets, physical impacts cannot be avoided. Mitigation in the form of building recording of the Listed Buildings, archaeological excavation and recording of the Scheduled and non-designated archaeological assets is proposed. The Need for Project (Application Document 7.1) has set out the overriding need and benefits of the Project.
Policy 10: Road Safety	The County Council will work to reduce the incidence and severity of road traffic collisions on roads in Essex by: • continuing to work within the strong partnership framework provided by the Essex Casualty & Congestion Reduction Board • prioritising measures which reduce the number of people killed or seriously injured • ensuring Safety Audits are undertaken of all proposed designs of new highway schemes or proposals to materially alter the existing public highway	The Transport Assessment (Application Document 7.9) shows that some links are forecast to experience an increase in the accident rate in the 2030 opening year for example a slight increase in accidents on the A13 in part due to the increased vehicles using the A122 and A13. The assessment has also forecast changes in accident rates as a result of the Project in line with relevant guidance (Transport Analysis Guidance (TAG), Costs and Benefits Appraisal - Light Touch (COBALT)), which shows a forecast increase in traffic accidents on the Affected Road Network (ARN) when the Project is operational. However, this is a reflection of the significant forecast increase in the total traffic flows across the River Thames. Overall, the number of traffic accidents per vehicle kilometre travelled would decrease (Table 9.5 in section 9 of Part 2 of the TA (Application Document 7.9) A Road Safety Audit arrangement has been put in place to demonstrate a rigorous process for monitoring and evaluating safety.

Policy	Policy guidance	Policy assessment
		The preliminary design of the Project has been subject to a Stage 1 Road Safety Audit. Stage 2 and 3 Road Safety Audits will be carried out following detailed design and construction of the Project. A Stage 4 Road Safety Audit will be carried out 12-months post Project operation using validated collision data.
Policy 14: Cycling	The County Council will encourage cycling by: • promoting the benefits of cycling • continuing to improve the cycling facilities within the main urban areas of Basildon, Chelmsford, Colchester and Harlow • developing existing cycling networks in other towns where cycling offers an appropriate local solution • working with schools and employers to improve facilities for cyclists • improving access to local services by integrating the Public Rights of Way, walking and cycling networks to form continuous routes • providing training opportunities to school children and adults.	The Project would be accessible to all, particularly through improved connectivity and accessibility for all walkers, cyclists and horse riders (WCH) via the creation of new and improved Public Rights of Way (PRoW). A significant level of new provision (footpaths, bridleways and cycleways) would be provided by the Project, with approximately 1.4km of cycle track, 26km of shared track (pedestrians and cyclists), 3km of bridleways and 1.2km of unmade footpaths within the boundary of Havering, as part of an overall provision of 46km of new and improved walking, cycling and horse riding routes..
Policy 15: Walking and Public Rights of Way	The County Council will promote walking and use of the Public Rights of Way network by, • promoting the benefits of walking • facilitating a safe and pleasant walking environment that is accessible to all • improving the signage of walking routes • ensuring that the public rights of way network is well maintained and easy to use by walkers, cyclists and equestrians.	The Project would be accessible to all, particularly through improved connectivity and accessibility for all walkers, cyclists and horse riders (WCH) via the creation of new and improved Public Rights of Way (PRoW). A significant level of new or improved footpath and bridleway provision would be created by the Project, with approximately 46km of new or improved Walking, Cycling and Horse Riding routes.

Table C.17 Havering Local Plan 2016-2031 (November 2021)

Policy	Policy Guidance	Policy Response
Policy 12: Healthy Communities Shortened Policy	The Council will support development in Havering that provides opportunities for healthy lifestyles, contribute to the creation of healthier communities and helps reduce health inequalities. The Council will seek to maximise the potential health gains from development proposals and ensure that any negative impacts are mitigated. All major development proposals must be supported by a Health Impact Assessment (HIA) to demonstrate that full consideration has been given to health and wellbeing and the principles of active design. The Local Plan will promote health and wellbeing by: • Providing and protecting open space, leisure and recreation facilities (refer to Policy 18) • Supporting measures to promote walking and cycling (refer to Policy 23) • Supporting the provision of multifunctional green infrastructure (refer to Policy 29) • Seeking environmental improvements, minimising exposure to pollutants and improving air quality (refer to Policies 33 and 34) • Avoiding contributing to factors that affect climate change, and contribute to prevention measures that mitigate against the effects of climate change (refer to Policies 32 and 36).	Chapter 13: Population and Human Health in the Environmental Statement (ES) (Application Document 6.1) identifies existing and proposed land uses in the vicinity of the Project route and assesses the potential effects of the Project on people and communities.
Policy 18: Open space, sports and recreation Shortened Policy	The Council seeks to ensure that all residents of Havering have access to high quality open space, sports and recreation facilities. To achieve this, the Council will:	Chapter 13: Population and Human Health in the Environmental Statement (ES) (Application Document 6.1) identifies existing and proposed land uses in the vicinity of the Project route and assesses

Policy	Policy Guidance	Policy Response
	• Continue to protect the borough's designated open spaces and existing sports and recreation facilities from development unless it can be demonstrated that: • Replacement provision of equivalent or better quantity and quality will be made in a suitable location • The development is for alternative sports and recreational provision and the need for this clearly outweighs the loss. • Support proposals that improve the quality of and access to, existing open space, sports and recreation facilities	the potential effects of the Project on people and communities. The assessment has also considered the potential effects of the Project on existing open space, sports and recreational facilities in line with the tests described in the NPSNN. Where relevant, replacement land is to be provided, as described in Chapter 13 Population and Human Health of the ES. The functionality and connectivity of Green Infrastructure is set out within the Project Design Report (Application Document 7.4), and Design Principles (Application Document 7.5). There are proposals to connect the Ockendon Link and improve existing walking, cycling and horse-riding (WCH) routes. The proposals are designed to complement the Thames Chase Plan strategy for landscape regeneration through enhanced connected woodland and green space, including improved access through enhancements to the 'Forest circle' and creation of interconnected 'Greenway routes' through and around the Thames Chase area. Landscape mitigation within the Ockendon Link would take the form of wetland creation. Over and above the visual and biodiversity benefits of this new form of habitat, the proposals would also make the WCH recreational experience more enjoyable and potentially reduce the need for flood compensation on adjacent land. Restoration of the historical fen landscape has been a long-term aspiration for the group Land of the Fanns as part of their 'Rediscovering the Lost Fens' project. The creation of wetlands and fen habitats as part of the embedded mitigation in Orsett Fen adjacent to the

Policy	Policy Guidance	Policy Response
		Project route would not preclude the future aspirations of the Land of the Fanns. Figure 2.4: Environmental Management Plan (Application Document 6.2) of the ES identifies the embedded environmental mitigation measures for the Project, including WCH routes, areas of open space, replacement land and embedded environmental mitigation. (Please see the response to Policy DC18 below). Opportunities proposed as part of the Project include addressing the historic severance of the M25 and providing better recreational access to the fenland landscape from Thames Chase. Opportunities also exist to mitigate the severance of informal off-road routes between North and South Ockendon.
Policy 22: Skills & Training	The Council will promote employment and skills development opportunities for local residents by supporting major development proposals that commit to: • A minimum local labour target of 20% during construction and end user phase for major commercial or mixed use developments including a proportion of apprenticeships where the length of construction phase allows • A minimum local labour target of 20% during construction for major residential developments • The notification of all vacancies associated with the development and its end use through the Council's employment service • Offer opportunities to local businesses within their supply chains.	The Project is a £multi-billion construction undertaking which would create substantial local employment opportunity. The Benefits and Outcomes Document (Application Document 7.20) identifies target outcomes which aim delivering local skills, increasing local employment, creating increased awareness in construction, and expanding the local supply chain. Application Document 7.20 Benefits and Outcomes sets the following skills & employment strategy targets: • Apprenticeships – 473 people • Newly employed – 500 people • Graduates / Trainees – 291 people • Pre-employment programmes – 650 people • Training for Local Residents – 350 people • Work Placement – 470 people

Policy	Policy Guidance	Policy Response
	Where local labour targets cannot be achieved and it can be demonstrated that all opportunities to meet this target have been explored a commuted sum payable to the Council will be required. Major development proposals will be expected to submit an Employment & Skills Plan for agreement with the Council to detail how these targets will be met. This must include the proportion of apprenticeships offered and the opportunities given to local businesses within their supply chains. The Employment & Skills Plan needs to comply with the Mayor of London's Economic Development Strategy.	• Support for Education Leads – 2,000 Hours of support • Education Engagement – 5,000 hours • Sector Skills Qualifications – 500 people These measures would be secured through a Section 106 agreement with the relevant local authorities (Application Document 7.3).
Policy 23: Transport Connections Shortened Policy	The Council will support and encourage developments in Havering in the locations that are most accessible by a range of transport options. The Council supports development which ensures safe and efficient use of the highway and demonstrates that adverse impacts on the transport network are avoided or, where necessary, mitigated. Major planning applications will require a transport assessment in line with TfL's Transport Assessment Best Practice Guidance. When bringing forward a planning application full Travel Plans or Travel Plan Statements will be required for development reaching certain thresholds as set out in Transport for London's (TfL) latest Guidance on Travel Plan requirements. The Council will work with its partners, including developers, the Mayor of London and central government to improve transport infrastructure and the connectivity of the borough by: vi. Enhancing strategic transport links across the borough	The Transport Assessment (Application Document 7.9) sets out the benefits of the Project in terms of improving the operation of the strategic road network (SRN) directly connected to the Project route and providing additional highway capacity. The Project is forecast to reduce traffic on the Dartford Crossing and improve journey times, reducing congestion on this section of the SRN.

Policy	Policy Guidance	Policy Response
	viii. Providing residents with options to travel sustainably and enabling walking and cycling xiv. Supporting new developments that include shared use routes for people walking and cycling which lead to public open spaces and parks to promote active recreational activities The Council will work positively with those who share its ambition to deliver these key transport infrastructure improvements and will support development proposals that are able to contribute to their delivery.	
Policy 26: Urban Design	The Council will promote high quality design that contributes to the creation of successful places in Havering by supporting development proposals that: • Are informed by, respect and complement the distinctive qualities, identity, character and geographical features of the site and local area • Are of a high architectural quality and design • Provide creative, site specific design solutions • Respect, reinforce and complement the local streetscene • Provide active streets, good sight lines and natural surveillance • Are designed in accordance with the principles of Secured by Design • Respond to distinctive local building forms and patterns of development and respect the visual integrity and established scale, massing, rhythm of the building, frontages, group of buildings or the building line and height of the surrounding physical context	The Project design is in line with DMRB and National Highways' The Road to Good Design (2018), requiring road networks to, 'reflect in its design the beauty of the natural, built and historic environment through which it passes, and enhancing it where possible'. The Design Principles document (Application Document 7.5) responds to this requirement. Figure 2.4: Environmental Masterplan (Application Document 6.2) of the ES identifies the embedded environmental mitigation measures for the Project.

Policy	Policy Guidance	Policy Response
	• Fully integrate with neighbouring developments, existing path and circulation networks and patterns of activity particularly to accommodate active travel • Provide well-defined public realm with defensible private spaces • Are built of high quality, durable, robust, low maintenance materials that integrate well with surrounding buildings • Provide a high standard of inclusive access for all members of the public • Demonstrate adequate on-going maintenance and management arrangements • Make use of design competitions or other creative processes that can improve the design quality. The council will require development proposals of a strategic nature to be subject to Design Review.	
Policy 27: Landscaping	The Council will support development proposals that incorporate a detailed and high quality landscape scheme which: • Takes full account of the landscape character of the site and its wider setting • Retains and enhances existing landscape features that contribute positively to the setting and character of the local area • Demonstrates how existing landscape features will be protected during the construction phase • Maximises opportunities for greening, through the planting of trees and other soft landscaping • Provides strong boundary treatment that integrates with and is sympathetic to the local landscape character and street scene	A landscape and visual impact assessment has been undertaken in accordance with the methodology set out in Design Manual for Roads and Bridges (DMRB) LA 107 Landscape and Visual Effects (Highways England, 2020a), and relevant guidance including Landscape Institute and Natural England publications. Details are provided in Chapter 7: Landscape and Visual of the ES. The Project Design Report (Application Document 7.4) provides details of the design and structure of the Project route and how this would integrate within the landscape. The Project would be designed to a high standard with measures taken to minimise any impacts as far as possible.

Policy	Policy Guidance	Policy Response
	• Supports natural habitats and opportunities for enhancing biodiversity. All proposals will be required to demonstrate that adequate arrangements have been made for future maintenance and management and major development proposals should be supported by a comprehensive Management Plan.	
Policy 28: Heritage Assets	The Council recognises the significance and value of Havering's heritage assets and will support: • Proposals that seek to conserve and enhance the significance of heritage assets at risk in the borough • The maintenance of up to date Conservation Area Appraisals and Management Plans • The identification, and maintenance, of a local list of non-designated heritage assets that meet agreed selection criteria • Well designed and high quality development in a Conservation Area, or its setting, which preserves, enhances or better reveals the character and appearance of the area and its significance, and which contributes to local character and distinctiveness, taking into account the Conservation Area Appraisal or Management Plan. Where a building (or other element) detracts from the significance of a Conservation Area, its removal will be supported when acceptable plans for redevelopment have been agreed • Viable uses, alterations or extensions to a listed building, or development within its setting, which would not be harmful to the significance of the	Chapter 6: Cultural Heritage of the Environmental Statement (ES) (Application Document 6.1) examines the potential effects of the Project on cultural heritage during both the construction and operational phases. The assessment of effects on cultural heritage has considered construction and operational effects on archaeological remains, built heritage and historic landscapes. Information regarding the historic environment in Section 6.4 of Chapter 6 has been obtained from relevant sources including Historic Environment Records. Chapter 4 of this Planning Statement sets out the Project's case for compliance, demonstrating the compelling need for the Project and delivery of its substantial public benefits, representing circumstances which are wholly exceptional and justify the loss or substantial harm to historic assets. The Need for the Project (Application Document 7.1) explains the benefits of the Project as follows: • The considerable journey time saving benefits • Enhanced connectivity • Improved productivity of businesses in the Lower Thames and wider region due to faster

Policy	Policy Guidance	Policy Response
	heritage asset, including its historic and architectural interest • Well designed and high quality development within a Registered Park or Garden of Historic Interest, Historic Park or Garden of Local Interest, Area of Special Townscape or Landscape Character, or within their setting, which sustains or enhances the significance of the heritage asset, including its special character and important views • Well designed and high quality proposals which would not affect the significance of a heritage asset with archaeological interest, including the contribution made to significance by its setting • The maintenance of up to date Archaeological Priority Areas Where a development proposal is judged to cause harm then it will be assessed against the relevant test in the National Planning Policy Framework (NPPF) depending on whether the harm caused is substantial or less than substantial.	and more reliable journeys and improved accessibility • Significantly reduced congestion at the Dartford Crossing • Provision of substantial additional capacity and new route options across the Thames east of London
Policy 29: Green Infrastructure	The Council will seek to maintain and expand the network of green spaces and natural features in Havering and optimise the benefits of green infrastructure to the environment, economy and community. The Council will support development which includes green infrastructure on-site which is multifunctional and integrates into the wider green infrastructure network. Developers are expected to work with existing partnerships to support and enhance green infrastructure provision including: • The All London Green Grid	Green Infrastructure is assessed in Chapter 6 of this Planning Statement and also within Appendix H: Green Infrastructure Study. The assessment in Appendix E of the Planning Statement: Green Belt concludes that the project benefits from Very Special Circumstances which outweigh the harm to the green belt from the inappropriateness of the proposal. When taken together in terms of impacts on Green Belt, open space, GI, soil quality, contamination, minerals safeguarding and Best and Most Versatile Agricultural Land as assessed in ES Chapters 10: Geology and Soils and Chapter 11 Materials (Application Document 6.1) , while there

Policy	Policy Guidance	Policy Response
	• Thames Chase Community Forest • Rainham Wildspace • Land of the Fanns Landscape Partnership • Roding, Beam & Ingrebourne Catchment Partnership	are acknowledged impacts overall, the net benefit delivered by the Project are considered to outweigh any adverse impacts (see Application Documents 7.1: The Need for the Project and Application Document 7.20: Benefits and Outcomes Document.
Policy 30: Biodiversity and geodiversity	The Council will protect and enhance the borough's natural environment and seek to increase the quantity and quality of biodiversity in Havering by: • Ensuring developers demonstrate that the impact of proposals on protected sites and species have been fully assessed when development has the potential to impact on such sites or species. Appropriate mitigation and compensation measures will also need to be identified where necessary. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission will normally be refused • Not permitting development which would adversely affect the integrity of Specific Scientific Interest, Local Nature Reserves and Sites of Importance for Nature Conservation except for reasons of overriding public interest, or where adequate compensatory measures are provided; If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission will normally be refused	Section 8.6 in Chapter 8: Terrestrial Biodiversity of the ES (Application Document 6.1) assesses the potential effects of the Project on ecological receptors which would be affected in terms of habitat loss and degradation. Mitigation measures include replacement of land and landscape features, proposed green bridge structures along the Project route and extensive woodland planting at the junctions, as well as further additional linear planting and wider hedgerow reinstatement adjacent to the Project route to aid visual screening and landscape integration. In addition, typically 4m high false cutting earthworks would provide permanent visual screening.

Policy	Policy Guidance	Policy Response
	• Supporting proposals where the primary objective is to conserve or enhance biodiversity • Encouraging developments where there are opportunities to incorporate biodiversity in and around the development • Supporting developments that promote the qualitative enhancement of sites of biodiversity value, (by supporting proposals that improve access, connectivity and the creation of new habitats. Measures include maintaining trees, native vegetation, and improving and restoring open spaces and green infrastructure for the benefit of wildlife • Working with partners and local conservation groups to improve conditions for biodiversity in the borough.	
Policy 31: Rivers and river corridors Shortened Policy	Havering's rivers and river corridors fulfil important biodiversity, recreation, placemaking, amenity, freight transport and flood management functions which the Council will seek to optimise. The Council will seek to enhance the river environment by requiring major developments in close proximity to a river to investigate and, where feasible, secure opportunities to restore and enhance rivers and their corridors in line with the Thames River Basin Management Plan (RBMP). This should, wherever possible, include the integration of flood defences into new developments. Where enhancements or restoration are financially viable but not feasible a financial contribution will be sought. To protect and enhance the biodiversity and amenity value of river corridors while accommodating future adaptations to flood defences, the Council will require	The existing water environment (water quality, water resources and physical characteristics) is described in Chapter 14: Road Drainage and the Water Environment of the ES (Application Document 6.1), as well as the effects of the Project which are described and assessed. The surface water bodies located within the Project's Zone of Influence are presented in Drawing 2, Annex C of Appendix 14.7 of the ES (Application Document 6.3). A Water Features Survey has been undertaken which is a factual record (desktop assessment and photographic record) of the baseline characteristics of surface and groundwater features present that may be affected by the construction of the Project, including the energy NSIP elements of the Project

Policy	Policy Guidance	Policy Response
	development to be set back by 8 metres from main rivers, ordinary watercourses and other flood assets, and 16 metres from tidal rivers or defence structures, including tie rods and anchors.	(Appendix 14.2 of the ES, Application Document 6.3). The overall conclusion of Chapter 14 Road Drainage and Water Environment of the ES (Application Document 6.1), taking into account the project design and mitigation set out in Section 14.5 is that there would be no likely significant adverse effects on water environment receptors Table 14.8). In terms of flood risk the majority of the Order Limits falls within Flood Zone 1 which is the lowest level of flood risk. Only small parts of the project cross Flood Zones 2 and 3. These higher risk areas are addressed in Chapter 14: Road Drainage and Water Environment of the ES (Application Document 6.1) and in Appendix 14.6, Flood Risk Assessment (Application Document 6.3), in particular.
Policy 32: Flood Management	The Council will support development that seeks to avoid flood risk to people and property and manages residual risk by applying the Sequential Test and, if necessary, the Exception Test as set out in the NPPF. The Council's Strategic Flood Risk Assessment should be used as a starting point regarding local flood risk guidance. In addition to the requirements set out in the NPPF, the Council will require site-specific flood risk assessments for development on: • Sites where drainage problems have been identified by the Council • The Washlands Flood Storage Area (FSA) • Sites deemed necessary by the Council as a Lead Local Flood Authority.	Chapter 14: Road Drainage and the Water Environment of the ES (Application Document 6.1) has assessed the impacts of the Project on road drainage and the water environment during the construction and operational phases. A Flood Risk Assessment (FRA) has been prepared for the Project and is presented in Appendix 14.6 of the ES (Application Document 6.3) which identifies potential sources of flood risk in relation to the Project. The FRA has also provided further details in relation to the Sequential and Exception tests. Flood resilience is provided by making allowances for climate change in the highway drainage design.

Policy	Policy Guidance	Policy Response
	The Council will seek to reduce the risk from surface water flooding by requiring development proposals to: • Reduce surface water runoff by providing sustainable drainage systems (SuDS), unless there are practical reasons for not doing so • Ensure that proposals for SuDS apply the London Plan drainage hierarchy achieving greenfield run-off rates, where feasible, and include clear arrangements for ongoing maintenance over the lifetime of the development. The Council will expected developments to identify reasonable opportunities for flood risk reduction measures and resilient design and construction and not increase the risk of flooding. The Council will seek financial contributions towards the anticipated costs of flood risk management infrastructure required to protect the proposed development over its lifetime.	
Policy 33: Air Quality	The Council is committed to improve air quality in Havering to improve the health and wellbeing of Havering's residents. The Council will support development which: • Is at least air quality neutral • Optimises the use of green infrastructure to reduce pollution concentrations and exposure (see Policy 29) • Delivers measures to support active travel to reduce emissions (see Policy 23) • Meets the targets for carbon dioxide reduction in the London Plan (see Policy 36) • Minimises emissions from construction (see Policy 34).	The impact the Project would have upon air quality is addressed within Chapter 5: Air Quality of the ES (Application Document 6.1). The assessment reports on the change in concentrations of nitrogen dioxide (NO2) and particulate matter (PM2.5 and PM10) at human exposure locations, and nitrogen deposition in relation to effects on ecology designated sites. Properties located within 200m of construction activities have the potential to be adversely affected by construction dust. However, these effects would be temporary in nature and suitably controlled using best practice measures and so are not considered to be significant.

Policy	Policy Guidance	Policy Response
		Construction phase traffic and associated traffic management is not considered to result in significant air quality effects at human health receptors and measures are in place through the REAC to minimise construction air quality impacts Mitigation measures are in place during construction (see REAC commitments AQ001 to 008) (Application Document 6.3) which are secured through Requirement 4 of Part 1 to Schedule 2 of the dDCO (Application Document 3.1). During the operational phase a reduction in NO2 and PM10 is predicted at receptors in the period up to the project opening due to improvements in vehicle emissions over this period. The air quality modelling results show that the operation of the Project would result in both improvements and deteriorations in local air quality as a result of Project-associated changes in traffic flows. Overall, the construction and operation of the proposed development will not give rise to unacceptably harmful impacts human health and the additional impacts upon ecological receptors will be offset by the proposed compensatory habitats which have been included within the order limits. The air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme have been assessed and the Project will not affect the UKs ability to comply with the Air Quality Directive.
Policy 34: Managing Pollution	The Council will support development proposals that: • Do not unduly impact upon amenity, human health and safety and the natural environment by noise,	Chapter 13: Population and Human Health of the ES (Application Document 6.1) and the Health and Equalities Impact Assessment (HEqIA) (Application

Policy	Policy Guidance	Policy Response
	dust, odour and light pollution, vibration and land contamination • Do not pose an unacceptable risk to the quality of the water catchment, groundwater or surface water • Optimise the design, layout and orientation of buildings and the use of green infrastructure to minimise exposure to the above pollutants.	Document 7.10) have considered the impacts of the Project on sensitive land uses as well as proposed mitigation measures to avoid, reduce or remediate these impacts There are acknowledged to be a small number of localised and temporary impacts in terms of noise, dust and light pollution on both human end ecological receptors associated with the construction of the Project. However, these impacts would be satisfactorily mitigated by the implementation of best practice working arrangements through measures secured through the REAC which forms part of the CoCP (Appendix 2.2, Application Document 6.3) and is secured through requirement 4 of Part 1 to Schedule 2 of the dDCO (Application Document 3.1).
Policy 35: Waste Management	The Council will support residential, commercial and mixed use development proposals that: • Provide adequate internal storage space within their premises to enable the occupiers to separate, store and recycle their waste • Provide adequate, secure, external or communal storage facilities on site which allow for the separate storage and collection of waste, reusable items, recyclable materials and compostable waste • Include on-site waste management, which minimises the need for waste transfer, where it is feasible to do so • Allow for convenient and safe access to manage waste, including for older persons or persons with disabilities	Section 11.5 of Chapter 11: Materials of the ES (Application Document 6.1) and Appendix 11.1 (Excavated Materials Assessment (Application Document 6.3)) demonstrate the positive approach the Applicant proposes to take in terms of waste management and recycling by both minimising both the volume of waste produced and the volume sent for disposal. The principles of waste minimisation, recycling and implementing principles of the circular economy / waste hierarchy are secured through the project design and mitigation measures set out in the REAC which forms section 7 of the CoCP (Application Document 6.3) which, in turn is secured through Requirement 4 of Schedule 2 of the dDCO (Application Document 3.1): • MW001 – minimising use of primary materials

Policy	Policy Guidance	Policy Response
	• Allow for convenient and safe access for waste collection services • Implements high quality design solutions to minimise the adverse visual impact of waste facilities on site • Enable waste from mixed-use schemes to be segregated in separate secured areas • Provide innovative solutions to reduce waste at source. All major development proposals must be accompanied by a Waste Management Plan which demonstrates how the criteria set out above will be achieved.	• MW002 – responsible sourcing • MW005 – Pre-demolition surveys • MW006 – Employment of site waste manager • MW007 – Reuse of excavated materials • MW009 – use of Construction Site Waste Management Plans • MW010 & 016 – Site waste management practices • MW011 & 013 – Reuse, recycling and recovery of materials
Policy 36: Low carbon design and renewable energy Shortened Policy	The Council will seek to optimise the energy efficiency of buildings and support low carbon and renewable energy developments including energy efficiency improvements to existing buildings. The Council requires major development proposals to include a detailed energy assessment to demonstrate how the targets for carbon dioxide emissions reduction set out in the London Plan will be met. The Council will require a cash in lieu contribution to the Council's Carbon Reduction Fund on any shortfall to secure the delivery of carbon dioxide savings elsewhere. The Council will require major development to prioritise connection to any existing or planned decentralised energy networks and, where feasible, integrate combined heat and power systems on site.	The Applicant has prepared a Carbon and Energy Management Plan (Application Document 7.19) which sets out how the Applicant will meet the ambition of a 'low carbon construction pathfinder project'. These measures are secured through a specific requirement, Requirement 16 in Schedule 2 of the dDCO (Application Document 3.1) Chapter 15 (Climate) of the ES (Application Document 6.1) assesses the potential 'worst-case scenario' impacts of the Project on greenhouse gas (GHG) emissions and the vulnerability of the Project to climate change during construction and operation. It is supported by a Carbon & Energy Management Plan (Application Document 7.19). This Plan quantifies the likely carbon emissions generated by the project and methods for reducing them and sets out how the Project would contribute to the UK's net zero carbon goal. It shows how the Applicant has acted to reduce emissions by including mitigation measures embedded in the preliminary design and by embedding carbon reductions in the construction

Policy	Policy Guidance	Policy Response
		stage through the procurement process to ensure that the Contractors are contractually bound to comply with relevant commitments made as part of this application. These measures and an explanation of how they would be secured through the REAC (Section 7 of the CoCP, Application Document 6.3) are set out in section 3 of the Carbon & Energy Management Plan.
Policy 37: Mineral reserves	The Council recognises the strategic need for the supply of aggregates and will safeguard mineral reserves in Havering from other forms of development that would sterilise the resource and/or prejudice future mineral extraction. Minerals Safeguarding Areas are designated on the Policies Map. Non-mineral development in safeguarded areas will only be considered where the applicant can demonstrate that: • The development will not sterilise the mineral resource • The mineral concerned is no longer of any value or potential value • The minerals can be extracted prior to the development taking place and this would not render the site unsuitable for the proposed surface development • It is not practicable or economically viable to extract the minerals prior to the development taking place • The development is required for agriculture, forestry or nature conservation or for open air recreation and would be otherwise acceptable	The Project has ensured the safeguarding of mineral resources by evaluating the likely impact on reserves in the Mineral Safeguarding Assessment Report (ES Appendix 11.2, Application Document 6.1) to understand the potential for extractable minerals to be present within the Order Limits. The assessment concludes that MSAs would not be sterilised or precluded from future use. This conclusion has been arrived at in consultation with relevant parties who have been engaged in the process to determine a suitable approach aimed at minimising the effects on, and safeguarding of, mineral resources within the Order Limits. A summary of consultation is included in Table 11.1 of Chapter 11 of the ES: Materials (Application Document 6.1). It is noted in Chapter 5 of this Planning Statement that In the LB Havering area there were safeguarded superficial deposits of sands and gravels. The Council confirmed that the only minerals it wishes to safeguard are the superficial deposits of sands and gravels which are found within the MSA. The authority expressed a preference for reusing any resources extracted as part of the Project, and that minerals that are deemed to be economically unviable or cause a

Policy	Policy Guidance	Policy Response
	• There is an overriding need for the incompatible development.	negative impact on structures or the environment should not be excavated.
Policy 38: Mineral extraction Shortened Policy	A Transport Statement or Transport Assessment (as appropriate) will be required with all applications to determine the potential impacts the proposal may have on the road network and ensure reasonable contributions from the developers are received to maintain the roads. Full consideration should be given to the use of the River Thames for the transportation of any materials as part of any submitted transport statement. With regards to site operations and restoration, proposals will be expected to be worked in a phased manner with agreed mitigation measures in place to ensure that the local environment and amenity value is maintained or improved throughout the lifetime of the development. Restoration should be undertaken in accordance with an approved scheme and on a progressive basis and seek to: • Reduce the reliance on the use of landfill materials • Provide beneficial after-use(s) that secure long lasting community and environmental benefits • Protect the best and most versatile agricultural land. All restoration proposals will be subject to a five year aftercare period. Any ancillary development including processing plant necessary to facilitate the development should be essential, positioned on-site and of a design to limit adverse landscape impact it must be removed from the site as soon as no longer required for the purpose for which it was installed.	A Mineral Safeguarding Assessment Report (ES Appendix 11.2, Application Document 6.3) has been prepared to assess whether the proposed Project route alignment would sterilise the mineral resource capacity within defined Mineral Safeguarding Areas (MSAs) and, if so, whether removal prior to development is warranted. It concludes that, in line with policy guidance for designated MSAs within the affected local authority areas, the opportunity exists for the extraction of mineral resources within the Order Limits, prior to construction. There are, however, areas deemed unfeasible for the prior extraction of mineral resources, due either to adverse environmental impacts or being economically unviable and potentially hazardous to existing infrastructure. Ground investigation has been completed at some locations throughout the Project. Only Thurrock contains areas of minerals that could be considered potentially safeguarded. The Project would be designed to make use of as much site-won excavated material as is reasonable and practicable. Therefore, minerals will be extracted as part of the Project development when located under the footprint of permanent Project features. Given the approximate percentage of resources impacted by the Project route, it is concluded that the Project would not result the unacceptable sterilisation of mineral resources.

Table C.18 The Adopted London Plan (March 2021)

Policy	Policy guidance	Policy assessment
Policy GG1: Building strong and inclusive communities Shortened Policy	Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must: A encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies B seek to ensure changes to the physical environment to achieve an overall positive contribution to London C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city	The development and evolution of the Project has been informed by extensive consultation with stakeholders, community groups, interested parties and the general public. The nature and extent of the consultation undertaken is described in Application Documents 5:2 Statement of Engagement and Application Document 5.1: Consultation Report. The Project has been designed in a way which seeks to demonstrate compliance with relevant legislation and policy including, where relevant local policies and strategies as explained throughout this Planning statement. Community Impacts are reported in Application Document 7.16: Community Impact Report and the wider benefits the Project would deliver are set out in Application Document 7.20: Benefits and Outcomes Document.
Policy GG5: Growing a good economy Shortened Policy	To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must: A promote the strength and potential of the wider city region B seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London	The over-arching aim of the Project is to overcome a significant congestion blockage in the strategic road network which is having significant adverse effects in social, economic and environmental terms. Providing a new crossing of the River Thames and alleviating congestion at the existing crossings would deliver economic benefit and opportunity to the sub-regional economy as described in Application Document 7.1: Need for the Project and Application Document 7.20: Benefits and Outcomes Document.

Policy	Policy guidance	Policy assessment
Policy SD2 Collaboration in the Wider South East	A The Mayor will work with partners across the Wider South East (WSE) to address appropriate regional and sub-regional challenges and opportunities through recently-developed strategic coordination arrangements. B To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE partners to ensure that plan-making is, as far as possible, informed by up-to-date, consistent technical evidence and monitoring. C The Mayor will take account of the views of WSE partners in discharging his Duties to Inform and Consult with authorities beyond London and will respond to their Duty to Co-operate requests for views on Development Plans insofar as they bear strategically on London. D The Mayor supports recognition of long-term trends migration in the development of Local Plans outside London. E The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: barriers to housing and infrastructure delivery (including 'smart' solutions – see also paragraph 9.6.9); factors that influence economic prosperity; the need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality, biodiversity and green infrastructure), waste management, and the promotion of Circular Economies; wider needs for freight, logistics and port facilities and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.	See response to Policy GG5 above. The Applicant has sought to engage not only with the Mayor's Office but with all host authorities to address the wider sub-regional issues and opportunities presented by the Project.

Policy	Policy guidance	Policy assessment
Policy SD3: Growth locations in the Wider South East and beyond	A The Mayor will work with strategic and local authorities, Government and other interested partners to realise the growth potential of the WSE and beyond through investment in strategic infrastructure to support housing and business development in particular in growth locations to meet need and secure mutual benefits for London and relevant partners. B The Mayor supports recognition of these growth locations with links to London in relevant Local Plans outside London. 2.3.8 Figure 2.15 shows London in its wider regional setting. 13 WSE Strategic Infrastructure Priorities have been endorsed by the WSE partners for initial delivery. Eight of these are radial priorities that connect directly to Growth Corridors within London. The remaining five are orbital priorities that can help reduce transit through London and stimulate the WSE economy beyond the capital. 8. Lower Thames Crossing	See response to Policy GG5 above. Support for the Project as a strategic infrastructure priority in the London Plan is noted.
Policy D14 Noise Shortened Policy	A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by: 1) avoiding significant adverse noise impacts on health and quality of life 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses	Chapter 12: Noise and Vibration of the Environmental Statement (Application Document 6.1) assesses the Project's impact on noise and vibration. Within the Greater London Authority area of the Project route (north of the A13 to the M25), Chapter 12 reports that construction noise levels have been predicted during the daytime, evening and night-time period at 42 identified Noise Sensitive Receptors. The assessment has shown that between the A13 and the northern junction of the route alignment with the M25 there are existing noise sensitive dwellings in North Ockendon, as well as

Policy	Policy guidance	Policy assessment
	4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity) 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.	numerous outlying, more isolated dwellings. Noise impacts on these properties have been addressed through decisions about the Project route which seeks to avoid adverse impacts on noise sensitive receptors as far as is reasonably practicable. It is also addressed in measures embedded in the Project design and through working practices during the construction. Section 12.5 of Chapter 12: Noise and Vibration, of the ES (Application Document 6.1) described the Project design and mitigation measures dealing with noise. Mitigation is also secured in the Register of Environmental Actions and Commitments (REAC). The REAC forms part of Appendix 2.2: Code of Construction Practice (CoCP) (Application Document 6.3), which is being submitted as part of the DCO application which contains general construction good practice measures. These measures would be legally secured through dDCO Requirement 4 (Application Document 3.1). There are no designated Noise Important Areas (NIA) identified within this section of the Project. It is concluded that any noise impacts linked to the Project are fully assessed and considered within the bounds of UK legislation, the policy framework and relevant guidance.
Policy S5: Sports and recreation facilities Shortened Policy	B Development proposals for sports and recreation facilities should: 1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling.	The Project would not have a significant impact directly on sports and recreational facilities in London though there are some minor impacts on a part of the Thames Chase in LB Havering (see also response to Policy G4 below).

Policy	Policy guidance	Policy assessment
		Across the Project, there would be some losses of sports and recreational facilities as highlighted in the area chapters of this Planning Statement (Chapters 6, 7 and 8). However, overall, the Project would deliver a net gain in accessible sports and recreational facilities and additional facilities for WCH. New and improved routes for WCH are described in Table 13.54 and shown on Figure 13.4 of Chapter 13 of the ES (Application Document 6.1) dealing with Population and Human Health. There would also be a comprehensive provision of new PRoW and cycleways as a result of the Project including (paragraph 1.4.16 of the TA, Application Document 7.9): • 1.4km of new cycle track • 26km of new shared track (walkers and cyclists) • 3km of new bridleways • 1.2km of new unmade footpaths. Approximately 70 hectares of new country park facilities are being created at both north and south portal areas which would more than compensate for areas lost to the Project.
Policy E11: Skills and opportunities for all Shortened Policy	B Development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that: 1) enable those people undertaking training to complete their training and apprenticeships	The Project is a £multi-billion construction undertaking which would create substantial local employment opportunity. The Benefits and Outcomes Document (Application Document 7.20) identifies target outcomes which aim delivering local skills, increasing local employment, creating increased awareness in construction, and expanding the local supply chain. The Benefits and Outcomes document

Policy	Policy guidance	Policy assessment
	2) ensure the greatest possible level of take-up by Londoners of the training, apprenticeship and employment opportunities created 3) increase the proportion of under-represented groups within the construction industry workforce.	Application Document 7.20 sets the following skills & employment strategy targets: • Apprenticeships – 473 people • Newly Employed – 500 people • Graduates / Trainees – 291 people • Pre-employment programme – 650 people • Training for Local Residents – 350 people • Work Placement – 470 people • Support for Education Leads – 2,000 Hours of support • Education Engagement – 5000 hours • Sector Skills Qualifications – 500 people The Benefits and Outcomes document (Application Document 7.20) elaborate on these employment / skills opportunities. These measures would be secured through a section 106 agreement with the relevant local authorities (Application Document 7.3)
Policy HC1 Heritage conservation and growth Shortened Policy	C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process. D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make	Chapter 6: Cultural Heritage of the Environmental Statement (ES) (Application Document 6.1) examines the potential effects of the Project on cultural heritage during both the construction and operational phases, including effects on archaeological remains, built heritage and historic landscapes. The assessment has been undertaken in accordance with National Highways' Design Manual for Roads and Bridges (DMRB) LA 104 and LA 106, taking into account best practice advice produced by Historic England and the Chartered Institute for Archaeologists. Information

Policy	Policy guidance	Policy assessment
	provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.	regarding the historic environment baseline has been obtained from relevant sources including Historic Environment Records. The importance (significance) of all heritage assets included in the assessment is presented in Appendix 6.1: Deck Based Assessment of the ES (Application Document 6.3), with a summary provided in Section 6.4 of Chapter 6 (Application Document 6.1). The churchyard of St Mary Magdalene (Grade I listed) in North Ockendon is located outside the Order Limits but in close proximity to construction works. Construction activity may result in temporary changes to the setting of this asset by introducing additional noise, lighting and visible construction machinery. However, these activities would be mitigated through the screening of construction compounds with close board fencing, and good construction practice to reduce the dust and noise. The Grade II Listed gatehouse and moat of South Ockendon Old Hall is located within the area of the Greater London Authority (GLA) affected by the Project. The Project route has been assessed as causing no physical impact to the Listed Building's assets or their setting, as the major construction activity would be located at least 600m from the asset and beyond the extent of their setting. There are no Scheduled Monuments or nationally important archaeological remains within the area of the GLA affected by the Project. The potential for undiscovered heritage assets with archaeological interest is identified in Appendix

Policy	Policy guidance	Policy assessment
		6.1 of the ES (Application Document 6.3). A strategy for investigating and recording heritage assets is described below: A framework for archaeological mitigation is set out within the Outline Archaeological Mitigation Strategy (OAMS) in Appendix 6.9 of the ES (Application Document 6.3). This presents a draft Strategy in advance of archaeological evaluation results as the basis to develop a final Strategy. A final strategy would take the form of a Detailed Archaeological Mitigation Strategy (DAMS) and accompanying Overarching Written Scheme of Investigation (OWSI), setting-out the scope, guiding principles and methods for the planning and implementation of essential archaeological mitigation. For each site or area of archaeological interest a Site-Specific Written Scheme(s) of Investigation (SSWSI) would be prepared outlining specific measures that would apply to particular pieces of archaeological fieldwork, to be carried out as part of the programme of archaeological mitigation works.
Policy G1 Green infrastructure Shortened Policy	A London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits. D Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.	A Green Infrastructure Study (Appendix H to this Statement) commissioned for the Project sets out the 'bigger picture' for the delivery of large-scale Green Infrastructure focusing 'on land that is to be safeguarded, managed or secured in positive ways to create a multifunctional network of green spaces and assets for which investment can deliver the greatest range of sustainable benefits.' An assessment of the impact of the project on open spaces can be found in Appendix D and for recreational facilities in Appendix G of this Planning Statement.

Policy	Policy guidance	Policy assessment
Policy G2 London's Green Belt	A The Green Belt should be protected from inappropriate development: 1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist, 2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported. B Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.	Appendix E to this Planning Statement assesses the planning issues associated with the location of the Project within the Green Belt, including that within this part of the Greater London Authority (GLA). The Project as a whole constitutes 'inappropriate' development in the Green Belt. Appendix G sets out the 'very special circumstances' justifying the development of the Project in the Green Belt, based on the following: • The over-riding need for the Project • No viable alternatives • Policy support • Temporary impacts Further details regarding the 'need' case for the Project, as a form of linear infrastructure is provided in the Need for Project (Application Document 7.1).
Policy G4 Open space Shortened Policy	B Development proposals should: 1) not result in the loss of protected open space 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency.	Chapter 13: Population and Human Health in the Environmental Statement (Application Document 6.1) identifies existing and proposed land uses in the vicinity of the Project route and considers the potential effects of the Project on people and communities. The assessment has considered the potential effects of the Project on existing open space, sports and recreational facilities in line with the tests described in the NPSNN. The Project proposes to replace land that would be required for the proposed highway alignment at the eastern boundary of Thames Chase with areas to the south of Thames Chase on the west

Policy	Policy guidance	Policy assessment
		of the M25 and two areas to the north on either side of the M25. The replacement land would be of equivalent size, quality and location to the existing Thames Chases Community Forest and is being developed in collaboration with stakeholders Temporary acquisition of land is also required during the construction phase at Folkes Lane Woodland (which forms part of the Thames Chase Community Forest) as part of enabling works for the widening of the M25 and the provision of a footbridge over the M25 to reconnect the Thames Chase Community Centre to the Land of the Fanns project. A permanent easement would also be required at Folkes Lane for which replacement land is to be provided.
Policy G5: Urban Greening Shortened Policy	A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.	See responses to policies S5, G1 and G4 above. Across the Project as a whole, the Project design includes the creation of green bridges at Brewers Road (over A2), Thong Lane (over A2), Thong Lane (over A122), Muckingford Road, Hoford Road, Green Lane and North Road. The main purpose of green bridges is to maintain and enhance connectivity for WCH as well as creating habitat corridors.
Policy G6 Biodiversity and access to nature Shortened Policy	A Sites of Importance for Nature Conservation (SINCs) should be protected. C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:	Chapter 8: Terrestrial Biodiversity of the Environmental Statement (ES) (Application Document 6.1) assesses the potential effects of the Project on biodiversity during both the construction and operational phases and the likely impacts to important ecological features. The assessment of the construction phase of the Project has identified the effects on a number of

Policy	Policy guidance	Policy assessment
	1) avoid damaging the significant ecological features of the site 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site 3) deliver off-site compensation of better biodiversity value. D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. E Proposals which reduce deficiencies in access to nature should be considered positively.	receptors north of the River Thames, including the following: • No direct impacts on Cranham Marsh Local Nature Reserve (LNR) are anticipated during the construction phase, as the site is located in excess of 220m from the Order Limits. • No direct impacts on Cranham Brickfields LNR are anticipated during the construction phase, as the site is located in excess of 20m from the Order Limits. • No direct impacts on The Manor LNR are anticipated during the construction phase, as the site is located approximately 1.14km from the Order Limits. • Moderate adverse significant effects from construction at Codham Hall Wood Local Wildlife Site and ancient semi-natural woodland and ancient woodland west of M25 junction 29. Construction effects on non-statutory designated sites north of the River Thames are not considered to be significant. The London Riverside Conservation Park remains unaffected by the Project. No direct impacts are anticipated on any statutory and non-statutory designated sites during the operation of the Project. Residual significant effects as a result of nitrogen deposition due to the operation of the Project are predicted for the following sites: • Ockendon Railsides SINC • AW_Theme_ID1420012 AW

Policy	Policy guidance	Policy assessment
		• Codham Hall Wood AW/LWS These residual effects have been compensated through a large habitat creation proposal as shown on Figure 2.4: Environmental Masterplan of the ES (Application Document 6.2). Section 8.6 of Chapter 8 of the ES (Application Document 6.1) identifies the measures proposed to protect and enhance biodiversity and geological conservation interests. Figure 2.4: Environmental Masterplan of the ES (Application Document 6.2) sets out the proposed approach to environmental design through the Project.
Policy G7 Trees and woodlands Shortened Policy	A London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees. C Development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.	An Arboricultural Assessment within Chapter 7: Landscape and Visual of the Environmental Statement (ES) (Application Document 6.1) sets out the Project's impact on existing trees and woodland. The Arboricultural Assessment recommends further arboricultural input during the detailed design stages of the Project. This would include additional surveys and assessments to determine the location and number of verified veteran and ancient trees to aid the retention of high value trees to develop an effective tree protection strategy for those trees considered retainable with protection. Consideration would also be given to root protection area (RPA) extension from nearby trees, particularly in relation to veteran and ancient trees whose RPAs can be significantly larger than other trees. These additional surveys and assessments would be secured in the

Policy	Policy guidance	Policy assessment
		Register of Environmental Actions and Commitments (REAC) (Appendix 2.2 of the ES, Application Document 6.3). Within the area of the Greater London Authority affected by the Project, existing trees within the Thames Chase priority area are likely to require removal, with a small number of tree groups containing newly planted trees to be retained. Mature trees situated along the northern edge of the Thames Chase Visitor Centre, along a watercourse west of the M25 are at risk of being removed. Further north around the junction of the M25 and A127, blocks of ancient woodland on either side of the M25 would require some tree removal closest to the road. Sections of the edges of these two woodlands set further back from the M25 could be retained including the few larger, more mature trees. Potential notable tree loss centres on a cluster of individual trees lining Ockendon Road west of the M25 and on either side of the rail line, comprising of early mature pines and broadleaf species.
Policy SI 1 Improving air quality Shortened Policy	B To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed: 1) Development proposals should not: a) lead to further deterioration of existing poor air quality b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits c) create unacceptable risk of high levels of exposure to poor air quality.	Chapter 5: Air Quality of the Environmental Statement (ES) (Application Document 6.1) sets out the existing air quality conditions (for a Base scenario) and future air quality at the time of opening both without (Do Minimum scenario) and with the Project (Do Something scenario). The assessment concludes that, during the construction phase of the Project, while properties located within 200m of construction activities have the potential to be adversely

Policy	Policy guidance	Policy assessment
	2) In order to meet the requirements in Part 1, as a minimum: a) development proposals must be at least Air Quality Neutral b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1 d) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.	affected by construction dust, these effects would be temporary in nature and suitably controlled using best practice measures and so are not considered to be significant. In terms of operational impacts it should be noted that a reduction in NO2 and PM10 is predicted at receptors between the base year (2016) and opening year (2030) Do-Minimum scenario, as there are expected to be improvements in vehicle emissions over this period (e.g. due to uptake of electric and alternative fuelled vehicles). The assumptions regarding future air quality improvements are supported by trends in local air quality monitoring data, which show an overall downward trend in NO2 across recent years. The air quality modelling results show that the operation of the Project would result in both improvements and deteriorations in local air quality as a result of Project-associated changes in traffic flows. There are 25 human health receptors where an exceedance of the annual mean NO2 AQS objective and a perceptible change in NO2 (i.e. >0.4µg/m3) are predicted in the Project opening year, and these are confined to worst-case receptors on the A282 Dartford Crossing (one medium and three small NO2 improvements), M25 between junction 25 and junction 26 near Holmesdale Tunnel (seven small NO2 improvements), A2 London Road (four small NO2 worsenings) and A228 between M20 junction 4 and M2 junction 2 (five small NO2 improvements and one large, four medium worsenings). The air

Policy	Policy guidance	Policy assessment
		quality effects of the Project on human health are not considered to be significant as: • There are no exceedances of AQS objectives predicted for PM2.5 or PM10 with or without the Project. • Where the Project leads to a worsening in annual mean NO2, the total concentrations predicted are close to 40µg/m3, which suggests there are unlikely to be exceedances of the 1-hour mean NO2 AQS objective. • Where the Project leads to a small or medium worsening in annual mean NO2, the magnitude of change in NO2 is in the mid-range of the magnitude band. • The number of receptors experiencing a small or medium worsening in annual mean NO2 is well below the lower range of the corresponding guideline band in DMRB LA 105. • Although the Project leads to a large worsening at one receptor, the change is just within the large magnitude range and is at the bottom of the large magnitude guideline band in DMRB LA 105. Furthermore, the impact and concentrations are likely to be overpredicted at this receptor as well as other receptors on the A228. The Project is not expected to affect the UK's ability to comply with the Air Quality Directive in the shortest possible timescales. The Project is considered to have a significant effect on 29 designated habitats for ecology

Policy	Policy guidance	Policy assessment
		because of an increase in N deposition, as outlined in Chapter 8: Terrestrial Biodiversity.
Policy SI2: Minimising greenhouse gas emissions Shortened Policy	B Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. E Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.	Chapter 15 (Climate) of the ES (Application Document 6.1) assesses the potential 'worst-case scenario' impacts of the Project on greenhouse gas (GHG) emissions and the vulnerability of the Project to climate change during construction and operation. It is supported by a Carbon & Energy Management Plan (Application Document 7.19). This Plan quantifies the likely carbon emissions generated by the project and methods for reducing them and sets out how the Project would contribute to the UK's net zero carbon goal. It shows how the Applicant has acted to reduce emissions by including mitigation measures embedded in the preliminary design and by embedding carbon reductions in the construction stage through the procurement process to ensure that the Contractors are contractually bound to comply with relevant commitments made as part of this application. These measures and an explanation of how they would be secured through the REAC (Section 7 of the CoCP, Application Document 6.3) are set out in section 3 of the Carbon & Energy Management Plan (Application Document 7.19). Requirement 16 of Part 1 of Schedule 2 of the draft DCO (Application Document 3.1) also requires that no part of the development may commence until a second iteration Carbon & Energy management Plan is submitted to and approved by the Secretary of State.

Policy	Policy guidance	Policy assessment
Policy SI5: Water Infrastructure Shortened Policy	E Development proposals should: 1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided 2) take action to minimise the potential for misconnections between foul and surface water networks.	The Project is supported by an extensive evidence base in Chapter 14: Road Drainage and the Water Environment of the ES (Application Document 6.1) addressing the potential impacts of the Project on the water environment. This includes: • A Water Features Survey (ES Appendix 14.2 Application Document 6.3) • Hydromorphology Assessment (ES Appendix 14.4 Application Document 6.3) • Hydrogeological Risk Assessment (ES Appendix 14.5 Application Document 6.3) • Flood Risk Assessment (ES Appendix 14.6 Application Document 6.3) • Stage 4 Water Framework Directive Assessment (ES Appendix 14.7 Application Document 6.3) The WFD Assessment has concluded, taking into account measures embedded in the Project design, in combination with commitments to methods of construction and compound management which are documented in the CoCP (ES Appendix 2.2, Application Document 6.3) which would prevent or mitigate potential effects on surface, transitional or groundwater bodies (paragraph 8.1.2). It concluded in paragraph 8.1.4 that there would be no deterioration of biological quality, hydromorphology, physicochemical or specific pollutant supporting elements at the surface water body scale, at which WFD compliance is judged. In addition, the Project would not prevent the future attainment of the WFD objectives for each of the respective

Policy	Policy guidance	Policy assessment
		water bodies, nor pose barriers to implementing future measures described in the River Basin Management Plans to achieve these objectives. It is concluded that the Project would result in no detriment to any European designated site or regional or local wildlife designation within the ZoI. It is concluded that none of the activities associated with the Project would prevent or undermine future actions to bring water bodies to 'good' status and no instances have been identified where an Regulation 19 derogation is required. The overall conclusion of Chapter 14: Road Drainage and Water Environment of the ES (Application Document 6.1), taking into account the project design and mitigation set out in Section 14.5 is that there would be no likely significant adverse effects on water environment receptors. Furthermore, requirement 8 of Schedule 2 of the dDCO (Application Document 3.1) requires that no development should commence until details of the surface and foul water drainage system, including mitigation measures, are approved by the Secretary of State and that said drainage must be constructed in accordance with the approved details.
Policy SI 7 Reducing waste and supporting the circular economy Shortened Policy	A Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:	The Project has demonstrated the implementation of the waste hierarchy as described within the Chapter 11: Materials (Application Document 6.1) and Appendix 11.5:

Policy	Policy guidance	Policy assessment
	2) encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products 5) meet or exceed the targets for each of the following waste and material streams: a) construction and demolition – 95 per cent reuse/recycling/recovery b) excavation – 95 per cent beneficial use B Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate: 1) how all materials arising from demolition and remediation works will be re-used and/or recycled 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life 3) opportunities for managing as much waste as possible on site 4) adequate and easily accessible storage space and collection systems to support recycling and re-use 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy 6) how performance will be monitored and reported.	Waste Assessment Supporting Data (Application Document 6.3) of the ES as follows: • Elimination: Section 11.1 of Chapter 11 outlines how the volume of waste generated has been reduced in design. • Reuse/Recycling: Table 2.1 of Appendix 11.1, shows how the Project would divert more than 70% of waste from landfill. Section 11.6 of Chapter 11 demonstrates an acceptable impact to the local recycling/recovery facility capacity. • Disposal: Section 11.3 of Chapter 11 shows that the quantity of waste going to landfill would reduce the capacity in England by <1% and would be likely to represent 2.4% of the landfill capacity in the study area for non-hazardous and 3.8% for inert waste. It should be noted that of the 3.8% inert capacity utilised within the study area, approximately half of this is within the Order Limits and considered to be the best overall sustainable outcome. This shows the Project complies with the legal minimum diversion rate of 70% from the Waste Framework Directive. An Excavated Materials Assessment (Application Document 6.3, Appendix 11.1 of the ES) has been undertaken to demonstrate that sufficient capacity exists in the region to support recovery and diversion from landfill. A number of landfill facilities with void capacity for inert waste have been identified in parts of Kent (as well as Greater London and Essex), including several large landfill facilities.

Policy	Policy guidance	Policy assessment
		Contractors would be required to produce a Site Waste Management Plan (SWMP) or equivalent to set out procedures for the characterisation, management and monitoring of wastes arisings. Chapter 11: Material Assets and Waste of the Environmental Statement (Application Document 6.1) demonstrates that hazardous waste requiring disposal would be most significant during the construction phase of the Project and has identified mitigation measures in Section 11.5 of the chapter on how this would be addressed. Chapter 11 also states that hazardous waste is likely go to local treatment facilities or be subject to remediation where possible. This reflects the distance between the Project and the nearest hazardous landfill site and in order to reduce longer journeys.
Policy SI 10: Aggregates Shortened Policy	A An adequate supply of aggregates to support construction in London will be achieved by: 1) encouraging re-use and recycling of construction, demolition and excavation waste within London, including on-site	Section 11.5 of Chapter 11 (Materials) of the ES (Application Document 6.1) and Appendix 11.1 (Excavated Materials Assessment) outline how the proposed arrangements have sought to minimise both the volume of waste produced and the volume sent for disposal. The Excavated Materials Assessment estimates that the Project would generate approximately 12.35 million m3 of uncontaminated inert ground materials (paragraph 2.1.6). 11.2 million m3 (i.e. the vast majority) of that would be reused and recovered within the Project design (paragraph 2.1.9). Having applied the principles of designing out waste and increasing the reuse and recovery of materials within the design proposals, calculations indicate that there would be a net surplus of approximately 350,000m3 of

Policy	Policy guidance	Policy assessment
		excavated materials to be removed from the Project.
Policy SI 12 Flood risk management Shortened Policy	A. Current and expected flood risk from all sources (as defined in paragraph 9.12.2) across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers. C. Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses. D. Development Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier. E. Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood. F. Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.	The Environment Statement (ES) includes a Flood Risk Assessment (FRA) for the Project at Appendix 14.6 and a Water Framework Directive Assessment at Appendix 14.7 (Application Document 6.3). Consideration of these appendices is contained within Chapter 14: Road Drainage and Water Environment of the ES (Application Document 6.1). The FRA has identified that the Project's Order Limits within the boundary of the Greater London Authority is largely at low risk from flooding, although there is an area of low to high risk of fluvial flooding where the Project crosses the West Mardyke flood plain. The FRA states that the Project would be on embankments in this area which would make the route alignment free from the risk of fluvial and surface flooding. Surface water flood risk from highway runoff would be mitigated in this area by the inclusion of highway drainage provision designed to prevent flooding in the highway without increasing risk elsewhere. The compensatory flood storage and highway drainage system for the Project have been designed to include allowances for projected climate change.

Policy	Policy guidance	Policy assessment
	G. Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.	
Policy SI 13 Sustainable drainage Shortened Policy	B Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy: 1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation) 2) rainwater infiltration to ground at or close to source 3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens) 4) rainwater discharge direct to a watercourse (unless not appropriate) 5) controlled rainwater discharge to a surface water sewer or drain 6) controlled rainwater discharge to a combined sewer. C Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways. D Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation	A strategy for managing operational surface water drainage has been prepared centred on the application of Sustainable Drainage Systems (SuDS), appropriate to local conditions. The Strategy is summarised in Part 7 of Appendix 14.6: Flood Risk Assessment (Application Document 6.3) of the Environmental Statement. The drainage principles have been discussed and agreed with relevant Lead Local Flood Authorities (LLFA), as detailed in Table 14.1 of Chapter 14: Road Drainage and Water Environment of the ES (Application Document 6.1).
Policy T4 Assessing and mitigating transport impacts	A. Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.	The response to this policy against the policy criteria, is as follows:

Policy	Policy guidance	Policy assessment
	B. When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance. C. Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified. D. Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure. E. The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated. F. Development proposals should not increase road danger.	**A. Development Proposals** The Need for the Project (Application Document 7.1) identifies that the Project will provide substantial additional capacity and new route options across the Thames east of London, improving connectivity, both across the River Thames and east/west. **B. Transport Assessment** A Transport Assessment (Application Document 7.9) has been produced as part of this application. The assessment sets out the forecast reductions in journey times for trips crossing the River Thames while the 'Need for the Project' states the benefits to the road network that the Project would bring. Relieving congestion at the Dartford Crossing is a key objective of the Project. Travel Plans for the movement of personnel to and from worksites would be developed by the appointed Contractors following latest guidance and best practice such as that produced by Transport for London (TfL). Travel Plans would be produced by the Contractors for each temporary compound where these are closely located with similar levels of accessibility. These plans would be prepared in the context set by the Framework Construction Travel Plan (Application Document 7.13) and the Outline Traffic Management Plan for Construction (Application Document 7.14) which are both secured by requirements 10 and 11 in Part 1 of Schedule 2 to the dDCO (Application Document 3.1). **C. Impacts on users and proposed mitigation**

Policy	Policy guidance	Policy assessment
		The Transport Assessment (Application Document 7.9) sets out impacts of the Project on users of the road network and proposed mitigation for these. National Highways also proposes to implement a monitoring scheme as defined within the Wider Networks Impacts Management and Monitoring Plan (Application Document 7.12) to monitor the impacts of the Project on the wider network and actively engage with local authorities on the findings and help secure Government funding for further projects to address these impacts. This will be secured in accordance with Requirement 14 of Part 1 to Schedule 2 of the dDCO (Application Document 3.1). National Highways proposes a strategy to monitor the traffic impacts annually on the affected road network after opening to determine whether mitigation is required and to consider what funding is available through the DfT funding processes to enable further highway works. Works during the construction phase would have an impact on rail services linking to London, which would result in some temporary overnight and/or weekend closures on some lines. Construction activities will be coordinated with the railway network operators and would typically be outside of standard working hours, to minimise the disruption to the railway network and its customers and to ensure the safety of construction personnel and railway operations. The construction activities would also impact on a number of bus and coach networks which link to London, which will result in journey time delays.

Policy	Policy guidance	Policy assessment
		The outline Traffic Management for Construction Plans (oTMPfC) Application Document 7.14 would be updated before construction to help minimise these delays, however it is considered unlikely that any further mitigation would be required. These would be prepared within the context set by the Outline Traffic Management Plan for Construction which is secured through Requirement 10 of Part 1 of Schedule 2 of the dDCO (Application Document 3.1) The construction impacts of the Project would impact walkers, cyclists and horse riders (WCH) in the area due to the temporary closure and diversion of routes at various stages and the impacts of this on travel behaviour. Mitigation for these impacts includes the construction of new Public Rights of Way (PRoW) prior to the closure of any existing PRoW where reasonably practicable and implementing active control measures to manage the safety of users including temporary gates and signals. **E. Impacts on Public Health** Chapter 13: Population and Human Health of the Environmental Statement (Application Document 6.1) explains that the Project has been designed to avoid and reduce impacts and effects on human health. A Health and Equalities Impact Assessment (Application Document 7.10) has also been prepared which has informed the assessment of effects within the Chapter. The conclusion reached is that there are unlikely to be any significant effects on population and human health. **F. Road danger**

Policy	Policy guidance	Policy assessment
		The Need for the Project (Application Document 7.1) considers the impact of the Project on safety and notes that, while there is forecast to be more traffic on the road as a result of the Project, primarily as a result of longer journeys, there would be a reduction in the number of accidents within the appraised area, per vehicle mile (travelled over the 60-year appraisal period).
Policy T5 Cycling Shortened Policy	A Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through: 1) supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure	Within the Greater London Authority area of the Order Limits, proposals to improve conditions or pedestrians, cyclists etc include connecting the Ockendon Link and improving walking, cycling and horse riding (WCH) routes. These are designed to complement the Thames Chase Plan's strategy for landscape regeneration through enhanced connected woodland and green space. This includes improved access through enhancements to the 'Forest circle' and creation of interconnected 'Greenway routes' through and around the Thames Chase area.
Policy T7 Deliveries, servicing and construction Shortened Policy	A Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road. J Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites. K During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.	The Code of Construction Practice (CoCP) (ES Appendix 2.2, Application Document 6.3) states that the Contractors would be required to investigate the use of multimodal transport, including the River Thames being used to transport construction materials. Chapter 13: Population and Human Health of the Environmental Statement (Application Document 6.1) sets out the impacts during the construction phase on walkers, cyclists and horse riders (WCH). Tables 13.69 and 13.71 of Chapter 13 describe the WCH routes within the boundary of the

Policy	Policy guidance	Policy assessment
		Greater London Authority (GLA) that would be temporarily severed by the Project, the estimated duration and changes in journey length for users. The Chapter considers that the effects on WCH are likely to be adverse during the construction phase, but once operational a range of enhancement opportunities have been identified to improve the Public Rights of Way (PRoW) network through enhanced facilities and the creation of missing links. All routes within the GLA that are severed temporarily by the Project would be reconnected.

Table C.19 The Joint Waste Development Plan for East London Waste Authority Boroughs (Feb 2012)

Policy	Policy guidance	Policy assessment
Policy W1: Sustainable Waste Management Shortened Policy	The boroughs will aim to drive waste management up the waste hierarchy by promoting waste minimisation, materials reuse, recycling & recovery of resources and help the delivery of national and regional targets for recycling and composting set out in the Waste Strategy for England 2007 and the London Plan by: (iv) require the reuse of construction, excavation and demolition waste during new developments, such as the Thames Gateway, with on-site recycling and use of recycled aggregate wherever possible and encourage use of sustainable transport modes where the movement of waste is necessary.	An assessment within Appendix 11.4 of ES Chapter 11: Material Assets and Waste of the Environmental Statement (ES) (Application Document 6.3), shows that of the total waste arisings from the Project, 82% would be subject to diversion from landfill. This shows that the Project complies with the legal minimum diversion rate of 70% from the Waste Framework Directive. The Project has demonstrated the implementation of the waste hierarchy as described within Chapter 11 and Appendix 11.5: Waste Assessment Supporting Data (Application Document 6.3) of the ES as follows: • Elimination: Section 11.5 of Chapter 11 outlines how the volume of waste generated has been reduced in design. • Reuse/Recycling: Table 1.1 of Appendix 11.5 shows how the Project would divert more than 70% of waste from landfill, and Section 11.6 of Chapter 11 demonstrates an acceptable impact to the local recycling/recovery facility capacity. • Disposal: Section 11.6 of Chapter 11 shows that the quantity of waste going to landfill would reduce the capacity in England by <1% and would be likely to represent 2.59% of the landfill capacity in the study area for non-hazardous and inert waste. It should be noted that approximately 68% of the total inert and non-hazardous landfill capacity (within the study area) used by the Project is

Policy	Policy guidance	Policy assessment
		within the Order Limits (660,000m3 of non-hazardous excavated material) and was considered to be the best overall sustainable outcome. An Excavated Materials Assessment, Appendix 11.1 (Application Document 6.3) has been undertaken to demonstrate that sufficient capacity exists in the region to support recovery and diversion of waste from landfill. Within a locally defined study area, a number of facilities with void capacity for inert waste have been identified in the study area. Contractors would be required to produce a Site Waste Management Plan (SWMP) or equivalent to set out procedures for the characterisation, management and monitoring of waste arisings. The Code of Construction Practice (CoCP) (ES Appendix 2.2, Application Document 6.3) states that Contractors would be required to investigate the use of multimodal transport including using the River Thames to transport construction materials.

Table C.20 Mayor's Transport Strategy (March 2018)

Policy	Policy Guidance	Policy Assessment
Policy 6: Reducing harmful pollution from road transport	The Mayor, through TfL and the boroughs, and working with stakeholders, will take action to reduce emissions – in particular diesel emissions – from vehicles on London's streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures may include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/ levies, responsible procurement, the making of traffic restrictions/ regulations and local actions.	The draft DCO Application for the Project is accompanied by a Transport Assessment (Application Document 7.9) which assesses the transport impacts of the Project. The Benefits and Outcomes Document (Application Document 7.20) notes that one of the over-arching benefits of the Project is that it would reduce vehicular emissions from traffic currently using the Dartford Crossing by providing an alternative route across the River Thames to the east. The TA itself is supported by a number of Application Documents which demonstrate how the Applicant has sought to minimise adverse impacts arising from traffic associated with the Project during its construction. Namely: • Outline Traffic Management Plan for Construction (Application Document 7.14) • Wider Network Impacts Management and Monitoring Plan (Application Document 7.12) • Framework Construction Travel Plan (Application Document 7.13) • Outline Materials Handling Plan in ES Appendix 2.2 Code of Construction Practice (Application Document 6.3) The evidence base also includes an air quality assessment (Chapter 5: Air Quality of the ES (Application Document 6.1) and supporting Appendix 5.6: Project Air Quality Action Plan (Application Document 6.3) which is secured through the CoCP (ES Appendix 2.2, Application Document 6.3) which, in turn is secured through
Policy 7: Achieving a zero carbon city and good air quality	The Mayor, through TfL and the boroughs, and working with stakeholders, will seek to make London's transport network zero emission by 2050, contributing towards the creation of a zero carbon city, and also to deliver further improvements in air quality to help meet tighter air quality standards, including achieving a health-based target of 10 μ g/m3 for PM2.5 by 2030. London's streets and transport infrastructure will be transformed to enable zero emission operation, and the switch to ultra low and zero emission technologies will be supported and accelerated.	

Policy	Policy Guidance	Policy Assessment
		the requirements of Part 1 of Schedule 2 of the draft DCO (Application Document 3.1). The evidence base also includes a Carbon and Energy Management Plan (Application Document 7.19) which sets out the mechanisms the Applicant would use to lead the industry in the adoption of low carbon innovation and deliver the level of carbon reduction required on the Project to support the transition to Net Zero.
Policy 8: Natural and built environment and climate resilience	The Mayor, through TfL and boroughs, and working with stakeholders, will enhance London's natural and built environment by: • Ensuring that transport schemes protect existing green infrastructure where possible or – if there is a loss – providing new green infrastructure in order to deliver a net gain in biodiversity. • Seeking additional opportunities to build new green infrastructure into the existing transport estate. • Monitoring and protecting designated spaces on transport land, such as Sites of Importance for Nature Conservation. • Maximising opportunities to protect, promote and enhance London's built heritage and sites of cultural importance that are affected by transport development.	Each of the relevant policy criteria are addressed in turn below. Green Infrastructure and Open Space Chapter 13: Population and Human Health of the Environmental Statement (ES) (Application Document 6.1) considers the potential effects of the Project on existing open space, sports and recreational facilities in line with the tests described in the NPSNN. A Green Infrastructure Study (Appendix H to this Statement) was commissioned for the Project and sets out the *'bigger picture'* for the delivery of large-scale Green Infrastructure and focuses attention, *'on land that is to be safeguarded, managed or secured in positive ways to create a multifunctional network of green spaces and assets for which investment can deliver the greatest range of sustainable benefits.'* The assessment of the impact of the project on open spaces can be found in Appendix D of this Planning Statement and for recreational facilities in Appendix G. The Project proposes to replace land required for the proposed highway alignment at the eastern

Policy	Policy Guidance	Policy Assessment
		boundary of Thames Chase with areas to the south of Thames Chase, west of the M25 and two areas to the north on either side of the M25. The replacement land is being designed to be of equivalent size and quality to the existing Thames Chases Community Forest characteristics and is being developed in collaboration with stakeholders. Temporary acquisition of land is also required during the construction phase at Folkes Lane Woodland (which forms part of the Thames Chase Community Forest) as part of enabling works for the widening of the M25 and the provision of a footbridge over the M25 to reconnect the Thames Chase Community Centre to the Land of the Fanns project. A permanent easement would also be required at Folkes Lane for which replacement land is to be provided. Heritage Assets Chapter 6: Cultural Heritage of the ES (Application Document 6.1) examines the potential effects of the Project on cultural heritage during both the construction and operational phases. The assessment has assessed the construction and operation effects on archaeological remains, built heritage and historic landscapes in accordance with National Highways' Design Manual for Roads and Bridges (DMRB) LA 104 and LA 106, taking into account best practice advice produced by Historic England and the Chartered Institute for Archaeologists. Within the Greater London Authority area, the Churchyard of St Mary Magdalene (Grade I

Policy	Policy Guidance	Policy Assessment
		Listed) in North Ockendon is located outside the Order Limits but in close proximity to construction works. Construction activity may result in temporary changes to the setting of this asset by introducing additional noise, lighting and visible construction machinery. However, these activities would be mitigated through the screening of construction compounds with close board fencing, and good construction practice to reduce dust and noise.

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