

Lower Thames Crossing

5.4.4.12 Statement of Common Ground between (1) National Highways and (2) Thurrock Council

APFP Regulation 5(2)(q)

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This is a draft Statement of Common Ground with matters outstanding and is unsigned. The draft Statement of Common Ground has been drafted by the Applicant but the stakeholder has not yet been able to complete their review in line with their governance process. The Applicant considers that this Statement of Common Ground presents an accurate description of the matters raised and the status of each matter, based on the engagement that has taken place to date.

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5.4.4.12 Statement of Common Ground between (1) National Highways and (2) Thurrock Council

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1 Introduction

1.1 Purpose of the Statement of Common Ground

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the Development Consent Order (DCO) application for the proposed A122 Lower Thames Crossing (the Project) made by National Highways Company Limited (National Highways) to the Secretary of State for Transport (Secretary of State) under section 37 of the Planning Act 2008.
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application Documents. All documents will be available on the Planning Inspectorate website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties named below, and where agreement has not been reached. Where matters are yet to be agreed, the parties will continue to work proactively to reach agreement and will update the SoCG to reflect areas of further agreement. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific matters that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared in respect of the Project by (1) National Highways, and (2) Thurrock Council.
- 1.2.2 National Highways became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing National Highways made provision for all legal rights and obligations of the Highways Agency, including in respect of the Project, to be conferred upon or assumed by National Highways.
- 1.2.3 Thurrock Council is a host authority in respect of the application and as such is a category 'A' local authority under section 43 of the Planning Act 2008.

1.3 Terminology

- 1.3.1 In the matters table in section 2 of this SoCG, "Matter not agreed" indicates agreement on the matter could not be reached following significant engagement, and "Matter under discussion" where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. "Matter agreed" indicates where the issue has been resolved.
- 1.3.2 If any new matters arise Thurrock Council reserves the right to comment on those matters as it considers appropriate.

1.4 Overview of previous engagement

- 1.4.1 A summary of the meetings and correspondence undertaken between the two parties in relation to the Project is outlined in Appendix C.

1.5 Status of the Statement of Common Ground

- 1.5.1 While National Highways have worked closely with Thurrock Council in the preparation of this document, Thurrock Council has not yet been able to complete their review of this Statement of Common Ground in line with their governance process. This Statement of Common Ground is therefore presented as National Highways understanding of the status of discussions with Thurrock Council. This Statement of common Ground is therefore an ‘unsigned’ Statement of Common Ground.
- 1.5.2 National Highways considers that this Statement of Common Ground is an accurate description of the matters raised by Thurrock Council and the status of each matter, based on the engagement that has taken place to date, as set out in Appendix C.

2 Matters

2.1 Matters agreed, not agreed or under discussion

- 2.1.1 Table 2.1 details the matters which have been agreed, not agreed, or are under discussion between (1) National Highways and (2) Thurrock Council. There are 285 matters in total.
- 2.1.2 It is acknowledged there are some matters where further discussion may take place during the detailed design stage of the Project to finalise detail, but the matter is agreed in principle. These are marked as Matter Agreed subject to review of DCO documents.
- 2.1.3 Matters marked with as 'Matters Agreed *' have been technically agreed with the Council's officers and which are subject to subsequent approval by the Council's members.

Table 2.1 Matters

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
DCO and Consents					
Transfer to third parties, Article 8(5)	2.1.1	The Council is concerned that proper due diligence to support the inclusion of those bodies listed in article 8(4) has not been carried out. Instead, National Highways is asking the Council to raise concerns. The effect of article 8(4) is to remove the need to get Secretary of State approval at a later date. National Highways therefore needs to ensure that it has provided sufficient detail to the ExA to justify the	National Highways confirm that the transferees listed in article 8(5) have been informed by discussions with the relevant bodies. Consideration has been given to the statutory position of these bodies to ensure that they have responsibility for the relevant network or apparatus. This is to ensure that the transferees are capable of and committed to meeting the obligations. A review of other consented DCOs indicates that a DCO can make provision for the transfer of assets, without consent, to a number of unnamed bodies who hold electricity and gas licences, or who are established port authorities. The Project dDCO is, therefore, in line with the accepted practice and will ensure appropriate transfer and	Draft Development Consent Order (3.1)	Matter Not Agreed

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
		removal of the need to get Secretary of State consent. It is the Council's opinion that this is not yet been done.	operation of these assets. We reiterate that the bodies under article 8(5) are established utility undertakers. For completeness, the ability to transfer without consent does not apply in respect of the liability to pay compensation for the acquisition of land and rights meaning that landowners will not be prejudiced by this provision.		
Ancillary works, Schedule 1	2.1.2	The Council welcomes the addition of the wording which limits the works to those which do not give rise to materially new or materially different environmental effects when compared with the environmental statement. We are still concerned about the breadth of the powers, and therefore the ability of those potentially affected to meaningfully engage in the DCO Examination process at this stage. However, the Council proposes raising these at Examination.	National Highways has considered whether each one of the ancillary works is required. The dDCO is worded in accordance with many consented highway DCOs from across the country, there is nothing unique or specific in relation to LTC and the powers sought that would justify a departure from this established and accepted wording. The ancillary works in Schedule 1 of the dDCO cannot be considered in isolation. The dDCO requires that the Project is designed in accordance with the works plans and general arrangements (see Requirement 3 of the dDCO); the rights and restrictive covenants which can be acquired are limited for the plots and purposes in Schedule 8; and temporary possession powers are limited to the purposes specified in Schedule 11 for plots listed therein. These controls, amongst others, therefore, impose an important limitation on the use of the ancillary works powers. We have repeatedly asked the Council to set out which of the ancillary works powers it considers to be wide ranging. National Highways has amended the wording to include ensuring that there are no ' <i>materially new or materially different environmental effects</i> ', as suggested by the Council, something which we consider	Draft Development Consent Order (3.1)	Matter Not Agreed

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
			is not necessary but have done in attempt to reduce the outstanding matters between the parties.		
Discharge of requirements	2.1.3	<p>The Council consider that Schedule 2, requirements: Requirements 3 (design), 4 (EMP), 5 (landscaping), 8 (surface and foul water drainage at a local level (with the Environment Agency responsible for those elements not at a local level), 10 (traffic management), 11 (fencing), 14 (amendments to approved details) and a new Requirement regarding approval of a scheme for the removal of compounds should be discharged by the relevant local planning authority with an appeal to the Secretary of State.</p> <p>Whilst it is not unusual for the Secretary of State to be the discharging authority for highways DCOs, it is not universal. On the facts of this particular matter we consider that the Council, in relation to its area, is best placed to be the discharging authority. The reasons for this have been set</p>	<p>The Planning Act 2008 was introduced for Nationally Significant Infrastructure to expedite the delivery of these projects.</p> <p>National Highways considers the Secretary of State to be the most appropriate discharging authority for the Project dDCO. The Explanatory Memorandum (Application Document 3.2) provides a justification for the Secretary of State being the discharging authority. In short, there are a number of local authorities across the Project and the need for consistency in decision making which warrants one discharging authority. The Requirements reflect the arrangements made in June 2016 whereby the Department for Transport agreed to be the competent authority signing off compliance with the requirements for DCOs promoted by National Highways. As a result of this arrangement, there is a specific team within the Department for Transport to deal with the discharge of requirements.</p> <p>The Council will be consulted on the discharge of requirements 3, 4, 5, 6, 8 and 10 (in addition to any variation to the limits of deviation under article 6). In relation to fencing, paragraph 12 provides for any departures from the manual to be agreed by the Secretary of State, following consultation with the relevant planning authority on matters related to its functions. Under paragraph 18 of Schedule 2 of the dDCO, representations from the Council will be provided to the Secretary of State and so its views will be properly</p>	<p>Draft Development Consent Order (3.1) Explanatory Memorandum (3.2)</p>	Matter Not Agreed

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
		<p>out in more detail in correspondence with National Highways, however in summary, it is the Council's position that it will be quicker, cheaper and more efficient for the relevant local planning authority, who is the relevant experience to be the body discharging the requirements.</p>	<p>represented to, and considered by, the Secretary of State.</p> <p>Where appropriate, the dDCO provides for a proportionate local authority approval function (e.g. under article 17, consent of a local traffic authority must be obtained for any traffic regulation measures under that article).</p> <p>Paragraph 17 of Schedule 2 to the dDCO provides that the local planning authority will approve any amendments to approved details to the travellers' site in Thurrock (see requirement 13), for which the Council is the discharging authority. Amendments to the detailed design must be agreed in writing by the Secretary of State, following consultation with the relevant planning authority, providing that the Secretary of State is satisfied that any amendments would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement (see requirement 3).</p> <p>National Highways do not consider it necessary to include a new requirement regarding approval of a scheme for the removal of compounds in light of article 35(6) of the dDCO which requires restoration, and the controls contained in the outline Landscape and Ecology Management Plan (secured under Requirement 5). Indeed, such the provision of an additional scheme may conflict or duplicate the measures secured in the Landscape and Ecology Management Plan.</p>		
Timeframes for	2.1.4	The Council consider that the period of at least 28 days for	National Highways do not accept that the consultation period in connection with the requirements in Schedule 2	Draft Development	Matter Not Agreed

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consideration of requests for consent 12(8); 17(6); 19(8); 21(6); Sch 2 / Sch 14		consultation, which can be extended to 42 days when requested by the Council, is potentially too short. The Council suggest that this is not included within the DCO and is instead a guide to be used by National Highways to engage with the Council for an opinion on what is an appropriate consultation period prior to sending out a consultation and to include that pre consultation period more formally.	is "too short". In response to the Council's comments, a mechanism has been introduced whereby the consultation period can extend from 21 days to 42 days. The time periods strike an appropriate balance between the Council's interests and the public interest in expeditious delivery of nationally significant infrastructure. The submissions to the Secretary of State under Schedule 2 relate to matters which are the subject of control documents (e.g. outline management plans) which will have already been through examination and extensive consultation/engagement themselves. In relation to the deemed consent period under article 12, 17, 19 and Requirement 13, if the Council consider insufficient time or information had been provided, it could refuse the relevant application. There is nothing in the dDCO which would prevent the Council from refusing an application in this case. Following which, National Highways would determine whether it would utilise the appeal process (endorsed by the Council) or re-submit an application. In circumstances where the Council considers it reasonable to refuse an application, and an application is re-made, it would be within its gift to grant the application sooner than the 28-day period. National Highways consider the provisions are justified given the need to deliver the Project.	Consent Order (3.1)	
Timeframes for consideration of requests for	2.1.5	All deemed consenting periods are set at 28 days, regardless of what is being consented, when the application for consent is submitted (for example during purdah) and	National Highways considers the deemed consent provisions to be reasonable and necessary, having regard to the significance of this Project and the far-reaching consequences a failure to reach a decision in an expeditious manner could have on its delivery. National Highways has proposed a reasonable period of	Draft Development Consent Order (3.1)	Matter Not Agreed

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consent , Articles 12(8); 17(6); 19(8); 21(6); Sch 2 / Sch 14		how much information has been provided to the Council. It is a Council's position that there should be the formal ability for longer periods to be agreed between the parties, both prior to the consultation commencing and during the consultation. This can only be to the advantage of both parties and public interest generally. The Council wish to have a productive working relationship with National Highways, and it is envisaged that this would be an important area of flexibility. Failure to have this flexibility is going to lead to matters unnecessarily going on appeal to the Secretary of State. An example of when this could be appropriate is Requirement 12, where sensitive nature of the matter may require a longer period for determination, including normal democratic processes. To provide greater certainty there could be a limit to the grant of further	time for the Council to determine such requests for approval, given the Council will have had time during the consultation and examination to better understand the particular impacts and proposals forming part of the DCO (in comparison to any usual approval unrelated to a DCO). The deemed consent provisions only take effect in relation to a failure to reach a decision, rather than a failure to give consent. If the Council consider insufficient time or information had been provided, it could refuse the relevant application. There is nothing in the dDCO which would prevent the Council from refusing an application in this case. In circumstances where the Council does not consider it has received appropriate information, or it requires more than 28 days, there is no provision in the dDCO which prevent the refusal of an application. Following such a refusal, National Highways would determine whether it would utilise the appeal process (endorsed by the Council) or re- submit an application.		

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		extensions, for example 3 months.			
Deemed consent 12(8); 17(6); 19(8); 21(6); Sch 2 / Sch 14	2.1.6	<p>The Council is of the view that the principle of deemed consent is not in the public interest. National Highways states that it is required due to the need to deliver the project in an expeditious manner. From the Council's perspective it can only help the Project to be delivered in an expeditious way if either:</p> <p>a) the Council failed to respond and therefore a decision is made without proper scrutiny, or</p> <p>b) the pressure of the tight timeframes focuses the Counsel's resources on applications by National Highways. In relation to b) the same pressure could be exerted through use of deemed refusal provisions.</p> <p>The Council is of the opinion that there should be provision to agree a short extension in specific scenarios. For example, it could be that the</p>	<p>We refer to our comments directly above under Item 2.1.5. Deemed consent is a concept that is well precedented (e.g. article 12(6) of the A19/A184 Testo's Junction Alteration Order 2018, article 15(6) of the A30 Chiverton to Carland Cross Development Consent Order 2020, article 13(8) of the Southampton to London Pipeline Development Consent Order 2020 and article 15(6) of the A303 Sparkford to Ilchester Dualling Development Consent Order 2021.</p> <p>National Highways do not consider the use of a deemed refusal to be the optimal mechanism for delivering the Project in an expeditious manner, particularly in light of the precedented approach for deemed consent set out above. The planning system is based on a presumption in favour of development, the presumed consent is in line with this fundamental principle of the NSIP system. The consequences of a deemed refusal triggering an appeal to the Secretary of State could add delay to the delivery of the Project.</p>	Draft Development Consent Order (3.1)	Matter Not Agreed

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		<p>Council requires some additional information and National Highways isn't able to provide this within the 28 day period. With this information the Council might be able to provide consent within a 35-day period, but the current provisions mean that it would have to appeal to the Secretary of State. The Council cannot understand how that can be considered more efficient, or a better use of public funds. The Council emphasises that the Council is suggesting the ability for both parties to agree a short extension - not an automatic right. If National Highways considered that it would be more efficient to go straight to appeal, then it could do so. However not allowing the parties the choice to agree a short extension appears to be counter-productive. To provide greater certainty there could be a limit to the grant of further extensions, for example 3 months.</p>			

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		<p>The fact that the Council will have a better understanding of the Project aims compared to an approval unrelated to a DCO, does not justify the reduction in the time period from 1 month to 3 months (as would have been the case for a new Traffic Regulation Order). This is exacerbated by the fact that there is still significant uncertainty caused by wide powers, which make it impossible for the Council (of the public) to fully understand all the impacts of the project at this stage. For example, because of the wide ancillary works powers in schedule 1 of the dDCO and limits of deviation not being limited to the Order Limits.</p>			
Modification of the permit scheme, Article 9	2.1.7	<p>The Council have raised comments in relation to Article 9 of the draft DCO which amends a number of provisions in the New Road and Street Works Act 1991 (NRSWA). The Council have commented on the disapplication of sections 56,</p>	<p>Unlike the Project dDCO, the Port of Tilbury (Expansion) Order 2019 does not provide for the permit scheme to apply to the authorised development. The Project dDCO is therefore providing far more comfort than the precedent referenced. We re-emphasise that article 9 explicitly requires the utilisation of the road booking systems under permit schemes (which are subject to modifications which would otherwise be disapplied). We consider that the Council's position is overstating the</p>	<p>Draft Development Consent Order (3.1) Outline Traffic Management Plan for</p>	Matter Not Agreed

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		<p>56A, 58, 58A and 74A of the NRSWA.</p> <p>The Council has found that when these provisions of the NRSWA have previously been disapplied, for example for Tilbury 2, it has significantly impacted the Council's ability to coordinate effectively. Previously granted permits were revoked, which led to delay for Statutory Undertakers for their programme works, which had been previously discussed and coordinated. It rendered not only the roads directly affected by the works as a 'sterile zone' for works, but also a larger area consisting of the diversion, which were set up on unsuitable roads, e.g. Gun Hill. This in addition caused unnecessary complaints, because the established processes were not followed, and mitigation measure could not be enforced.</p> <p>The Council, as Street Authority has a duty under the NRSWA to manage its street</p>	<p>impact on the road network because it does not consider the specific controls which are being proposed.</p> <p>National Highways refer to section 3.1.6 of the outline Traffic Management Plan for Construction which explicitly states that <i>"The Project intends to utilise the existing road booking system operated by the respective local highway authority, to aid management and integration of other schemes. In addition, the appointment of a Traffic Manager (see paragraph 3.3.10) and the establishment of a Traffic Management Forum (see paragraph 3.3.11) will enable timely discussions to be held regarding the detailed location, extent and type of traffic management to be used prior to SoS approval of the TMP."</i></p>	Construction (7.14)	

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		network and works within those streets such that delays are minimised and safe operation of the network is maintained. If the Council is not in a position to effectively co-ordinate all works on its network, the risk of conflicting street works is increased, and the Council will then not be fulfilling its duty. Having two determining Street Authorities operating on the same section of network risks conflicting street works being approved, resulting in significant traffic disruption (and potentially significant economic, environmental and social issues in the local area and restricting access to emergency vehicles). Although the Traffic Management Forum (TMF) may well help resolve issues there is still uncertainty regarding its setup and terms of reference therefore this modification is unwarranted.			
Exemption of section 56 of	2.1.8	Key concern of the Council is lack of coordination to works. Disapplying sections 56 and	Nationally Significant Infrastructure Projects are located across multiple local authority areas and require a consistent approach to follow for the implementation of	Draft Development	Matter Not Agreed

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NRSWA (ability of the Council to give directions as to the timing of works), Article 9(3)		56A of NRSWA is also a significant problem as it could lead to clashes and wider network impacts on the network. Ultimately, the Council needs full control of its highways network so that it can be managed effectively. It is accepted that it would not be in the public interest to delay the project. However, there is a real risk that having two street authorities operating on the same section of network risks conflicting street works being approved. This could lead to significant economic, environmental and social issues in the local area, as well as impacts on the emergency services.	the consent. In light of the potential for inconsistencies between the DCO (if made), and the provisions of New Roads and Street Works Act, 1991 (NRSWA), it is proportionate to disapply these provisions. The Council making directions under these provisions is likely to lead to delays and has the potential to lead to works which do not form part of the scope of the environmental assessments, and for which separate consent may be required even though a DCO has been granted. The Secretary of State has accepted the principle that on National Highways projects, these provisions are to be disapplied. The management of these impacts is dealt with via the Traffic Management Plan required post-DCO. The outline Traffic Management Plan for Construction sets out how management would be dealt with. National Highways refer to sections 3.2.2 and 3.2.3 of that documents which sets out how such interfaces will be appropriately managed, in addition to the (i) consultation on the Traffic Management Plan; and (ii) the Traffic Management Forum proposed.	Consent Order (3.1) Outline Traffic Management Plan for Construction (7.14)	
Exemption of section 56A of NRSWA (ability of the Council to give directions as to the	2.1.9	The Council's position is that this exemption should only apply in respect of specified numbered works, but not when National Highways is using its general ancillary works powers in dDCO Schedule 1. There is the potential for ancillary works to have significant traffic impacts and	The Council appears to misunderstand the application and the role of ancillary works in Schedule 1, which are carried out in connection with the numbered works. National Highways understand that, subject to final confirmation, this matter could be agreed.	Draft Development Consent Order (3.1)	Matter Under Discussion

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placing on apparatus), Article 9(3)		therefore section 56A should only be disapplied in relation to the agreed works drawings, not the ancillary works in connection with them.			
Exemption of section 58 (restrictions on works following substantial road works) and 58A (restrictions on works following substantial street works) of NRSWA, Article 9(3)	2.1.10	<p>Sections 58 and 58A provide the power for the Council to restrict works following substantial street and road works. This is to protect the integrity of works undertaken to streets.</p> <p>The Council has commented on why it considers the TMP is unlikely to be sufficient (due to being prepared early in the programme, and not giving precise dates for work being carried out).</p> <p>The Council understands the need for the Project to progress smoothly, however, this is best achieved through a joined-up and agile approach and having a joint Network Management Team or through the provision of additional resources to the Council's team. The Traffic Management Plans, which are to be</p>	<p>The applicant has sought to communicate the scope and process proposed in the DCO to manage construction impacts on the road network. The dDCO does incorporate measures to ensure network management, including the establishment of a Traffic Management Forum, and ensuring consultation on a Traffic Management Plan. We also emphasise that in a number of provisions that the Council is required to be consulted or in respect of which, it has an approval role (e.g., article 12 on temporary restrictions on roads, article 17 on future traffic regulation measures). It is for that reason that the provision of further safeguards is disproportionate. National Highways has considered the creation of a Joint Network Management Team but considered this to be unnecessary because it replicates controls already proposed.</p> <p>National Highways requires the disapplication of the powers in Section 58 and 58A of the NRSWA because a NSIP of this scale and nature will be implemented in phases and the Applicant requires control over the construction phases in order to ensure efficient and timely implementation of the Project.</p>	Draft Development Consent Order (3.1)	Matter Not Agreed

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		<p>prepared by the works contractors will be required to provide a robust view of the works that will be carried out and the temporary traffic management that will be required to allow those works to happen, however, those documents are by necessity prepared early in the Project programme and will not give the precise dates that sections of works will be carried out. The Street Authority has to be sufficiently agile to respond to rapidly changing demands on the management of its streets and will need to have current and correct details of street works in order to effectively manage the network. The consented Traffic Management Plans will have their purpose for general governance of the traffic management strategies for Project, but will not have the refined detail at the level required for Street Works management. It will be to the benefit of both the Council, as Street Authority, and Highways England to have a well co-</p>			

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		ordinated Street Works register managed by one body, which has to be the Council.			
Future Section 74A orders under NRSWA.	2.1.11	<p>It is not the position of the Council that charges should be made by National Highways. However, Article 9(11) means that future charges in an order from the Secretary of State does not bind National Highways. This is flawed for a number of reasons, including: Parliament cannot bind itself – so any future order could simply disapply this requirement; It is contrary to established convention.</p> <p>We note that the draft Development Consent Orders for the M25 Junction 10 and Junction 28 schemes both contain provisions which apply to orders which have not yet been made under section 74A of NRSWA. However, it does not appear that the legality of these provisions have been raised during the Examination. The Council considers that it is</p>	<p>Article 9(11) ensures that National Highways, as a public body and highway authority, is not charged for carrying out works associated with a nationally significant infrastructure project under a future road charges scheme.</p> <p>National Highways do not accept the Council's view that article 9(11) is contrary to established convention. The Applicant's review of made DCOs shows that they often refer to unmade legislation such as the consented DCOs for the following projects:</p> <ul style="list-style-type: none"> • article 10(11) of the M25 Junction 28 Development Consent Order 2022 • article 11(12) of the M25 Junction 10/A3 Wisley Interchange Development Consent Order 2022. 	Draft Development Consent Order (3.1)	Matter Not Agreed

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		appropriate to raise this at Examination.			
Defect correction period for infrastructure constructed by National Highways as part of the project, and on completion transferred to the Council to maintain, Article 10	2.1.12	The Council's concern is that roads will be transferred to the Council to maintain that contain defects that were not capable of detection on completion. National Highways should not try to push cost of defects in its construction (as opposed to maintenance) to another public body. The Council suggest that this should be 52 weeks, as it standard on all contracts under NEC (New Engineering Contract) and may help, in the Council's experience, deal with settlement around structures and earthworks. We still need to see the proposed side agreement or Detailed Local Operating Agreement (DLOA) which may address this point regarding how the Council takes over maintenance of parts of the network if certain conditions are met.	Under National Highway's licence issued by the Secretary of State, it has statutory responsibility for the strategic road network. In particular, in exercising its functions and duties in relation to the strategic road network, National Highways must act in a manner which it considers is best assessed to ensure efficiency and value for money (paragraph 4.2(d)) and must demonstrate how it has achieved value for money (paragraph 5.12(c)). National Highways note that funding for the operation and maintenance of the local road network is a matter which ordinarily forms part of central government funding decisions. Accordingly, insofar as the Project involves the Council incurring expense for the management of the local road network, this is matter between DfT and the Council. Introducing a new funding mechanism for the local road network separate from these existing processes is not the role for projects promoted by strategic highway authorities under the Planning Act 2008. The Project draft DCO is consistent with complex infrastructure projects such as the A14 Cambridge to Huntingdon and A428 Black Caxton project in this regard. National Highways have discussed the proposed content of the future DLOA, which would be prepared once a contractor has been appointed. Requirements to be covered by the DLOA are set out in the oTMPfC.	Draft Development Consent Order (3.1)	Matter Not Agreed
Article 6(2)	2.1.13	The Council is of the view that article 6(2) causes uncertainty.	The purpose of this provision is to provide National Highways with a proportionate degree of flexibility when	Draft Development	Matter Not Agreed

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		<p>The Council appreciates the need for flexibility and the use of limits of variation. It is the fact that the Project has not yet been designed in detail which necessitates the need for limits of deviation. The Council's concern is regarding the use of article 6(2) which creates additional significant uncertainty. This uncertainty arises because where there are no materially new or materially different environmental effects there is in essence no limit to the deviation. This means that issues such as visual impact and the impact on private rights might not be properly considered. It is possible that deviations could be so significant that individuals did not consider that they needed to make representations in relation to the currently proposed Project, but in fact are adversely affected by the Project which is constructed. This is significantly exacerbated by the fact that</p>	<p>constructing the Project, reducing the risk that the Project as approved cannot later be implemented for unforeseen reasons but at the same time ensuring that any flexibility will not give rise to any materially new or materially different environmental effects. National Highways does not consider it is appropriate to curtail flexibility where the Project remains within the envelope of its environmental assessments. Curtailing flexibility gives rise to the potential for increased costs for tax payers and potentially reducing the ability to pursue environmentally better solutions at the detailed design stage by restricting flexibility. The Project dDCO is consistent with the M42 Junction 6 Development Consent Order 2020.</p> <p>The Applicant does not agree that flexibility equates to "uncertainty" because the impacts of the Project's environmental impacts will have been assessed (and it will not be permitted to apply for a variation which would exceed those impacts); and National Highways will have no compulsory acquisition outside of the Order limits (meaning there is certainty for landowners and occupiers about the extent of such powers).</p>	Consent Order (3.1)	

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		<p>the use of limits of deviation are not limited to the Order Limits. National Highways states that 'it is not understood what the Council's concern with this approach is where, as is accepted, no land outside the Order land is proposed to be compulsorily acquired'. The Council's concern is not the use of compulsory purchase powers outside of the Order Limits (it is clear that this is not possible). However, there is nothing to stop National Highways purchasing land by agreement. This could still result in significant construction outside of the Order Limits, which has not been properly considered at Examination.</p> <p>It is accepted that it is relatively unlikely that this scenario will occur. However, it is unclear why there should be this risk, or indeed what benefit National Highways achieves by not linking the limits of deviation to the Order Limits.</p>			

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Limits of deviation only limited by materially new or materially different environmental effects in comparison with those reported in the Environmental Statement, Article 6(2)	2.1.14	The Council would like National Highways to include non-environmental effects and additional land requirements as constraints within the wording of the order relating to limits of deviation. The use of limits of variation should not negatively materially impact land or buildings which have not be identified as part of the application and examination process. It is important to allow all those possibly affected to make representations.	<p>This provision is necessary for the Project because it has not yet been designed in detail. It is necessary to have a proportionate degree of flexibility when constructing the Project, reducing the risk that the Project as approved cannot later be implemented for unforeseen reasons but at the same time ensuring that any flexibility will not give rise to any materially new or materially different environmental effects.</p> <p>National Highways have requested examples of an impact which it considers is not covered by the Secretary of State's established and preferred terminology ("materially new or materially different"). The Council suggested Noise and Flooding were examples of such impacts. However, the Applicant considers that the Environmental Statement provides detailed assessment and proposed mitigation of these effects which would therefore fall within the limitations set out in the DCO regarding any material change to the Project.</p>	Draft Development Consent Order (3.1)	Matter Not Agreed
Extent of Pink Land (which is land proposed for permanent acquisition)	2.1.15	The Council does not dispute that the power in Article 28 has precedent or that it may be appropriate for the power to apply to some area of the Order Lands. The Council are exploring more detailed justification for pink and blue land with the land and property team. We have yet to discuss	National Highways emphasises that the land included in the Order limits is both necessary and proportionate to ensure the expeditious delivery of the Project. Reasonable steps to reduce the extent of 'pink land' have been taken, and National Highways will continue to identify areas of opportunity to reduce the amount of permanent acquisition land required as the detailed design for the project is developed.	Draft Development Consent Order (3.1)	Matter Not Agreed

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), Article 28		how such detail will be included within the Statement of Reasons (SoR). We are concerned that National Highways have not taken all reasonable steps to reduce the area of 'pink' land as much as possible, as we understand some is due for hand-back.			
Time Limit for acquisition , Article 27	2.1.16	The Council is concerned at the potential negative impact of having an 8-year period for acquisition. Even if the 8-year period applies across the whole site, it must be possible to reduce this time limit across a large number of plots. The Council are looking for this period to be reduced to 5 years, in line with the majority of highways DCO's, or for a more detailed justification as to why 8-years is required.	<p>In response to the comments raised by Thurrock Council, National Highways have reduced this period from 10 years to 8 years, as a result of detailed consideration of this matter. The Project is of a scale similar to projects such as the Hinkley Point C Connection and Thames Tideway Tunnel authorise, respectively, an 8-year and 10-year compulsory acquisition period. The Silvertown Tunnel Order 2018 is a significantly smaller project with less extensive compulsory acquisition which corresponds to the time limit of 5 years. National Highways considers the time period to be necessary and proportionate taking into account the length of the construction programme, the complexity of the Project and the fact that the Project includes a number of long-term assets which will need to be completed even after the main construction period. An 8-year period will ensure that National Highways can progress its design and works to a stage where permanent acquisition can be minimised.</p> <p>It is considered setting out differing periods of compulsory acquisition rights for different plots would give rise to significant uncertainty about the interconnection between the works, and works and could</p>	Draft Development Consent Order (3.1)	Matter Agreed

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			lead to acquisition of land which could otherwise be left in a landowner's possession. National Highways are not aware of any DCO, nor Hybrid Bill for comparable projects, containing such a mechanism. The Statement of Reasons will include an appropriate justification for the compulsory acquisition period.		
Power to maintain land after works completed , Article 36	2.1.17	The Council does not dispute the relevance of the power to maintain land after works have been completed but considers that further efforts should be made to reduce the area of land to which this power is subject (which is in place in addition to the 5 or 8-year period).	National Highways consider the provision is appropriate as it imposes a lesser burden than permanently acquiring rights to achieve the same purpose. The power does not apply with respect to houses, gardens or any other buildings for the time being occupied. This drafting reflects provisions in the Northumberland County Council (A1- South East Northumberland Link Road (Morpeth Northern Bypass Development Consent Order 2015), the A14 Cambridge to Huntingdon Improvement Scheme Order 2016 and the Silvertown Tunnel Order 2018.	Draft Development Consent Order (3.1)	Matter Not Agreed
Replacement 'special category' land, Article 40	2.1.18	Special category land concerns land referred to as such in the special category land plans and includes land forming part of a common, open space or allotment. Article 40(1) requires National Highways to prepare a scheme for the provision of the replacement land including a timetable for the implementation of the scheme. That scheme must be approved by the Secretary of	Article 40(1) mirrors the requirement in the Port of Tilbury (Expansion) Order 2019 (referenced by the Council in the October Report) and the Model Provisions in that it states that "...the special category land and any rights over that land is not to vest in the undertaker (or any specified person) until the replacement land has been acquired in the undertaker's name or is otherwise in the name of the persons who owned the special category land on the date those powers are exercised..". In effect, the replacement land must have been acquired (either by National Highways or the in the name of the relevant third party) before any special category land can vest in National Highways. The dDCO goes beyond this requirement and, in addition to the replacement land	Draft Development Consent Order (3.1)	Matter Not Agreed

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		State prior to vesting of any special category land. Amendments have been agreed between the Council and National Highways. However, the Council still consider that the scheme of works for the replacement 'special land' should be completed and agreed prior to the vesting of the current 'special land' in National Highways.	having to be acquired, requires a scheme to also have been approved by the Secretary of State. The approach adopted is consistent with A30 Chiverton to Carland Cross Development Consent Order 2020 and the A63 (Castle Street Improvement, Hull) Development Consent Order 2020 – precedents which are more relevant than the site-specific, non-highways project referenced by the Council. Following discussions with the Council, the provision has been amended to require consultation with the Council in respect of the scheme for replacement land. If the Council does not consider the scheme for the replacement land to be adequate, it can raise concerns as part of that process. It will then be for the Secretary of State to determine whether the scheme is appropriate.		
Public rights of way, Article 14 – permanent stopping up of streets	2.1.19	The Council is of the view that the dDCO should contain a new article which specifically authorises the extinguishment of public rights of way other than streets for clarity. This should no longer be dealt with in Article 14. The Council cites the Thames Water Utilities Limited (Thames Tideway Tunnel) (TTT) Order 2014 and West Midlands Rail Freight Interchange Order 2020 as examples.	National Highways acknowledge the separate provision in the examples cited, but note that not all development consent orders include such a provision (for e.g. the A19 Downhill Lane Junction Development Consent Order 2020, the A19/A184 Testo's Junction Alteration Development Consent Order and the M42 Junction 6 Development Consent Order 2020). National Highways do not consider that a duplicated provision provides "clarity" in this case – in fact duplicate provisions could generate confusion. The current drafting approach already satisfies the requirement of legal certainty. Substituting the existing provision is not considered appropriate given the status of public rights of way is not a matter which is, strictly speaking, a compulsory acquisition issue.	Draft Development Consent Order (3.1)	Matter Agreed

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Works to listed buildings, Article 20 - protective works to land and buildings	2.1.20	The Council are asking to be consulted, and for Historic England to be consulted, prior to works being undertaken to listed buildings. We are not proposing a requirement for Council or Historic England consent, although the comments from both the Council and Historic England should be taken into account. There is no logic in keeping contractors in the dark about how best to avoid damaging those features for which buildings are listed. Whether National Highways and their contractors act on the advice from the Council and Historic England is at the discretion of National Highways.	National Highways propose to amend the provision to include the following: (9) Where the undertaker exercises the power under paragraph (1) in relation to a listed building, the undertaker must, except in an emergency— (a) serve the notice served on owners and occupiers of a building or land under (5) on the local planning authority and Historic England; and (b) have due regard to any response received from the local planning authority or Historic England within the period specified in the notice provided under paragraph (5). Thurrock Council have seen the Project position set out above and National Highways understand they accept this position, but they are yet to confirm the matter as agreed.	Draft Development Consent Order (3.1)	Matter Agreed
Processes in relation to human remains, Article 22 (14) – removal of human remains	2.1.21	The principle of this provision is accepted. However, it is important for National Highways to explain how it intends to satisfy itself that the remains were interred more than a hundred years ago and that no relative or personal representative of the deceased is likely to object.	Article 22(12) ensures that no notice is required to be published under article 22(3) where National Highways is satisfied that the remains were interred more than 100 years ago or that no relative or personal representative of the deceased is likely to object to the removal of the remains in accordance with the article. National Highways considers that it is reasonable to expect that it is unlikely that there would be any surviving relatives or personal representative of persons interred more than 100 years ago but has provided an additional safeguard	Draft Development Consent Order (3.1)	Matter Not Agreed

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		<p>The purpose of this explanation is twofold. Primarily it is to allow the Council and other consultees an opportunity to comment on the proposed process. Secondly it is to ensure that National Highways has a proposed process.</p> <p>It should be noted that article 22(14) is designed to remove the requirement to advertise the fact that human remains have been found. Not all DCO's contain this exemption and it is not unreasonable for the Council to understand how National Highways intends to work out that no relative or personal representative of the deceased is likely to object when no advertising of the remains has been undertaken.</p>	<p>for exceptional circumstances where it appears that an objection could be made. It is not considered appropriate to set out a comprehensive list of matters which would lead National Highways to conclude that someone is likely to object or not. National Highways, as a public body, would act reasonably in assessing whether an individual is likely to object.</p> <p>Matters which would be considered would include the period of time since the interment, the identity of the person whose remains have been interred (where known), and ability to identify any relatives. National Highways note that the provision is identical to the provision in the M42 Junction 6 Development Consent Order 2020 and the A303 (Amesbury to Berwick Down) Development Consent Order 2020, and is based on the Channel Tunnel Rail Link Act 1992, and the Crossrail Act 2008.</p> <p>For the avoidance of doubt, Requirement 9 will apply to the finding of any archaeological remains, including any plague pits or other contaminated burial sites. Requirement 9(4) provides that "archaeological remains not previously identified which are revealed when carrying out the authorised development must be retained in situ and reported to the relevant planning authority as soon as reasonably practicable from the date they are identified." We have inserted a provision into article 22 which confirms that "(16) Nothing in this article affects the application of paragraph 9 of Schedule 2 to this Order."</p>		

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Removal and restoration of compound s, Article 35(6)	2.1.22	<p>We note the powers in Article 35(6). The Council is concerned about when the removal of the compounds will occur. It is noted that the same provisions are in the A14 Cambridge to Huntington Improvement Scheme Development Consent Order 2016 and yet a number of compounds remain unrestored over 2 years after works were completed.</p> <p>The Council is of the view that a requirement for a site restoration scheme to be agreed with the relevant planning authority is needed in connection with the site compounds, with the aim to return the site to the condition it was in prior to construction, unless otherwise agreed with the local planning authority.</p>	<p>National Highways do not consider this provision necessary in light of article 35(6) of the dDCO which requires restoration, and the controls contained in the outline Landscape and Ecology Management Plan (secured under Requirement 5). Indeed, provision of an additional scheme may conflict or duplicate the measures secured in the Landscape and Ecology Management Plan.</p> <p>National Highways highlight that article 35(5) states that "The undertaker may not, without the agreement of the owners of the land, remain in possession of any land... after the end of the period of one year beginning with the date of completion of the part of the authorised development". The dDCO, therefore, ensures that land is returned to owners 1 year after the completion of the relevant works. National Highways other DCOs provide a period of 2 years, rather than 1 as per the proposed dDCO in the context of the Council's claim that the dDCO seeks the "widest" possible powers.</p>	Draft Development Consent Order (3.1)	Matter Not Agreed
Ability to review the Environmental Management Plan	2.1.23	Despite the mitigation measures in the Register of Environmental Actions and Commitments (REAC) being based on a reasonable worst case scenario, it is the	National Highways does not consider the Council's proposed approach to be necessary or proportionate in light of the fact that the environmental and traffic assessments are based on a reasonable worst-case scenario. The construction methodology is controlled via the various control documents provided (e.g., the traffic	Draft Development Consent Order (3.1)	Matter Not Agreed

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(Second Iteration), "Schedule 2, paragraph 4		<p>Council's opinion that in exceptional circumstances it can be updated. For example, if it was identified that significant environmental harm was being caused, the plan should be capable of adaptation to stop the harm being caused.</p> <p>Whilst it is noted that the Secretary of State has previously authorised projects without this requirement, the last 3 years has seen exceptional domestic and international changes and challenges. There is a real risk that the current inflexible drafting for mean that the project is already unfit for purpose and/or represents poor value for money prior to being concluded.</p>	<p>management plan for construction must be substantially in accordance with the outline traffic management plan for construction). Moreover, the outline management plans will provide mechanisms for ongoing engagement and coordination which is considered sufficient to deal with the "exceptional" circumstances referred to by the Council.</p>		
Land plans, Schedules 3, 4, 5, 8 and 11	2.1.24	<p>We have undertaken a full review, however, until such time as more detailed design work is undertaken National Highways is not able to provide any significantly greater granularity on many matters. The Council looks forward to</p>	<p>Land issues will continue to be discussed with the Council, and there will also be an opportunity to comment on the Statement of Reasons as part of the examination process.</p>	Draft Development Consent Order (3.1)	Matter Under Discussion

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		receiving more detailed design work so that it can comment further. We note that the Council has suggested to National Highways that there are plots which could be sub divided to reflect National Highway's requirements. This is the subject of ongoing discussion.			
Consultation with the Council on the EMPs (Third Iteration), Schedule 2, requirement 4	2.1.25	The Council consider that they should be consulted on the third iteration of the EMP. National Highways states that it is not appropriate for the Council to comment on operational aspects of the strategic road network. The Council considers that it needs to be consulted, due to the potential significant impact upon the local road network. For example, the project proposes to disconnect the existing strategic road network (SRN) port link between the A13 west-bound and the A1089 south-bound and instead divert this traffic via local authority roads. Considering the limited	The Third iteration EMP (end of construction phase) is a handover management plan relating to the operation and maintenance of the authorised development. This EMP does not deal with any consequent impacts on the local road network. Those matters are dealt with via Article 10 (which relates to local road network streets handed back to the Council and the Wider Network Impacts Management and Monitoring Plan (Requirement 14 which sets out how long-term traffic impacts are to be considered). National Highways is the sole strategic highway authority for the strategic road network and has statutory powers in connection with the strategic road network which are not subject to the local authority consultation requirements. For those reasons, we do not propose to change the requirements in relation to Requirement 4.	Draft Development Consent Order (3.1)	Matter Not Agreed

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		engagement by National Highways with the Council on the impact on the local road network, the Council has real concerns that National Highways is making decisions regarding the operation of the strategic road network without considering the impact on the local road network.			
Contaminated land - Schedule 2, requirements 4 and 6	2.1.26	<p>Regarding Requirement 6, Thurrock Council are concerned that historic contamination (including groundwater) is picked up too late. Requirement 6 only applies when carrying out the authorised development and the REAC does not currently capture historic contamination, especially if not captured within the ES.</p> <p>Requirement 4 must reflect the mitigation measures in the REAC and include plans for management of contaminated land. To compensate, we suggest a new Requirement: Ground conditions and ground stability 10.— (1) No part of the</p>	<p>Following feedback (including from the Council) and further development work, further specificity can be provided on the risk classification of contaminated land sites. National Highways can also confirm that assessments are undertaken in line with the Land Contamination: Risk Management guidance. The assessments which will be provided in the Environmental Statement, submitted as part of the DCO application, take into account the full dataset available on completion of the Phase 2 ground investigation. This was not available as part of the withdrawn DCO application, but has now been factored into the assessments</p> <p>In relation to the proposed Requirement, National Highways considered that the site investigations carried out are appropriate for this stage of development. Historic contamination, and appropriate investigations, have been identified as part of the environmental assessments. The application contains an Outline Remediation Strategy which sets out remediation options to address known land quality and contamination concerns and demonstrates that suitable remediation</p>	Draft Development Consent Order (3.1)	Matter Not Agreed

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		<p>Works may commence until an investigation and assessment report to identify ground conditions and ground stability has been submitted to and approved by the relevant planning authority. (2) The report submitted pursuant to sub- paragraph (1) must identify the extent of any contamination and the remedial measures to be taken to render the land fit for its intended purpose, together with a management plan which sets out long-term measures with respect to any contaminants remaining on the site. (3) In the event that the report submitted pursuant to sub-paragraph (1) identifies necessary remedial measures, no part of the Works may commence until a remediation verification plan for that part has been submitted to and approved by the relevant planning authority. (4) The authorised development must be carried out in accordance with the approved report referred to at sub-paragraph</p>	<p>techniques are available to treat the potential contamination present, if required. This outline strategy is in turn informed by a Preliminary Risk Assessment Report, which is presented as an appendix to the environmental statement.</p> <p>Requirement 6 sets out the process the Project would follow if contaminated land is encountered. Requirement 4 requires that an Environment Management Plan (Second Iteration) (EMP2) is submitted and approved by the Secretary of State. That plan must reflect the mitigation measures in the REAC and must include plans for the management of contaminated land (see Requirement 4(3)(h)). The mitigation measures included in the REAC which made the suggested Requirement unnecessary. National Highways refers specifically to GS027 in the REAC which requires "The Contractor would develop proposals for site-specific remediation in consultation with the relevant local authority prior to implementation." That measure means that a specific requirement which requires a "investigation and assessment report" is not necessary.</p>		

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		<p>(1) and, where necessary, the approved plan referred to at sub- paragraph (3).</p> <p>The Council considers that this proposed Requirement is necessary due to the following concerns:</p> <ul style="list-style-type: none"> • There remains uncertainty over site conditions, as the site investigations undertaken to date are limited in scope • The Outline Remediation Strategy identifies potential techniques, but does not set out which would be used • The current requirement GS002 is limited to pre-condition surveys on compound areas, and does not provide for more extensive site investigation 			
Landscaping plan, Schedule	2.1.27	The Council is concerned that there are no timeframes for the submission, approval or	National Highways have amended the provision so that it requires the submission and approval of a landscape and ecology management plan prior to the opening of that	Draft Development	Matter Agreed

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2, requirement 5		implementation of the Landscape and Ecological Management Plan (LEMP) or more detailed landscaping plans/details. The Council has suggested that this be prior to the commencement of any part of the authorised development. National Highways disagrees and will be sending an update on this matter.	part of the authorised development Matters dealt with under the LEMP include operational aspect and long-term maintenance. It would not therefore be appropriate require a landscaping scheme (now replaced with a landscape and ecological management plan) to be finalised prior to construction commencing. Following the amendments made by National Highways, it is understood that the Council has indicated that it is not content with the provision in Schedule 2, requirement 5.	Consent Order (3.1)	
Traffic Monitoring to include and air quality monitoring , Schedule 2, requirement 13	2.1.28	The Council remains of the opinion that it should be clearly set out in the dDCO or related control document that air quality and noise monitoring should take place to confirm that underlying assumptions are correct. If they are not then appropriate action needs to be taken. This is in the interests of both the wider environmental and local residents. The Council suggests that the dDCO should either set out that the monitoring must not impact upon the flow traffic unless National Highways has the consent of the Council.	The purpose of Requirement 13 is to monitor levels of traffic; it is not intended to deal with noise and air quality monitoring. National Highways' position is that monitoring of these aspects is not required. National Highways does not consider the Council's proposal for ongoing monitoring of air quality and traffic to be necessary given the environmental and traffic assessments are based on a reasonable worst case scenario. That scenario has formed the basis for mitigation measures secured under the REAC.	Draft Development Consent Order (3.1)	Matter Not Agreed

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Updating of control documents including the CoCP, oTMPfC, FCTP and oMHP, Schedule 2	2.1.29	<p>The Council is of the view that there should be a mechanism to review the Transport Assessment if the Project does not start within a reasonable period of the examination. The Council's position is that just because documents are based on a 'reasonable worst-case scenario' does not mean that they cannot become unrepresentative. This is especially true given the affects of the pandemic and the drive to reach Net Zero. The Council does not accept that under no circumstances should the documents be capable of review, although it is anticipated that only in exceptional circumstances will they be reviewed.</p> <p>We note that the outline management plans will provide mechanisms for ongoing engagement and coordination, however, the Council does not consider this sufficient because the Council is only consulted, it does not provide the Council with either</p>	<p>The DCO application will include a transport assessment, which is compliant with WebTAG, and which is based on a reasonable worst case scenario. The same applies to the preparation of the environmental statement and thus it is the view of National Highways that the Council's proposed review mechanism is not appropriate.</p> <p>Additionally, the outline management plans will provide mechanisms for ongoing engagement and coordination which is considered sufficient to deal with the "exceptional" circumstances referred to by the Council. The outline management plans, such as the Outline Traffic Management Plan for Construction, secure appropriate forums for engagement with the Council during the construction period.</p>	<p>Draft Development Consent Order (3.1)</p> <p>Outline Traffic Management Plan for Construction (7.14)</p>	Matter Not Agreed

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		approval rights or for National Highways to take into account our comments.			
Side agreement /DLOA - Schedule 14	2.1.30	We look forward to seeing the proposed DLOA/side agreement.	The DLOA will be developed during the contractor mobilisation phase, however the Outline Traffic Management Plan for Construction sets out a framework.	Outline Traffic Management Plan for Construction (7.14)	Matter Under Discussion
Protective provisions for drainage authorities , Schedule 14, Part 3	2.1.31	The Council maintains that enforcement related activities should remain at the discretion of the drainage authority and carried out in accordance to their Enforcement Policy and Protocol, with wording to this effect included in the schedule. The Council is of the view that the maintenance period should run from operation of the Project for a period of 12 months, rather than from commencement of construction of the specified work until the date falling 12 months from the date of completion of the specified work, given the LTC development will be under construction for a period greater than 12 months and	<p>National Highways will continue to discuss the Enforcement Policies that the Council would like incorporated in the protective provisions, but do not accept that each drainage authority's Enforcement Policy and Protocol should apply in place of the provisions in Schedule 14, Part 3 to the dDCO. The Council will have an enforcement role under Part 8 of the 2008 Act.</p> <p>The date of completion referred to in paragraph 23(1) is when the specified work has been constructed, rather than the Project. For a specified work to be completed, National Highways would have provided a notice in writing and constructed the work to the reasonable satisfaction of the drainage authority. It would not be appropriate for National Highways to continue to maintain these works once they are complete and should be under the control of the drainage authority, because other unrelated elements of the Project may continue to be under construction.</p> <p>Incorporating the suggested wording would lead to impractical outcomes as it is not possible to say whether an obstruction could be removed within that amount of time. The current wording "reasonably practicable" allows</p>	Draft Development Consent Order (3.1)	Matter Not Agreed

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		<p>drainage work will need to be maintained throughout.</p> <p>The Council suggests the timescale within which obstructions from drainage works should be removed should be specified, i.e. as agreed between the undertaker and drainage authority or no more than 14 days.</p>	<p>the context of the situation to dictate the amount of time needed. This does not prevent a drainage authority from informing National Highways what it deems is a "reasonable" amount of time.</p>		
Ability to review traffic assessment, Schedule 2	2.1.32	<p>The Council is concerned that traffic assessments will become out of date due to significant changes on how the transport network is utilised. To continue working on a project without amendment, despite knowing major changes to the transport network will hinder the effective operation of the project, is not in the public interest. The Council understands the need for certainty in relation to the Project and the reasons why the environmental and traffic assessments are based on a reasonable worst-case scenario. However, the last two years has seen</p>	<p>National Highways refer to the response provided under Item No. 2.1.29 of the SoCG which sets out our position on in relation to updating control documents and traffic assessments.</p>	Draft Development Consent Order (3.1)	Matter Not Agreed

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		unprecedented change in how we live and work. This is combined with significant environmental concerns and the need to reduce carbon emissions. Accordingly, there needs to be the ability to review and amend the Project in exceptional circumstances. This is because the likelihood of there being exceptional circumstances, although low, is significantly higher than it might have been two years ago.			
Construction of accesses, Article 11	2.1.33	The Council has no further comments, so long as the accesses are created to an appropriate standard, which we assume will be set out in the Code of Construction Practice. Please confirm.	National Highways confirm that the Code of Construction Practice will set out that accesses should be constructed to an appropriate standard.	Draft Development Consent Order (3.1)	Matter Agreed
DCO Requirement for ecological and landscape mitigation	2.1.34	The Council, seek the inclusion of a DCO Requirement for ecological and landscape mitigation proposals to be included in the draft DCO, and for the Council to approve the details.	Requirement 5 of the dDCO deals with landscape and ecology matters and the Council will be consulted under that provision. National Highways refer to the response provided under Item No. 2.1.3 which sets out the Project's position in relation to the Secretary of State being the appropriate discharging authority.	Draft Development Consent Order (3.1)	Matter Not Agreed

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EIA mitigation secured through the EMP2	2.1.35	The Council is of the view that the weak approach to EIA mitigation being secured through an EMP2 which merely "reflects" the REAC is of potential concern as National Highways will have less control over the implementation of 'Non-Contestable' works by utilities statutory undertakers.	This phrasing is used successfully across the National Highways' DCO portfolio and there have been no instances where the issue raised by the Council has arisen. This is an "in principle" concern which would apply to any other National Highways project with utilities works but where the word "reflect" is used (e.g. the M42 Junction 6 Development Consent Order 2020, the A19/A184 Testo's Junction Alteration Development Consent Order 2018).	Draft Development Consent Order (3.1)	Matter Not Agreed
2.3.1 to 2.3.4 (Traffic Management Plan (TMP) Consultation and Approval)	2.1.36	The document now clearly commits the contractor to the preparation of TMP/TMPs for approval. It also includes a commitment to consultation with "the relevant authorities" (which should be defined) on the TMP/TMPs prior to submission to the SoS at 2.3.3. The Council has made representations to National Highways, however, to express that the Council should be the approving authority of the document rather than a consultee. The Council has no certainty that it will be listened to, or commitments actioned, and sanctions taken if it is not the approving body. National	National Highways' position in relation to the Secretary of State being the appropriate discharging authority is set out in the response provided under Item No. 2.1.3 of the SoCG. Schedule 2 (Part 2) Requirement 10 of the dDCO requires that "evidence to the SoS must include a report detailing feedback received and how it has been addressed." There is a specific provision which requires the provision to the Secretary of State of "any representations made by that authority or statutory body about the proposed application, and a written account of how any such representations have been taken into account in the submitted application" in the dDCO. National Highways does not agree that the Council needs to comment on this report: if the Secretary of State considers that the representations are not considered adequately and the application for an approval is deficient, they will simply not grant the approval. The DCO requirement balances the need to consult and	Draft Development Consent Order (3.1)	Matter Not Agreed

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		Highways refers to reporting to the SoS that consultation with Local Authorities has been undertaken, however, the evidence to the SoS must include a report as to what feedback was received and how it has been addressed. This is fundamental if the local authority is not to be the approving body. The local authority must have the right to respond to the report and a system of conflict resolution identified.	avoid unreasonable delays in implementing the consent if granted.		
Lack of information on certain provisions	2.1.37	The Council believes there is a lack of information as to why certain provisions are required. When compared with other DCOs the draft DCO generally seeks to expand the powers of National Highways.	National Highways' draft DCO reflects powers and requirements established in other similar Highway development projects. <i>'Advice Note Fifteen: Drafting Development Consent Orders'</i> published by the Planning Inspectorate acknowledges that applicants should look at made DCOs published by the same Department as would authorise their DCO to identify that Department's drafting preferences. The guidance also acknowledges that departures from precedent are likely to be rare and required only to address novel issues which are project specific and that applicants should set this out in the Explanatory Memorandum.	Draft Development Consent Order (3.1)	Matter Not Agreed
Articles 28(5),	2.1.38	The Council seek further justification for the exclusion of	The counter notice procedures under Schedule 2A are only applicable where notice to treat has been served but	Draft Development	Matter Not Agreed

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30(5) & 31(14)		subsoil and airspace from the existing statutory counter notice provisions. No clear reason why existing statutory protections should be disapplied under this scheme. The Council seek specific and detailed evidence in relation to both the need and anticipated effect of these changes.	entry has not yet been taken. The purpose of the modification in article 28(5)(b) is to clarify that where temporary possession of land is taken under articles 20, 21, 35 or 36, such entry does not legally constitute the taking of entry and possession pursuant to the exercise of powers of acquisition (i.e. through the notice to treat and notice of entry procedures provided for by the CPA 1965). Accordingly, where land is only to be used and possessed temporarily, it is clear that the counter notice procedures under Schedule 2A does not apply. The Acquisition of Land Act 1981 explicitly permits the disapplication of Schedule 2A in relation to subsoil. The approach adopted by the Project is consistent with every tunnel based DCO project, including the TTT Order, A303 (Amesbury to Berwick Down Development Consent Order 2020 and the Silvertown Tunnel Order 2018).	Consent Order (3.1)	
Article 29(4)	2.1.39	The Council is concerned that the provisions in article 29(4) as drafted would allow National Highways to cut off essential services to land such as water or electricity and is of the view that this needs to be specific and restricted.	Article 29(4) does not authorise the suspension of utility services, it deals with private rights, and the rights belonging to utility undertakers (including those in connection with the supply of a service) are excluded by operation of article 29(5). National Highways note that the suspension of private rights under article 29(4) is subject to National Highways serving a notice specifying the right is not extinguished, or an agreement with the landowner (see article 29(7)).	Draft Development Consent Order (3.1)	Matter Not Agreed
Article 29(9)	2.1.40	Further justification for wide interpretation of private rights to be provided, including examples of practical application.	Following provision of further justification and no further comment from the Council, National Highways consider this matter agreed.	Draft Development Consent Order (3.1)	Matter Agreed

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Article 33(1)	2.1.41	National Highways to provide further justification and expected impact on compensation.	Following provision of further justification and no further comment from the Council, National Highways consider this matter agreed.	Draft Development Consent Order (3.1)	Matter Agreed
Article 39(2)	2.1.42	The Council is of the view that Article 39(2) - Provision relating to the recovery of costs of new connections should be extended to cover compensation for losses, not just expenditure.	National Highways' dDCO follows established precedent on this point, and it is not considered appropriate to deviate in light of the compensation provisions provided throughout the dDCO. The Council notes this and is now content with the position on the matter.	Draft Development Consent Order (3.1)	Matter Agreed
Discharge of Requirements	2.1.43	The Council suggest that there should be the ability to appeal to the Secretary of State, in the event that the relevant planning authority refuses consent, or granted subject to unacceptable conditions which National Highways considers to be unacceptable.	The dDCO has been amended to include an article enabling an appeal to the Secretary of State in the event that a local authority refuses an application for any approval required by articles 12(5), 17(2), 21(4) and paragraph 13(1) of Schedule 2; or grants an approval mentioned above subject to conditions; or refuses an application for a permit under a permit scheme or grants such a permit subject to conditions.	Draft Development Consent Order (3.1)	Matter Agreed
Traffic Management	2.1.44	The Council require confirmation on how traffic management in relation to the pre-commencement activities will be undertaken. The current wording the traffic management plan for construction won't be in place	The Outline Traffic Management Plan for Construction has been revised and now sets out clear requirements for preliminary works to be undertaken prior to commencement.	Outline Traffic Management Plan for Construction (7.14)	Matter Under Discussion

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		for the pre-commencement activities.			
Traffic Management Permits	2.1.45	It is the Council's position that the TMP and any works must be dealt with via the permitting process. We have considered National Highway's previous response in relation to this suggestion. However, it remains the Council's position that the most appropriate way forward is for the permitting scheme not to be modified, and for designated resource to be provided by National Highways to allow the Council to process the Project's permit applications quickly, whilst continuing to allow the efficient processing of permits from other applicants.	In light of the Council's concerns, National Highways proposes to utilise the Council's permit schemes subject to modifications which are compatible with the precedented approach and would ensure that conditions which may conflict with an Order (if granted) could not be imposed on National Highways. Although the Council has confirmed that it is not aware of any conditions that are likely to be used which would breach any Order, there is precedent in the Southampton to London pipeline scheme whereby the Secretary of State considered that the identical provision is justified.	Draft Development Consent Order (3.1)	Matter Not Agreed
Travellers Site Deemed Approval (c)	2.1.46	It remains the Council's position that deemed consenting provisions do not increase the speed of the delivery of the Project. Instead, they encourage the Council to refuse consent, and significantly increase the likelihood of negative	National Highways refer to the responses provided under Item Nos. 2.1.5 and 2.1.6 which set out our position on deemed consent provisions.	Draft Development Consent Order (3.1)	Matter Not Agreed

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		outcomes for the public as important decisions could be made without appropriate scrutiny.			
Travellers Site Indicative Layout Plan	2.1.47	Requirement 13 should cross refer to the indicative layout plan (referred to in the Design Principles (S11.12)) and for the development to be completed in accordance with it.	Requirement 13 already requires that " <i>The details submitted and approved under [this requirement] must be in accordance with...the design principles document</i> ". S11.12 of the Design Principles is part of the Design Principles and as such, no change has been made to the dDCO.	Draft Development Consent Order (3.1)	Matter Under Discussion
Requirement 3	2.1.48	This requirement must ensure that the Council approves the Outline Landscaping and Ecology Management Plan. The landscaping scheme must then be in accordance with the approved plans. Previous engagement with National Highways refers to 15% biodiversity net gain (BNG) gain. We suggest that this is set out in the Outline Landscaping and Ecology Management Plan (which will then be secured by the landscaping scheme).	As reflected in the responses to Item Nos. 2.1.3 and 2.1.49, National Highways is of the view that the Secretary of State is the most appropriate discharging authority for the Project dDCO. The Council will be consulted on the discharge of requirement 5 and under paragraph 18 of Schedule 2 to the dDCO, representations from the Council will be provided to the Secretary of State and so its views will be properly represented to, and considered by, the Secretary of State. The issue of landscaping scheme being in accordance with the approved plans and the biodiversity net gain remains under discussion.	Draft Development Consent Order (3.1)	Matter Under Discussion
Requirement 14	2.1.49	As set out above, a number of the Requirements should be approved by the Council not	It is the view of National Highways that the Secretary of State is the most appropriate discharging authority for the Project dDCO. There are a number of local authorities	Draft Development	Matter Not Agreed

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		<p>the Secretary of State. Accordingly, amendments to the approved details will need to be by the Council where the Council is the discharging authority. Any amendments should only be approved if they don't give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement.</p>	<p>across the Project and the need for consistency in decision making which warrants one discharging authority. The Project is complex, and the disparate elements of the Project being intrinsically linked justifies one discharging authority. A separation would be artificial and impractical as changes could not be made to the local highway sections without considering the impact of those changes on the trunk road and vice versa. The Requirements reflect the arrangements made in June 2016 whereby the Department for Transport agreed to be the competent authority signing off compliance with the requirements for DCOs promoted by National Highways. As a result of this arrangement, there is a specific team within the Department for Transport to deal with the discharge of requirements.</p> <p>The Council will be consulted on the discharge of requirements 3, 4, 5, 6, 8 and 10 (in addition to any variation to the limits of deviation under article 6). Under paragraph 20 of Schedule 2 to the dDCO, representations from the Council will be provided to the Secretary of State and so its views will be properly represented to, and considered by, the Secretary of State.</p> <p>The Secretary of State has confirmed that it is the appropriate discharge authority for National Highways schemes and went as far as to take the decision to remove a local authority's proposed discharge function in relation to a local road (see the A303 Sparkford to Ilchester Dualling Development Consent (Correction) Order 2021).</p>	Consent Order (3.1)	

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			<p>National Highways has not experienced significant issues in the engagement and coordination with local authorities in the implementation of the discharge requirements for other National Highways DCO projects.</p> <p>Where appropriate, the dDCO provides for a proportionate local authority approval function (e.g. under article 17, consent of a local traffic authority must be obtained for any traffic regulation measures under that article).</p> <p>Paragraph 17 of Schedule 2 to the dDCO provides that the local planning authority will approve any amendments to approved details to the travellers' site in Thurrock (see paragraph 13), for which the Council is the discharging authority and amendments to the detailed design must be agreed in writing by the Secretary of State, following consultation with the relevant planning authority, providing that the Secretary of State is satisfied that any amendments would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement (see paragraph 3 of Schedule 2 to the dDCO).</p> <p>In relation to the request regarding amendments, National Highways considers the environmental and traffic assessments are based on a reasonable worst-case scenario. The construction methodology is controlled via the various control documents provided (e.g., the traffic management plan for construction must be substantially in accordance with the outline traffic management plan for construction). We note that even though this comment would apply to any National Highways DCO project (including complex infrastructure</p>		

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			of a similar size and scale to the Project), the Secretary of State has not considered such a requirement to be appropriate or necessary."		
Schedule 12	2.1.50	<p>The Council has concerns regarding the drafting of Schedule 12. It is of the view that the dDCO should contain its own provisions, rather than cross-referring to the 2013 Order, even if it mirrors those provisions, to allow for flexibility in the event of amendments to either provisions.</p> <p>The Explanatory Memorandum needs to further explain the rationale for aligning the charges, discounts and exemptions to those at the Dartford Crossing.</p> <p>The Council is concerned that Schedule 12 goes further than referring to legislation that may be amended from time to time as it also refers to orders which replace the 2013 Order. The Council is of the view that references to future, as yet undrafted legislation should be removed.</p>	<p>The provisions have been drafted in order to align the Lower Thames Crossing with the Dartford Crossing charging scheme, consistent with the proposals for the Project. There are appropriate mechanisms permitted under the Planning Act 2008 and Transport Act 2000 should a need to create different charging schemes for the two crossings arise.</p> <p>Section 5.204 of the Explanatory Memorandum explains that Schedule 12 has been drafted to align the charges, discounts and exemptions to those existing at the Dartford Crossing. A Road User Charging Statement explaining this in further detail will accompany the DCO application.</p> <p>References to the orders or regulations which may be amended or substituted are in order to ensure that updates to the Road User Charging Schemes (Penalty Charges, Adjudication and Enforcement) (England) Regulations 2013 (Enforcement Regulations) or the 2013 Order (e.g. the insertion of a new article or regulation) do not affect the operation of Schedule 12. It is not considered appropriate to fetter the Secretary of State's power to provide for an enforcement regime for road user charging schemes which operate outside of the DCO.</p>	Draft Development Consent Order (3.1)	Matter Not Agreed

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Certified Documents	2.1.51	The Council is concerned that the development is undertaken in accordance with the certified documents. Although some of the certified documents are referred to in conditions, such as the 'general arrangement drawings' others (for example the 'structures plans') are not. There needs to be a general requirement that works are undertaken in accordance with the certified documents.	National Highways considers that certified documents are already appropriately secured. Relevant certified documents are referred to in the requirements. It would not be appropriate to have a "general requirement" that works are carried out in accordance with all certified documents because not all certified documents are relevant.	Draft Development Consent Order (3.1)	Matter Not Agreed
Article 19 – Compensation for discharge of water	2.1.52	The concern relates to water from the operation of the Project, which is discharged into a watercourse and has an adverse effect on flooding. Compensation needs to cover injurious effects to third parties. For example, with discharges into watercourses, which adversely impacts flooding some distance from the Project. It is our understanding that this situation compensation would not be payable on the dDCO as currently drafted, hence the	National Highways do not consider there is any scenario whereby the exercise of this power would lead to a requirement to provide compensation which is not already provided for by other provisions of the dDCO. In particular, the dDCO makes provision for compensation in connection with temporary and maintenance works (articles 35, 36), use of land (under articles 20, 21), the construction of permanent works (article 25) and acquisition of land/rights (article 28).	Draft Development Consent Order (3.1)	Matter Under Discussion

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		need for specific compensation provisions.			
Article 57 – defence to proceedings in respect of statutory nuisance	2.1.53	Overly broad defences to proceedings in respect of statutory nuisance, Article 57 – National Highways has proposed a very broad range of statutory defences to nuisance. Clearly it is in the public interest for all steps to reduce nuisance to be taken. It is a concern that National Highways wants such a wide set of statutory defences, especially as they are not contained in any other Highways DCOs. The majority of highways DCOs refer to paragraph 19(1)(g) of the Environmental Protection Act 'noise emitted from premises so as to be prejudicial to health or a nuisance'. It is clearly in the public interest to minimise nuisance claims. National Highways needs to justify why these defence provisions are required. Having such a broad range of defences may discourage National Highways	<p>National Highways have provided a detailed justification which does not appear to have been responded to or considered by Thurrock Council.</p> <p>National Highways have acknowledged precedent DCOs vary in which paragraphs of section 79(1) the Environmental Protection Act 1990 are referenced in this article. In light of this lack of consistency, National Highways have considered the fundamental purpose of the provision and have determined that the most appropriate way of proceeding is not to following the most expansive, or narrow, list of paragraphs of section 79(1) referenced. Instead, it is proposed to limit the paragraphs referenced to those nuisances which are considered to be potentially engaged for the Project. Accordingly, paragraphs (d), (e), (fb), (g), (ga) are currently referenced in this article. If, as a result of updates to the Statement of Statutory Nuisances (which will flow from updates to the Environmental Statement), the provisions which are potentially engaged change, the provision will be amended accordingly.</p>	Draft Development Consent Order (3.1)	Matter Under Discussion

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		from reducing nuisance created.			
Article 35(3)	2.1.54	<p>Notice period for temporary possession, Articles 35(3) and 36(3) - Article 35(3) and Article 36(3) requires National Highways to provide at least 28 days notice before entering and taking temporary possession of land. In our opinion both these time frames are far too short, especially if landowners need to make alternative arrangements for their business to continue to function. Accordingly, the period in articles 35(3) and 36(3) should be 3 months.</p> <p>We note that this has already been raised, however, it is an area that we feel we should be able to reach an agreement. It is unclear why National Highways' is not able to give 3-months notice before potentially causing significant disruption to local residents by taking temporary possession of their land. As a public body it is important to be fair to local landowners in order to</p>	<p>National Highways do not consider a 3 month notice period is appropriate or proportionate for the Project. The 28 days period must be seen in the context that landowners and occupiers have been consulted on land use over numerous consultations; will have an opportunity to take part in the examination process; and National Highways will be required to publish a notice under section 134 of the Planning Act 2008. We do not think a 3-month period is consistent with the government's desire to ensure nationally significant infrastructure projects are expeditiously delivered. In this context, National Highways do not agree that the notice is likely to "increase losses and so compensation payable from the public purse" (a statement for which no evidence is provided). Leaving aside this Project-specific justification, National Highways note that complex projects such as the A14 Cambridge to Huntingdon project have provided 14 days (which the Project dDCO is doubling). National Highways has not experienced any difficulty in the implementation of the notice provisions in relation to its other DCOs. It is not considered appropriate to include more restrictive and onerous provisions than other DCOs approved by the Secretary of State for the Project.</p>	Draft Development Consent Order (3.1)	Matter Not Agreed

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		<p>minimise the negative impacts on Council residents.</p> <p>The Council therefore considers that the December Response asks the wrong question. It is not for the Council to evidence why a 3-month period is justified, but instead for National Highways to justify why it cannot in this case provide a longer period – if that is the case.</p> <p>It is of course important to landowners that they have a realistic timescale of how long their land will be taken for. This also allows them to better mitigate any losses. We therefore suggest that the Explanatory Memorandum makes a commitment to: (a) outlining estimated timescales as accurately as possible to landowners when notices are given; and (b) keeping them updated as to evolving timescales. The Council fully anticipates that National Highways will be doing this in practice as a responsible public body – but consider that</p>			

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		there is value to this being specifically set out.			
Article 21(3)	2.1.55	<p>Authority to survey and investigate the land, Article 21(3) – insertion of 'reasonably necessary' – This provision allows persons to enter third party land on behalf of National Highways to carry out surveys, investigation or make trail holes or boreholes. NHE is unwilling to as it states that National Highways 'should not be in a worse position under the DCO regime (which intends to streamline consents) as compared with its ordinary functions'. The Council has two concerns with this. First, it is not understood how National Highways would be placed in a worse position - unless of course the intention is to take onto the land such vehicles and equipment as are not reasonably necessary to carry out the survey, investigation, or make trail or boreholes. Second, we are not aware of any provisions which mean that National Highways cannot</p>	<p>The provision in question (article 21(3)) can only be utilised where the primary powers (in article 21(1)) are engaged. Those powers are limited and can only be utilised for the purposes of the construction, operation or maintenance of the authorised development. The power, as drafted, is based on section 289 of the Highways Act 1980, and National Highways should not be in a worse position under the DCO regime (which intends to streamline consents) as compared with its ordinary functions. National Highways is a public body and will exercise powers in a reasonable manner, subject to the enforcement provisions of the Planning Act 2008. The approach adopted here is consistent with the Secretary of State's practice, and there is no basis for the Project departing from the approach taken.</p>	Draft Development Consent Order (3.1)	Matter Not Agreed

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		<p>be placed in a less favourable position than the underlying legislation. Each DCO is to be taken as a whole – it is not limited to streamlining the existing consenting regime. Some powers given to National Highways will be greater than the underlying regime, whereas others will be less generous. What is important is that there are sufficient checks and balances in place to allow development to proceed efficiently whilst protecting the public.</p>			
Article 18	2.1.56	<p>Powers in relation to relevant navigations or watercourses, Article 18 - This article provides for relatively unusual powers in relation to interference with navigation in watercourses, regardless of any interference with private rights. Whilst Article 18(3) provides for compensation this only applies in relation to Article 1(b). In the Council's opinion compensation should be payable to all those that have suffered loss due to the</p>	<p>In relation to article 18(3), National Highways do not consider it necessary to amend the compensation provision (indeed, some DCOs do not contain compensation provision in equivalent articles, see article 20 of the M25 Junction 28 Development Consent Order 2022). The reason for this is that the provision of compensation is already provided in other articles of the dDCO. Nonetheless, National Highways have amended the provision in line with the request by the Council in order to try to resolve mere drafting issues though would flag the Secretary of State may simply revert to the precedented approach which he has endorsed on numerous occasions (and for which the Project has no reasons from departing). In relation to the final paragraph, National Highways highlights the provision</p>	Draft Development Consent Order (3.1)	Matter Under Discussion

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		<p>exercise of the powers in Article 18(1) (not just article 18(1)(b)).</p> <p>In addition, the reference to compensation under the 1961 Act is not appropriate, as the statutory regime does not apply to temporary rights, and so applying the 1961 Act does not provide sufficient compensation. In particular, specific reference needs to be made to severance and injurious affection and incorporate the compensation code, despite there not being permanent land take.</p> <p>We welcome National Highways' comments that the compensation should apply to 'any loss', however, the current wording does not achieve that level of protection in relation to the powers in Article 18.</p>	<p>requires compensation for 'any loss' and does not consider any further amendment is required.</p> <p>In relation to the comment that the reference to the 1961 Act is not appropriate in relation to the temporary powers, this is not correct as a matter of law. National Highways refer to BPP (Farringdon Road) Ltd v Crossrail Ltd [2015] UKUT which specifically refutes that argument.</p>		
Need for the Project					
Lack of secured local benefits and	2.1.57	Thurrock Council is opposed to the Project, as it provides few local benefits to the Borough, but more importantly has	The need for the project is set out in the Need for the Project document. The economic benefits for Thurrock accounting for the disbenefits, are set out in the, CoMMA Appendix D.	Need for the Project (7.1) Benefits and Outcomes	Matter Under Discussion

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significant disbenefits which are not adequately mitigated		<p>significant disbenefits which are not adequately mitigated.</p> <p>There is a lack of legally secured (in DCO or suitable agreements), real benefits for Thurrock from the Project, in terms of provision of open space, increased local road and Public Rights of Way (PRoW) connectivity, active travel, investment, and local regeneration. National Highways needs to secure DCO benefits to ensure a lasting beneficial legacy – covering community infrastructure, environment, health and wellbeing and opportunities for local employment, apprenticeships, and training programmes.</p>	<p>The Projects DCO application is accompanied by a series of documents providing detail of the legacy and benefits of the scheme for each local authority area (including Thurrock Council) together with estimates of the monetary uplift expected as a result of the Project. The Benefits and Outcomes document summarises the Project's benefits that are both inherent to the Project and secured through DCO and signposts out to documents where these are set out more fully. Four categories are presented.</p> <ul style="list-style-type: none"> • Transport benefits of the Project DfT guidance defines monetised benefits when calculating the Benefit Cost Ratios (BCR) known as Level 1 and 2 impacts and also when assessing a project's Value for Money known as Level 3 impacts. These are as set out in the Combined Modelling and Appraisal Report (CoMMA) and its Appendix D (Economic Appraisal Report, Distributional Impact Analysis, Appraisal Summary Table and Wider Economics Impact Report) As outlined in the CoMMA, Thurrock would receive the most monetised benefits of the Project. • Other benefits of the project including a range of other planning policy, environmental and sustainability benefits are set out in the Need for the Project, Planning Statement and Sustainability Statement. • Mitigation and enhancements are secured through a range of control documents notably the Code of Construction Practice (CoCP), including the Register of Environmental Actions and 	<p>Document (7.20)</p> <p>Combined Modelling and Appraisal Report (7.7)</p> <p>ComMA - Appendix D - Economic Appraisal Package (7.7)</p> <p>ComMA - Appendix D - Distributional Impact Appraisal Report (7.7)</p> <p>ComMA - Appendix D - Appraisal Summary Table (7.7)</p> <p>ComMA - Appendix D - Level 3 Wider Economic Impacts Report (7.7)</p> <p>Need for the Project (7.1)</p>	

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			<p>Commitments (REAC) and the Section 106 Agreement. The S106 agreements sets out obligations that will deliver benefits to the local community including targets for skills, education and employment and a Community Fund to support mental health and wellbeing, local skills and employment, connecting communities and the environment.</p> <ul style="list-style-type: none"> Wider benefits via designated funds – National Highways operates several dedicated funds (known as designated funds) to provide environmental, social and economic benefits to the people and businesses who live and work near to the SRN. The money is allocated to four funding streams focused on making improvements that will make the biggest difference and deliver lasting benefits. The four designated funds cover safety and congestion, environment and well-being, users and communities and innovation and modernisation. <p>In addition, public recreation spaces are being created as part of the project such as Tilbury Fields. Public access to Tilbury Fields will be permitted offering recreational space and views across the Thames Estuary. The local public Walking Cycling and Horse riding (WCH) network will be enhanced with greater network opportunities providing a greater variety of routes for active travel (Hatch measures L12 and L14). These are secured by the design within the DCO application via the Design Principles.</p>	<p>Planning Statement and the National Policy Statement (NPS) Accordance Table (7.2)</p> <p>Sustainability Statement (7.11)</p> <p>Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)</p> <p>Section 106 Agreement (7.3)</p> <p>Design Principles (7.5)</p>	

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Planning statement/policy					
Accordanc e with National and Strategic Policy	2.1.58	<p>The Council is concerned by the lack of the Projects performance against national and National Highways strategic policies and its 7 scheme objectives (which have not been prioritised or weighted)</p> <p>Additionally, the national and strategic policies and scheme objectives that the Project does not satisfy relate to the following documents:</p> <ol style="list-style-type: none"> 1. NPSNN (2015) – paragraph 2.13, 2.22, 4.3, 4.27 2. DFTs Road Investment Strategy 1 and 2 (RIS 1 and 2) - selected paragraphs 3. National Highway's 'The Road to Growth – Our Strategic Economic Growth Plan' (2017) - selected paragraphs 4. National Highway's Strategic Business Plan (2017) - selected paragraphs 	<p>National Highways has set out how the project meets national policies and scheme objectives, both in consultation and through provision of documents and discussion with the Council.</p> <p>The DCO application documents clearly address this issue. The Planning Statement maps the project objectives to the National Policy Statement for National Networks (NPSNN) evidence and demonstrates the alignment between the policy and the project as a high level.</p> <p>The application also provides evidence to illustrate the performance of the project against the policy requirements of the National Networks and Energy National Policy Statements (NPS), as they apply to the Project. The Planning Statement also provides evidence to demonstrate the optioneering process, how engagement and consultation has influenced the proposed scheme, and the link between the delivery of sustainable development.</p> <p>Further discussions will be carried out with the Council post application once the Planning Statement has been published.</p>	<p>Need for the Project (Application Document (7.1)</p> <p>Planning Statement and the National Policy Statement (NPS) Accordance Tables (7.2)</p> <p>Planning Statement Appendix A - National Policy Statement for National Networks (NPSNN) Accordance Table (7.2)</p>	Matter Under Discussion

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Green Belt Methodology	2.1.59	<p>The Project is 'inappropriate development' and harmful to the Green Belt. Furthermore, the Council question if the compliance with NPS policy in relation to the Green Belt is adequately demonstrated and all other reasonable options have been examined.</p> <p>The Council has not yet had the opportunity to comment on a full LTC Green Belt assessment, despite 2 years having elapsed since DCOv1 was withdrawn. A Green Belt Assessment (GBA) should have been undertaken of all alternative routes, to help inform the preferred route of the scheme and National Highways should have consulted LPAs on the GBA methodology prior to the assessment and consultation on the GBA should have been undertaken prior to submission of the DCO application. The assessment is not considered to be in accordance with the NPPF and local planning policy including the Thurrock</p>	<p>The Project Planning Statement robustly addresses Green Belt policy. It contains information on emerging local plan policies and allocations, where these are at an advanced stage and therefore carry weight. There is also a Chapter in the Planning Statement that assesses the relationship between the Project and other major planned and consented developments.</p> <p>Further discussions will be carried out with the Council once the Planning Statement has been published. The Local Impact Report will be an opportunity for Thurrock Council to respond to the approach taken by the Project on Green Belt issues.</p> <p>The Route options assessment was undertaken giving due regard to the presence of the Metropolitan Green Belt alongside many other constraints. The project objectives require the Project to address the fundamental issues at Dartford.</p> <p>The assessment of the routes to the east and to the west of the Green Belt did not for a variety of reasons meet the project objectives and demonstrated greater economic, social and environmental impacts. Therefore on balance, despite the location of the project within Green Belt the current route was selected.</p>	<p>Need for the Project (Application Document 7.1)</p> <p>Planning Statement and the National Policy Statement (NPS) Accordance Tables (7.2)</p> <p>Planning Statement Appendix A- National Policy Statement for National Networks (NPSNN) Accordance Table (7.2)</p> <p>Planning Statement Appendix C Local Authority Policy Review (7.2)</p> <p>Planning Statement Appendix E –</p>	Matter Under Discussion

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		<p>Strategic Green Belt Assessment.</p> <p>The Council has assumed that the assessment of harm to the Green Belt has not informed the alternatives process or the selection of the preferred route for the Project.</p>		Green Belt (7.2)	
Green Belt Assessment	2.1.60	<p>The Council does not agree with identifying parts of the Project development as 'appropriate' or 'inappropriate' development in relation to assessing the impact to the Green Belt. The Green Belt assessment does not sufficiently assess the impact of the Project as a whole.</p> <p>Thurrock Council consider that the Project is without a correct assessment of the Green Belt which raises questions to whether the right option was selected to comply with Green Belt policy, preferred route and design, and whether the right mitigation has been selected to minimise the impact on the Green Belt.</p>	<p>The Project Road is located within the Green Belt and is considered to be inappropriate development as a whole. Linear nationally significant infrastructure projects often pass through designated Green Belt as recognised within the NPS, though there are very special circumstances which justify those impacts.</p> <p>National Highways considers that the approach to the Green Belt assessment is robust and is presented in the Planning Statement.</p> <p>Further discussions will be carried out with the Council post application once the Planning Statement has been published. National Highways view is there is a clear and convincing basis to grant development consent for the Project.</p>	<p>Need for the Project (7.1)</p> <p>Planning Statement and the National Policy Statement (NPS) Accordance Tables (7.2)</p> <p>Planning Statement Appendix A - National Policy Statement for National Networks (NPSNN) Accordance Table (7.2)</p> <p>Planning Statement</p>	Matter Under Discussion

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				Appendix C Local Authority Policy Review (7.2) Planning Statement Appendix E – Green Belt (7.2)	
Planning Balance	2.1.61	<p>Thurrock Council have provided evidence of what they consider to be the adverse effects of the Project, yet these adverse effects and missing data and information remain outstanding. This includes key data on traffic modelling, AQ and noise assessments and health impacts and mitigation.</p> <p>Therefore, the Planning Statement included as part of the previously submitted application is considered to be incorrect to conclude that the planning balance weighs towards a positive outcome. As stated in NPSNN 4.4 the potential benefits and potential adverse impacts should be considered at a national, regional and local level.</p>	<p>National Highways will continue to discuss the contents of the Planning Statement including the planning balance post submission and during examination as required.</p> <p>The Planning Statement is based on the information and data available at the time of drafting. Therefore, the Planning Statement was not 'incorrect' it reflected the information available. However, as the project has continued to evolve the Planning Statement has been updated and reflects the impacts and benefits of the project, assessed against National Policy and articulates a balanced judgement in the DCO submission.</p>	<p>Planning Statement and the National Policy Statement (NPS) Accordance Tables (7.2)</p> <p>Planning Statement Appendix A- National Policy Statement for National Networks (NPSNN) Accordance Table (7.2)</p> <p>Planning Statement Appendix C Local Authority</p>	Matter Not Agreed

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				Policy Review (7.2)	
Cumulative Effects and effect on Local Plan	2.1.62	<p>The Council has concerns of cumulative impacts from other large-scale developments in the local area, which would result in increased impacts of additional traffic movements on the Local Road Network (LRN), as well as on Junction 30 of the M25. National Highways has holding objections to two major planning applications at Purfleet and north of lakeside but has so far failed to identify what mitigation or interventions are required at Junction 30, in order to allow the proposed development of these sites proceed. Until an agreed solution to the Junction 30 and the Project local connectivity issues, it will remain difficult for the Council to progress the new Local Plan.</p> <p>The Council acknowledges that National Highways is preparing modelling of the implications of local strategic growth (i.e. indicative Local Plan tests) on the operation of the LTC and the consequential effects on the local road</p>	<p>Works on junction 30 of the M25 are not being proposed as part of the Project. National Highways continues to engage with Thurrock Council on the local plan in accordance with the license obligations to work with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users. National Highways consider that these matters, being managed as the authority for the strategic road network, are not related to the Projects' application.</p> <p>The forecast traffic flows indicate that in the opening year there would be a reduction in the traffic flow on key roads on the strategic road network in Thurrock, including at junction 30 and on the A13 west of the junction with the proposed Project. The traffic forecasts of the Project are documented in the Combined Modelling and Appraisal Report (ComMA) and its Appendix C (The Transport Forecasting Package).</p>	<p>Combined Modelling and Appraisal Report (ComMA) (7.7)</p> <p>ComMA – Appendix C - Transport Forecasting Package (7.7)</p>	Matter Not Agreed

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		network, to be shared directly with the Council. The Council is unable to wholly comment on those effects until that testing has been received (it has now been over 1 year awaiting these results) and, therefore, currently remains concerned that the proposals do not recognise the importance of local sustainable growth and connectivity. It is the Council's opinion that the current configuration of the route does not allow effective connectivity for new local bus services connecting Kent and Essex and does not respond to measures for strategic cycle connections.			
Lack of Public Transport Provision in Design	2.1.63	The Council believe the Project's design does not facilitate viable public transport services along the route, does not provide necessary connections in the Borough and does not provide adequate provision on key LTC crossings. 1. National Highways states "there are currently no	National Highways is not a public transport operator however, the Project would be available by use for public transport services, and the Project does provide additional connectivity across the Thames, as well as providing shorter and faster journeys across many routes. The services and routings that private coach operators select is a matter for them and their commercial considerations. As with local public transport, the Project is available for use by long distance coaches. Consideration of the use of the emergency access points onto Lower Thames Crossing by buses has been made	N/A	Matter Not Agreed

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		<p>proposals to run local buses" on LTC but does not explore why this is so, despite national and government policy advice (NPS NN & GD 300 – Requirements for new and upgraded all-purpose trunk roads (expressways)).</p> <p>2. The design does not enable public transport connections (buses) to serve residential or employment growth locations. In the absence of the Tilbury Link Road there is no convenient access for local public transport to the tunnel.</p> <p>3. The current configuration of the route does not allow effective connectivity for new local bus services connecting Kent and Essex and does not respond to measures for strategic cycle connections.</p>	<p>and it has been determined that their use in this way would not be possible. There are plans to work together collaboratively to help bring forward the Tilbury Link Road which would be able to provide additional network connectivity, particularly for local buses.</p> <p>Local Authorities are, best placed to lead on the development and appraisal of future public transport projects. They also have strong existing relationships and lines of communication with commercial bus operators as part of Local Transport Authority duties. National Highways is willing to work with authorities where appropriate. National Highways has established a Sustainable Transport Working Group (STWG) in parallel to the Project, with its primary purposes to maximise the benefits of the new crossing and develop sustainable travel initiatives that could be eligible for National Highways' Designated Funds Programme and to support cases for future investment. Should the Project gain consent, National Highways will use the STWG up until opening as a forum to engage Local Authorities and operators to build awareness and develop improvements to existing commercial services and potential new services to make best use of the opportunities provided by the new crossing. The STWG has already proposed several local priorities and opportunities for feasibility studies for future funding applications (as stated in the Sustainable Transport Complementary Measures report of March 2021). The report includes nine Stakeholder Priority Measures including ferry service improvements, feasibility studies for cycling and e-bike initiatives, and a Walking, Cycling and Public Realm Action Plan for</p>		

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			Tilbury. National Highways considers that supporting this collaboration between Local Authorities on both sides of the Thames (using the Designated Funds Programme) is the most effective and sustainable solution for providing such measures, which fall outside of the remit of the DCO, but may be facilitated to lead to improvements in sustainable modes and public transport.		
Utility Relocations	2.1.64	<p>The Council notes that there are 5 additional Nationally Significant Infrastructure Projects (NSIPs) related to significant power and gas diversions. Specific concerns include:</p> <p>1. Inadequate reporting in respect of individual utility diversions, especially within the technical assessment chapters of the ES, and no information has been provided on impact assessment or effects.</p> <p>2. Weak application of the undergrounding test. Neither the Planning Statement or the ES fully address the tests set out in NPS EN-5 and the commitments in the REAC does not adequately cover necessary commitments.</p>	<p>In relation to points 1, 4, 5, 6 the EIA assesses the impacts of the Project as a whole, rather than of individual component parts. This is consistent with the DCO being sought for the whole Project, rather than for individual elements. Any subdivision of the assessment is considered unnecessary, would be difficult to do, and would add considerable length and complexity to the ES. The screening exercise has been completed and presented in an appendix to Chapter 1 of the ES. Details of the proposed utility diversions were included in 2022 Local Refinement Consultation.</p> <p>In response to point 2, information from an options assessment undertaken by National Grid and from National Highways own assessment has informed the ES which has assessed the impacts of the diverted routes versus the baseline. It is provided in Chapter 3 of the ES and in Chapter 3 of the Planning Statement. Where the ambition to underground are not justified by the impact of the Project, engineering or environmental reasons, the Project is not empowered to alter a third parties' assets without justification. Alternative for key elements of the design, including the undergrounding of the overhead powerlines are described in chapter 3 of the ES and will</p>	<p>ES Chapter 1 - Introduction (6.1)</p> <p>ES Chapter 3 - Assessment of Reasonable Alternatives (6.1)</p> <p>Need for the Project (7.1)</p> <p>Planning Statement and the National Policy Statement (NPS) Accordance Tables (7.2)</p> <p>Planning Statement Appendix A National Policy Statement for</p>	Matter Not Agreed

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		<p>Additionally, whilst the various justifications provided by National Highways as to why undergrounding in specific locations is not proposed present a binary choice between the proposed OHL diversion and a specific (discounted) under-grounding design, without reference to potential wider OHL route changes that may well extend the length of diversions but could offer the potential to then under-ground route sections in more feasible locations and thus reduce overall environmental impacts from the utility route</p> <p>3. The need for and design of individual utilities diversions has been considered as a necessary consequence of the preferred route, rather than a major design consideration at the outset.</p> <p>4. Due to the above the Council cannot validate the NSIP screening conclusions</p> <p>5. Lack of clear identification and screening of proposed</p>	<p>also be assessed in Chapter 3 Project Evolution in the Planning Statement.</p> <p>The Environmental Statement Chapter 3 records the reasonable alternatives that have been considered as part of the Environmental Impact Assessment. The Planning Statement includes a chapter (Chapter 4) which records the Project evolution which assesses the project's accordance with the National policy statements. The Planning Statement Chapter includes information about the Nationally Significant Infrastructure Project utility diversions and associated works.</p> <p>In response to point 3, all of the proposed routes considered at the options stage of the project would have impacted on existing utilities and required their diversion. The nature of the routes for major utilities in the project area and the distribution of population centres indicate that all route options would have had the potential to require utility works that in themselves could qualify as Nationally Significant Infrastructure Projects. Assets such as National Grid's overhead powerlines and the gas Feeder Mains have been considered as an impact from the outset versus residents, and potential impacts on the environment. The need to divert them was communicated at the 2018 Statutory Consultation, and a re-appraisal of the options supports the selected route in the context of the utility networks, as reported in Chapter 4 of the Planning Statement. Further knowledge of the assets within the Project have been made known by the asset owners and the requirements to divert or protect them have been developed along with the Project design.</p>	<p>National Networks (NPSNN) Accordance Table (7.2)</p> <p>Planning Statement Appendix B National Policy Statements for Energy Infrastructure Accordance Tables (7.2) Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)</p>	

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		<p>works to confirm whether each qualifies as a NSIP in its own right or requires to be treated as an Associated Development.</p> <p>6. Lack of clarity regarding the identification of individual utilities. This also applies in terms of the ability to demonstrate 'compliance with reasonable alternatives requirements' within NPS EN-5.</p> <p>7. The extent of land-take required and likely impacts on communities and existing infrastructure, including in terms of disruption and safety.</p> <p>8. Information gaps - Information requirements for EN-1, EN-4 and EN-5 are the same as those set out within NPSNN, need to be addressed directly for the proposed utilities NSIP diversions within the Project.</p> <p>The Council consider that the above deficiencies significantly hinder the ability to clearly understand the types and levels of environmental</p>	<p>In response to point 7, the land take proposed for the diversion of utilities has been substantially refined through design development and further information on the land required and for which utilities has been included in the Works Plans and Land Plans submitted as part of the application documents. The majority of the land required for the utilities works will be temporary and will be reinstated following construction. All impacts of the land take are covered by relevant technical assessments such as the Environment Statement, with mitigation for impacts on communities covered by REAC items under a range of topics.</p> <p>In response to Point 8, the Application documents will provide clarity on the scope and scale of the utility works and the assessment of the project against all relevant National Policy Statements where relevant. Policy compliance tables considering EN-1, EN-4 and EN-5 are included as well as the assessment of compliance with these policies.</p>		

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		impacts and mitigation requirements associated with each proposed utilities diversion. In consequence, it is the Council's view that the Projects DCO does not clearly establish the environmental acceptability of all proposed diversions including the proposed utilities NSIP diversions in accordance with relevant requirements set out within EN-1, EN-4 and EN-5, including information requirements and requirement to assess all likely significant effects of the proposals.			
Specific comments on the oLEMP	2.1.65	<p>The Council raised the following:</p> <p>1. Ockenden Link: It will be important to ensure the sections adjacent to Orsett Fen complement the character of its habitat through appropriate design and species choice. It should complement the proposed Orsett Fen open space compensation land.</p> <p>2. Orsett Fen - Wetland Creation: The design should</p>	<p>The detailed reinstatement and planting scheme for these sites will be provided as part of the discharge of Requirements process (Requirement 5) should a DCO be granted. It is not appropriate to design to this detail at this stage in the Project.</p> <p>The Outline Landscape and Ecology Management Plan (oLEMP) and Environmental Masterplan will set out the parameters for planting across the project and will provide the framework for the detailed design stage. If the Project is consented, the Landscape and Ecology Management Plan (LEMP) will be developed in consultation with the local authorities including Thurrock Council, be based the Environmental Masterplan, and in line with the controls and commitments of the Design</p>	<p>Outline Landscape and Ecology Management Plan (6.7)</p> <p>ES Figure 2.4 Environmental Masterplan (6.2)</p> <p>Code of Construction Practice including the</p>	Matter Under Discussion

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		consider how it relates to the proposed Orsett Fen open space compensation land.	Principles and Register of Environmental Actions and Commitments (REAC). National Highways have shared the proposals in these areas including drafts of the above control documents. Further discussions will be carried out post application with the Council once the finalised documents have been shared.	Register for Environmental Actions and Commitments (6.3) Design Principles (7.5) Draft Development Consent Order (3.1)	
Route selection, modal alternatives & assessment of reasonable alternatives					
Appraisal of alternative configurations of the Project	2.1.66	National Highways have not tested any alternative configurations for various elements of the Project such as 1. the design of A13 junction 2. potential TLR connection and connections with local junctions 3. provision of local growth 4. connections with active travel and public transport modes 5. consideration of the utility diversions in the route selection	1. The design of the A13 junction During the development of the A13 junction National Highways considered the connectivity needed with the A13 junction by considering the key traffic movements between the A13, the A1089, and the new connectivity provided by the Lower Thames Crossing. A key consideration during the development of the junction was to minimise the impacts to the local area by making better use of the existing infrastructure. During the development, multiple factors were considered, including the land requirements, impacts on local traffic flows and on the environment, as well as cost. This assessment used professional judgment informed by the traffic model, rather than undertaking a sequence of detailed models of all possible alternatives as proposed by the Council.	Need for the Project (7.1)	Matter Not Agreed

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		<p>National Highways have provided insufficient modelling evidence in support of the evaluation of these alternative configurations. As a result, there is insufficient detail to understand the impacts (on the local road networks as well as residents, businesses, open countryside and designated environmental areas) and to determine mitigation.</p>	<p>As an all-movements junction would have led to significant additional land requirements and environmental impacts, the number of movements provided were reduced, with priority given to those movements that supported the project objectives of providing relief to the Dartford Crossing and approach roads, and supporting sustainable local development and regional economic growth providing regional economic benefit. The junction design was then further developed based on stakeholder feedback, and the design of the A13 junction has since evolved as a result. Following feedback from the Council and others, the A13 junction design has been updated and was consulted on in 2022. Outside of the scope of the Lower Thames Crossing, National Highways are also currently in discussions with the Council in relation to the merits of consideration of wider network developments that connect the strategic and local road network, such as the Tilbury Link Road.</p> <p>2. Tilbury Link Road (TLR)</p> <p>The Tilbury Link Road was not included in the project proposals consulted on at Statutory Consultation because it was not considered necessary to achieve the Transport Scheme Objectives of the Project. The Tilbury Link Road has been identified in the pipeline of projects in the National Highways road investment strategies for 2020-2030 (known as RIS2 and RIS3). During the review of the project undertaken when the Thames Freeport was designated, National Highways sought direction and received instruction from DfT and Department of Levelling Up, Housing and Communities (DLUHC) that the Tilbury Link Road should be delivered through a</p>		

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			<p>separate consenting process to the Lower Thames Crossing. Notwithstanding that, we have undertaken some additional traffic modelling of scenarios including the TLR to assist the Council in developing their position on the consideration of alternatives.</p> <p>Connections with local junctions / Provision for local growth</p> <p>Although the Council have identified locations for proposed connectivity with the Project to support the Local Plan and local growth, the plan for the area, including highways connectivity, has not yet been developed to a sufficient extent for us to be able to do any detailed analysis of that proposed connection. Local growth has been accounted for using the Government projected growth into the traffic model forecasts. It is clear that any future connectivity proposals with local junctions will need to take the latest LTC operation into consideration at that particular time of the proposal. As the Project is being designed to the latest standards, the implementation of future connectivity with local junctions will be compatible with our infrastructure and such connection is likely to be significantly simpler than for other areas of the strategic road network. Nevertheless, we have made significant design changes in the Tilbury area to accommodate a future local junction connection.</p> <p>3.Provision for local growth</p> <p>The current problems at the Dartford Crossing are regional level issues that have implications beyond the local areas. Therefore, the Project is a regional project rather than necessarily a project that solely seeks to cater for local growth. The Need for the Project</p>		

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			<p>demonstrates that there is a clear and compelling need to address the long-standing traffic problems at the Dartford Crossing, as well as an opportunity to provide capacity for sustainable local and regional economic growth. It also illustrates how the chosen Project meets the Scheme Objectives, how the existing issues in the Lower Thames area would be addressed by the Project and sets out the wide range of benefits and opportunities that can be expected.</p> <p>4.Connections with active travel and public transport modes</p> <p>The consideration of connections with active travel isn't necessarily carried out as an assessment of alternatives considered, but rather it forms part of an evolution of the project design of a selected route. Since the selection of the route, the Project design has evolved significantly to improve the existing routes for walking, cycling and horse riding. In terms of the proposed route, the relevant design standard GD-300 requires that 'Walkers, cyclists, horse-riders and slow-moving vehicles are prohibited' for the design level (Level 3) of the Project, in order to enhance the safety and operational performance of the road. Consideration of the use of the emergency access points onto the Project has been made and it has been determined that their use in this way would not be possible. National Highways proposes to work collaboratively with the Council outside of the scope of the Project to help bring forward the Tilbury Link Road which would be able to provide additional network connectivity, particularly for local buses.</p> <p>5. Consideration of utility diversions</p>		

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			<p>The location of utilities was a factor in the consideration of route selection, which fell under the engineering element of route selection. As engagement with utility companies developed, alterations to the preferred route were made. Also, several amendments to the Project have been made in response to emerging details of utilities within the area. Examples of these include the movement of the route by 200m to the south west around South Ockendon and the movement of the route by 50m by Linford to avoid the need for major changes for the overhead line network. The initial route selection considered the location of utilities (as a major design consideration). As our understanding of the location of utilities developed efforts were made to change the alignment to address potential conflicts and a number of amendments were made. Where conflicts remain we have been working hard with our utility stakeholders to develop solutions which minimise environmental impacts (for example the change in working area between supplementary consultation and the more recent community impacts consultation).</p> <p>National Highways use traffic modelling to inform its option identification and to provide baseline information for assessment. National Highways do not require the traffic modelling to do any option testing to understand these scheme impacts.</p>		
Preferred Route Selection	2.1.67	The Council continues to take the view that the 2016 public consultation did not provide satisfactory comparative evidence for alternative route	The 2016 public consultation provided robust comparative evidence for alternative route alignments A and C. Extensive transport modelling evidence was presented at the time of the 2016 public consultation in the Scheme Assessment Report - Volume 5 - Traffic and	N/A	Matter Not Agreed

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		<p>alignments A and C, and that the approach to deciding the preferred route was methodologically inadequate. No transport modelling evidence was presented at that time to substantiate the strategic choice made.</p> <p>The Council would like additional information on the methodology of the sifting process, particularly how the options were weighted. The options were assessed against the Scheme Objectives, however, the Council does not agree with some of the major design elements (such as, A13 junction) or the detail of the layout of that route.</p>	<p>Economics Appraisal to substantiate the strategic choice made. Furthermore, the Section 4 (Traffic Impacts) of the Operations Update in the 2021 Community Impacts Consultation presented sufficient transport modelling evidence for future growth scenarios in Thurrock and consideration of impacts on the Local Road Network. In addition the revised Planning Statement includes a Project Evolution Chapter (Chapter 3) which tells the story about the project, the options, alternatives and how the pre-application process has impacted on the DCO application and project design.</p> <p>The options were reviewed in the round using professional judgement by technical specialists (e.g. traffic benefits, environment impacts, engineering feasibility, costs, etc) considering all the Projects objectives. This is evidenced in the Appraisal Summary Tables in the Pre-Consultation Scheme Assessment Report Volume 7 Appendices, as well as the Tables 3.1 and 4.1 of the Post-Consultation Scheme Assessment Report Volume 7, which are all published as part of the 2016 consultation.</p> <p>The Council disagree with the Project position set out above.</p>		
Testing scheme alternatives for Thurrock Council	2.1.68	<p>The Council has suggested a number of alternatives for testing, including:</p> <ol style="list-style-type: none"> 1. LTC with a Tilbury Link Road. 2. LTC with different configurations of the 	<p>In response to point 1, National Highways are modelling the Project with a Tilbury Link Road to assist Thurrock Council, although this is outside the scope of the Project.</p> <p>In response to point 2, during the development of the A13 junction National Highways considered the connectivity needed with the A13 junction by considering the key traffic movements between the A13, the A1089,</p>	N/A	Matter Under Discussion

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		<p>connections to the A13 and with a Tilbury Link Road. Some progress has been made on developing suitable models for testing these alternatives over the last 18 months, this work has not been completed. The Council consider that further modelling work is required to either justify the current configuration or propose an alternative for the A13 junction.</p>	<p>and the new connectivity provided by the Lower Thames Crossing. A key consideration during the development of the junction was to minimise the impacts to the local area by making better use of the existing infrastructure.</p> <p>During the development, multiple factors were considered, including the land requirements, impacts on local traffic flows and on the environment, as well as cost. This assessment used professional judgment informed by the traffic model, rather than undertaking a sequence of detailed models of all possible alternatives as proposed by the Council.</p> <p>As an all-movements junction would have led to significant additional land requirements and environmental impacts, the number of movements provided were reduced, with priority given to those movements that supported the project objectives of providing relief to the Dartford Crossing and approach roads, and supporting sustainable local development and regional economic growth providing regional economic benefit. The junction design was then further developed based on stakeholder feedback, and the design of the A13 junction has since indeed evolved as a result. Following feedback from the Council and others, the A13 junction design has been updated and was consulted on in 2022. National Highways are also currently in discussions with the Council in relation to the merits of consideration of wider network developments that connect the strategic and local road network, such as the Tilbury Link Road, which is being considered separately to the Lower Thames Crossing.</p>		

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Future Proofing the LTC	2.1.69	<p>The Council query what future proofing of the road can be done to provide for sustainable transport solutions and support the Government's commitment to reduce carbon emissions by 78% by 2035. In the Council's opinion, it would not be in the public interest to have to retrofit at great expense adjustments to the tunnel and associated works, which had only just been completed. The Council would welcome comments on how National Highways has engaged with the design requirements to accommodate the future change in public transport demand and use.</p> <p>1. The design excludes trains, trams, light rail, electric bikes, and scooters. Any future provision of these modes would require expensive retrofitting as the design is not future proof to accommodate the future changes in public transport demand and use.</p> <p>2. There is no mention of safeguarding the Project for</p>	<p>The Project would be designed as an all-purpose trunk road. The decision to restrict certain types of vehicles has three key areas of consideration:</p> <ul style="list-style-type: none"> • The standard (GD300) that Project is designed in accordance with requires that 'Walkers, cyclists, horse-riders (WCH) and slow-moving vehicles are prohibited' for the design level (Level 3). This is to enhance the safety and operational performance of the road. • To the south of the A13 the tunnel is a critical factor. Non-motorised and slow-moving vehicles are prohibited from using the tunnel, to achieve a consistent travel speed through the tunnel, reducing the likelihood of stoppages, overtaking manoeuvres and lane changing within the tunnel. • To the north of the A13 the majority of traffic joins to/from the M25. To achieve route consistency and to minimise the need for complex signage, the same vehicle restrictions are proposed for this section of the carriageway. <p>National Highways have recognised that as a result of advancing technology, the Transport Decarbonisation Plan and Net Zero by 2050 targets, new technologies such as Connected and Autonomous Vehicles will emerge. The timescales and exact nature of these interventions is currently unknown as is the policy and legislative framework in which they will sit. In absence of this, National Highways, nor other highway authorities are not able to make adaptations to either existing or proposed infrastructure. It is clear that the delivery</p>	N/A	Matter Not Agreed

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		<p>future upgrades such as autonomous vehicles.</p> <p>3. There is no mention of bus routes or allowing for bus priority (in key areas such as the A1013) within the Design Principles and the design does not enable buses to serve efficiently existing centres and growth locations (residential or employment).</p> <p>The Council note that the use of rail has been ruled out by DfT due to a poor business case, but no similar references were observed regarding bus routes, priority bus lanes or autonomous vehicles.</p>	<p>mechanisms for any future technology will need to be cost-effective implementation across the entire road network that exist at that particular time of implementation. As the Project is being designed to the latest standards, the implementation of future technology will be compatible with our infrastructure and such retrofitting is likely to be significantly simpler than for other areas of the strategic road network. We are unable to provide further detail or discussion on this element without government policy.</p> <p>The whole Project route would be available for public transport, if operators choose to use it. National Highways is not a public transport operator, and so we are not proposing to run buses as a result of the Project. However, the Project does provide additional connectivity across the Thames and is fully available for use by public transport operators should they choose to make use of them. Furthermore, consideration of the use of the emergency access points onto Lower Thames Crossing has been made and it has been determined that their use in this way would not be possible.</p> <p>National Highways consider that Local Authorities are best placed to lead on the development and appraisal of future public transport projects. They also have strong existing relationships and lines of communication with commercial bus operators as part of Local Transport Authority duties. National Highways is willing to work with authorities where appropriate. National Highways has established a Sustainable Transport Working Group (STWG) in parallel to the Project, with its primary purposes to maximise the benefits of the new crossing</p>		

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			and develop sustainable travel initiatives that could be eligible for National Highways' designated funds and to support cases for future investment. Should the Project gain consent, National Highways will use the STWG up until opening as a forum to engage Local Authorities and operators to build awareness and develop improvements to existing commercial services and potential new services to make best use of the opportunities provided by the new crossing. National Highways considers that supporting this collaboration between Local Authorities on both sides of the Thames is the most effective and sustainable solution.		
Transport Modelling for resilience to future change	2.1.70	<p>The Project's design is for a life span of some 100 years, yet there is no modelling for resilience to future change, such as travel trends, mode shift and emerging technologies. The Council would require further testing to consider these scenarios.</p> <p>The Council acknowledges that National Highways is preparing modelling of the implications of local strategic growth (i.e. indicative Local Plan tests) on the operation of the Project and the consequential effects on the local road network. The Council is unable to wholly</p>	National Highways have recognised that as a result of advancing technology, the Transport Decarbonisation Plan and Net Zero by 2050 targets, new technologies such as Connected and Autonomous Vehicles will emerge. The timescales and exact nature of these interventions is currently unknown as therefore is the policy and legislative framework in which they will sit. In absence of this, National Highways, or other highway authorities are not able to make adaptations to either existing or proposed infrastructure. It is clear that the delivery mechanisms for any future technology will need to be implemented cost-effectively across the entire road network that exists at the particular time of implementation. As the Project is being designed to the latest standards, the implementation of future technology will be compatible with our infrastructure and such retrofitting is likely to be significantly simpler than for other areas of the strategic road network. National	N/A	Matter Not Agreed

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		comment on those effects until that testing has been received, and, therefore, currently remains concerned that the proposals do not recognise the importance of local sustainable growth and connectivity.	Highways are unable to provide further detail or discussion on this element without government policy. National Highways have offered to provide model runs for Thurrock Council, including local plan growth. These runs, which fall outside the guidance on the approach to including development into the modelling have been offered to support Thurrock Council in developing their local plan and are not considered to be a matter relating to the DCO submission.		
Consultation and engagement					
Prematurity of the Local Refinement Consultation (LRC)	2.1.71	The Council considers the LRC to have been premature due to ongoing work, which may lead to further consultation/changes once completed. This includes: <ol style="list-style-type: none"> 1. Traffic modelling work - including LTAM traffic modelling work as well as development and use of local traffic models 2. Ongoing environmental assessments which could lead to further mitigation and scheme changes 3. Policy changes including further provision and scheme changes to accommodate recent policy changes re 	Careful consideration was given to the timing and proposed changes consulted on at the LRC, following project development and feedback from previous consultations. National Highways have reviewed all stakeholder comments made at the consultation, whilst finalising its design for submission. The precise submission date for the application was chosen to allow sufficient time for the Project to develop as a result of stakeholder feedback. The design submitted in the DCO application will be subject to further scrutiny and development as a result of the examination process. <p>In response to Point 1, National Highways consider that the modelling work undertaken in parallel to the consultation would not result in changes beyond that allowed for in the flexibility provided through the limits of deviation, and that could be addressed through detailed design. Had the model identified that changes were required, then there would have been a need for further consultation, which National Highways acknowledges. However, this proved not to be the case.</p>	N/A	Matter Not Agreed

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		decarbonisation, active travel and public transport provision	<p>In response to Point 2, the same principle applies to the environmental assessments. Development of a project is an iterative process, with early design, assessments and consultation informing the development of a final design which is assessed and presented within the consent application. National Highways has undertaken a number of iterations, informed by a series of developing assessments and consultations.</p> <p>In response to point 3, the Planning Statement details the national and local policy context and assessed the project within this policy context. Policy formulation is dynamic and National Highways will respond to emerging policy as requested during the Examination process.</p>		
Inadequacy of consultations and Public Environmental Information at Statutory Consultation	2.1.72	<p>The Council are concerned that the consultations undertaken have been inadequate. Concerns include:</p> <ol style="list-style-type: none"> 1. The duration of the consultations, considering the complexity and scale of the materials provided 2. The broader accessibility of the consultation materials and the volume of documents for the wider public 3. The provision of events, where events were not held within key communities 4. The level of detail provided in the consultation materials, 	<p>National Highways strongly disagrees with the position set out by Thurrock Council.</p> <p>In response to point 1, National Highways has carried out consultation at appropriate periods during the Project's design and development. At each stage of consultation, National Highways provided appropriate and clear environmental information to allow the public and stakeholders to understand the potential impacts of the proposals on the environment and local communities. The durations of the consultation periods are sufficient and proportionate to the nature of the content which has been included in each of the consultations undertaken.</p> <p>In response to point 2, National Highways believes the volume of material shared at the consultation is proportionate to the scope and nature of the consultation as well as a direct response to stakeholder (including Thurrock Council's) feedback. For example, details of the</p>	N/A	Matter Not Agreed

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		<p>including for example the level of detail provided in the Preliminary Environmental Information during the Statutory Consultation</p> <p>5. As a consequence of this, the Council have concerns that the public have not been sufficiently consulted on key aspects of the proposals.</p> <p>The Council have concerns that the consultation has been inadequate for vulnerable or hard to reach groups. The inadequacies identified above mean that the views of key groups, including the elderly, those with disabilities, people who may not be able to read, and people for whom English is not their first language. The Council received technical documents alongside the consultation documents, which limited the council's opportunity to reflect understanding of detailed technical information into the consultation response.</p> <p>The information presented in the Preliminary Environmental</p>	<p>proposed impacts and mitigation at the local (ward) level, were previously requested, which led to detailed ward summaries. We appreciate that these summaries were detailed documents due to their nature and scope, however they were clearly labelled to ensure the public only had to read their individual sections. More details on construction effects and mitigation were also requested and this led to a construction (and an operational update) document. It was also an ongoing request from the Council to share the draft control documents (and the mitigation contained within them), therefore all the control documents were made a part of the CIC. As the documents were developed, accessibility was a key consideration. The document hierarchy was developed to allow readers to access information through the Guide to Consultation, and then enter into more detailed materials via the Ward Summaries, with provision of the control documents for those who wanted to understand the detailed legal framework of control. Other tools, such as the interactive map, were also provided to assist with accessibility.</p> <p>National Highways were cognizant of the time and effort required to review all these documents in time. Therefore, control documents were shared in a phased manner, with several documents being made available up to 3.5 weeks before the commencement of the formal consultation. National Highways also altered the length of consultation and its timing following consideration of Thurrock Council's concerns over timing and the pre-election period. National Highways also organised webinars and telephone call back services for the local</p>		

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		<p>Information Report (PEIR) during the Statutory Consultation and the ES Update Reports during the Supplementary Consultation and the Design Refinement Consultation did little to provide the public with information to review and understand the baseline conditions and develop an informed view of the likely significant environmental effects.</p>	<p>public during consultation to ensure feedback and concerns were picked up.</p> <p>In response to point 3, National Highway considers that the provision of events as been adequate. The programme of consultation events has been chosen and based on the areas directly affected by the consultation proposals as well as other factors such as attendance levels at events for previous consultations. National Highways has made efforts to make sure the locations of venues were as evenly spread as possible so that it would be possible for residents to travel a relatively short distance to attend one, should they wish to.</p> <p>In response to point 4, the PEIR published at Statutory Consultation provided sufficient environmental information to allow consultees to take an informed view of the Project and provide their consultation feedback. National Highways followed the relevant regulations, paid attention to guidance notes and industry best practice and, where appropriate, involved relevant stakeholders in the development of the PEIR. The PEIR was produced to include the environmental topics in line with the scoping report and the approach to the Environmental Impact Assessment (EIA) was updated to reflect the Scoping Opinion. The response to the Scoping Opinion is set out line by line in the Environmental Statement (ES) submitted as part of our DCO application. National Highways has also had further discussions with relevant stakeholders to discuss and agree the scope of certain assessments, as the scoping opinion requested. The information presented in the PEIR included a detailed description of the policy and legislative requirements for</p>		

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			<p>the Project, and it set out how the Project would respond to areas of concern in the ES.</p> <p>National Highways consider that the PEIR was a robust representation of the impacts of the project and met the requirements set out in both legislation and guidance. Nevertheless, we recognise that there was concern from the Council about the consultation with the community in Thurrock. We therefore undertook a further consultation in 2021, the Community Impacts Consultation, which presented the impacts on a localised level.</p> <p>The Community Impacts Consultation (CIC) materials included the Ward Impacts summaries document which provided an overview of the changes and impacts the Project may have during its construction and operation within the wards. The summaries covered 12 topics including traffic, noise and air quality.</p> <p>In response to point 5, National Highways' view is that a comprehensive programme of consultation has taken place which has received over 90,000 responses. National Highways put in place measures to ensure that those with limited or no access to computers or the internet could participate. These measures have included the delivery of leaflets addresses across the area where the Project would be situated, letters to people with an interest in land that would be affected by the Project, as well as public notices in local newspapers. National Highways has also arranged for alternative formats such as braille, where requests have been received and organised BSL interpreters at specific events or online videos/webinars. Easy read versions of consultation documents have also been produced.</p>		

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			<p>Furthermore, during the Design Refinement, Community impacts and Local refinement consultations it has been possible to request the delivery of copies of the consultation material free of charge and a telephone service was introduced. Responses could be submitted via the telephone and, if further information was required, it was possible to speak to a member of the Project team on the telephone. A range of information points and deposit locations where leaflets and paper consultation materials were available in the local community.</p> <p>At each stage of consultation, National Highways has asked respondents about how each consultation was delivered including the quality of consultation materials. From this information, the following positive feedback has been determined:</p> <p>Statutory consultation, 67% of respondents who answered the question said the information provided was 'Very good' or 'good'.</p> <p>Supplementary consultation, 54% of respondents who answered the question said the said the information provided was 'Very good' or 'good'.</p> <p>Design refinement consultation, 49% of respondents who answered the question said 'Very good' or 'good', when asked was the information presented clearly and was it easy to understand.</p> <p>Community impacts consultation, 63% of respondents who answered the question chose 'Very good' or 'good', when asked was the information presented clearly.</p>		

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			Local refinement consultation, 46% of respondents who answered the question chose 'Very good' or 'good', when asked was the information presented clearly.		
Response to Community Impact Consultation (CIC) and Other consultations	2.1.73	National Highways has provided limited feedback on the outcome of the consultations, both to the public and to the Council. Thurrock Council are unclear on how the consultation responses have influenced the proposals and consider that as a result there is insufficient mitigation proposed that responds to the consultation concerns. The National Highways document used stock responses making it quite repetitive, and only provided responses on those matters that had the highest number of respondents. In addition, it is unclear whether National Highways reviewed diversity monitoring data during the consideration of issues. National Highways states confidently that it has designed a scheme that adequately mitigates impacts and provides benefits to the	National Highways strongly disagrees with the position set out by Thurrock Council. Extensive efforts to communicate how feedback from individuals and stakeholders has been considered and acted upon, and we will provide additional information as part of our DCO submission, via the Consultation Report. National Highways considered all feedback and paid attention to responses commenting on scheme design and the proposed mitigation. In response to the feedback submitted, changes were to some parts of the proposals. For example; <ul style="list-style-type: none"> In the Supplementary Consultation and Design Refinement Consultation guides, National Highways presented an overview of the key changes to the proposals and the rationale for implementing these, including the provision of photographic montages showing the changes. In addition, responses to issues raised as part of our Consultation Report were shared with local authorities in October 2020 as part of our DCO submission. This document summarised the issues raised during statutory, supplementary and design refinement consultation, as well as providing responses from the project to those issues. In the 'You Said, We Did' document published during the Community Impacts Consultation in 	Consultation Report and its appendices (5.1)	Matter Not Agreed

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		<p>local community. National Highways' confidence in its proposals being transformative and responding to public comments belies the barrage of negative technical comments and questions from the Council and other key stakeholders. The tone and the narrative of the document is misleading. In reality, the scheme provides inadequate levels of mitigation in key areas and there is a need for improved design with more meaningful engagement with the council. The statistics used by National Highways are also unrepresentative of the public opinion, as most residents remain opposed to the scheme</p>	<p>July 2021, National Highways summarised the responses received during the statutory, supplementary and design refinement consultations. How those responses have been considered and have influenced the Project during its extensive design and development phase were also summarised.</p> <ul style="list-style-type: none"> • The "Response to community impacts consultation" document published at Local Refinements Consultation, provided readers with a summary of the key themes to emerge from what was necessarily a complex and varied set of responses to the consultation, and to explain National Highways' position on those issues. The intention was not to provide a point by point analysis of every issue raised in each response and an accompanying National Highways position, because to do so would be inconsistent with the objective of a summary document that is accessible to non-technical readers. The document consistently acknowledged that there is opposition from some consultees to different elements of the Project proposals, alongside support for many of the same elements, and aimed to describe the ways in which those concerns have been or will be addressed as part of our ongoing development. • Additionally, National Highways have also explained during regular meetings with local authorities the rationale for taking on board some feedback, while rejecting other suggestions. 		

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DCO programme and submission date	2.1.74	<p>Thurrock Council consider that there are still key elements of engagement that have not concluded. Key ongoing issues include:</p> <ol style="list-style-type: none"> 1. the ongoing traffic modelling work 2. discussions over the strategic connectivity of the project and impact on local roads, including the Tilbury Link Road 3. the outcomes of the latest environmental & health assessments 4. the updates to the Control Documents following Thurrock Council review <p>As a result, Thurrock Council consider that further engagement is required in order to allow these ongoing technical discussions to be undertaken in a proper and thorough way, that the proposed DCO submission date in late 2022 is premature and that there will be a lack of time to account for consultation comments. This means that</p>	<p>National Highways consulted on limited changes to the scheme in 2022 as part of the Local Refinement Consultation. The feedback was received and subjected to the feedback review processes in place within the Project. All comments made by stakeholders were reviewed and final proposals refined in light of the feedback. The targeted submission date has been identified taking account of the necessary design revisions that may form part of the post consultation feedback review. National Highways is confident that sufficient time has been programmed to allow for these changes to be made.</p> <p>With regard to items 1 and 2, National Highways are satisfied that the information shared with Thurrock Council is appropriate and sufficient to set out the nature of the project and for Thurrock Council to understand both the decision processes that led to the current design and the changes to traffic flows across the region resulting from the proposals. Nevertheless, National Highways will continue to engage with Thurrock Council on these matters.</p> <p>In response to point 3, National Highways shared the entire withdrawn DCO application in December 2020, including the full environmental and health assessments. Comments made on these documents were responded to and incorporated into the SOCG Issue Logs. National Highways explained the project approach to sharing the revised assessments in the CIPHAG meeting on the 9th December 2021. A schedule of environmental information was shared and discussed in the CIPHAG meeting in May 2022; outlining the changes to the</p>	<p>ES Chapter 5 - Air Quality (6.1)</p> <p>ES Chapter 12 - Noise and Vibration (6.1)</p> <p>Health and Equalities Impact Assessment (HEqIA) (7.10)</p>	Matter Not Agreed

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		<p>there has not been an adequate amount of time for National Highways to consider and incorporate comments into its DCO documentation. It is Thurrock Council's view that the lack of issue resolution may increasingly challenge the examination timetable.</p>	<p>environmental disciplines since the first DCO submission. Furthermore, National Highways briefed the relevant authorities, including Thurrock Council, on the findings of the finalised assessments (focussing on impacts and mitigation) prior to the submission of the DCO application. The final traffic modelling and environmental information related to air quality, noise and health impacts is available with the DCO application. National Highways highlight that Thurrock Council have opportunity to make further representation through the Local Impact Reports.</p> <p>In response to point 4, National Highways highlight that the control documents and the Statements of Common Ground will remain as live documents and evolve in the period between submission and examination. This is indicative of the position the Project takes that the Project will benefit from refinement through the whole DCO application process, and National Highways recognises that the position at submission is not the final position for the Project. The Project has run a thorough issue review and resolution engagement process, grounded in the triaging and grouping of issues, and the project team has worked collaboratively with the Thurrock team to resolve these issues through bilateral and multilateral engagement.</p>		
Lack of progress of technical issues	2.1.75	Thurrock Council are not satisfied with the process of engagement undertaken by National Highways. While there have been extensive meetings and exchanges in	<p>These concerns are noted.</p> <p>National Highways has established a workstream-based issue resolution process to address technical issues. National Highways has engaged extensively with Thurrock and other local authorities by triaging and</p>	Statement of Engagement (5.2)	Matter Not Agreed

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		<p>correspondence, there remain many outstanding issues and there has been a lack of progress in resolving key technical discussions.</p> <p>The Council believes that there are many critical, valid and acceptable points that could be built into the scheme prior to re-submission that would greatly improve the scheme. Such changes, if accepted by National Highways, would offer the Planning Inspectorate (PINS) a greater chance of dealing with all such issues within the 6-months period of the Examination, otherwise it will be challenging, as so many issues will be outstanding and the SoCG would be substantively negative.</p>	<p>grouping issues into groups 1, 2, 3, based on their significance. Further explanation of these groups is presented in the Statement of Engagement. Since December 2021, National Highways have provided technical responses to over 1,100 Group 1 issues and over 800 Group 2 issues. National Highways has also engaged on over 550 Group 3 issues, marked as fundamental matters, through the course of 2022. This represents a collaborative approach to working together to resolve a range of issues. Where specific issues need focussed meetings, these have been arranged, e.g. 10 fortnightly sessions on construction traffic impacts have been arranged between May-September 2022 with commitments and interventions discussed live.</p> <p>During these sessions the scope of requests has often changed significantly at the request of the Council, often during negotiations. A good example of this is the commitment to transport bulk aggregates through ports. The lack of a commitment was highlighted by Thurrock Council and categorised as a significant issue; however when a commitment was presented, the Council's response was for the Project to address several more comments and refusal to agree the matter in principle, until each and every subsequent ask was also agreed in full.</p> <p>In most cases, when the project position differs from the position adopted by the Council, the Council present this as a 'lack of progress' rather than adopting an approach of acknowledging National Highways position.</p> <p>The fact that National Highways and Thurrock may disagree on a number of issues is not reflective of</p>		

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			<p>inadequacies in the engagement process. As the Council has made clear, for example in response to issue 2.1.57 above, it objects to the Project and while National Highways is committed to ongoing engagement with Thurrock, there may be some issues on which the parties will be unable to reach agreement. This is in spite of the thorough engagement that has taken place to date and will continue throughout the examination process.</p> <p>National Highways considers that pre-application discussions have been taken as far as they can and that there is no merit in holding more discussions prior to application. The over-arching thrust of this feedback from Thurrock will be addressed in the Statement of Engagement.</p> <p>The Council disagree with the Project position set out above.</p>		
Detailed comments on CIC Consultation documents (Group 1a)	2.1.76	Thurrock Council made some detailed technical comments on documents during the CIC which are not due to be updated e.g. Ward Summaries, <i>You said we did</i> , Construction update, operational update. In the Council's opinion, many matters (circa 244) in these documents, particularly the Ward Summaries could be considered misleading, inaccurate or overly positive,	<p>The detailed comments made by the Council at the Community Impacts Consultation are too granular to present in this SoCG. In summary, these comments cover specific concerns primarily related to ES documents and other technical assessments which the technical leads needed to be aware of when completing their assessment.</p> <p>These comments were categorised separately and were circulated to respective technical leads for consideration and incorporation where appropriate, during the preparation of the final DCO application documents.</p> <p>Although these additional comments offer a further level of granularity, they are already well represented in principle in this document.</p>	N/A	Matter Not Agreed

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		when the impacts could be more significant.			
Lack of updated traffic and environmental (including air quality, noise, updated Health and Equality Impacts Assessment) assessments	2.1.77	<p>Thurrock Council are concerned that the public consultations (particularly CIC and LRCon) are based on earlier iterations of the traffic and environmental assessments, and that the information on impacts set out in the consultation may therefore not reflect the final outcomes of the assessments. Updated construction traffic modelling and other assessments have not been issued with consultation material and this is vital evidence that helps understand impacts on the road network and local communities and informs the development of appropriate design changes and mitigation measures.</p> <p>National Highways have not provided detailed technical information (traffic modelling, environmental assessments and utilities' construction assessments) in sufficient time</p>	<p>National Highways maintain that the information provided on traffic, air quality and noise impacts, during both public consultation and engagement, has been sufficient to understand the Project-wide and localised impacts of our proposals, and to determine the suitability of the mitigation. During the Community Impacts Consultation this information was set out on a localised basis in the ward summaries, then during the Local Refinement Consultation the Guide to the Consultation set out the proposed changes to the project, and again confirmed the validity of this information previously released. It should be noted that during the consultation and engagement over the past few years, Thurrock Council have made a number of recommendations for additional mitigation, such as low noise surfacing, increased bunding, and National Highways has incorporated these recommendations into the proposals.</p> <p>The traffic modelling outputs are being regularly discussed with the Thurrock team on a fortnightly basis (via the traffic modelling workshops and strategic discussions). The scope of this work has already been agreed with the authority and a programme of outputs has been shared, which will be revised continuously as necessary over the coming months. This ongoing work includes microsimulation modelling at key junctions to provide additional assurance alongside the cordons of LTAM and GIS shapefiles. The operational cordon models were shared with Thurrock Council in April 2022 and the construction cordon models in May 2022, we</p>	N/A	Matter Not Agreed

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		<p>for Thurrock Council to consider and respond, allowing National Highways to make needed changes in advance of freezing the proposals for the DCO submission. Thurrock Council are also concerned that some of the ongoing local modelling workstreams need linking to conclude activities such as the Strategic Traffic Modelling to confirm the robustness of those core assessments.</p>	<p>look forward to Thurrock Council's review of these cordons. National Highways are confident that the modelling undertaken is representative, and that the Project design is robust. The ongoing modelling exercises will support the detailed design process.</p> <p>National Highways has shared the full suite of DCO documents, including the full traffic assessment(s), air quality, noise and health assessments in December 2020, following the withdrawal of the first DCO application. Following this technical engagement has continued in all the areas highlighted above via regular meetings, SOCG issue log discussions and topic specific technical workshops (for topics such as modelling). Further details are presented in Appendix C. National Highways explained the project approach to sharing air quality and noise assessments in the CIPHAG meeting on the 9th December 2021. A schedule of environmental information was shared and discussed in the CIPHAG meeting in May 2022; outlining the changes to the environmental disciplines since the first DCO submission. Furthermore, National Highways briefed the relevant authorities, including Thurrock Council, on the findings of the finalised noise & air quality assessments (focussing on impacts and mitigation) prior to the submission of the DCO application. The final traffic modelling and environmental information related to air quality, noise and health impacts will be available with the DCO application. Thurrock Council will then have opportunity to make further representation through the Local Impact Reports. Technical engagement with the Council is ongoing and continues to be a valuable opportunity to address issues</p>		

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			and allow for meaningful engagement and input from Local Authorities.		
Detailed comments on minor (Group 2) issues	2.1.78	Thurrock Council provided comments on some draft DCO documents, which they would like to re-check against the next iteration of the respective documents (at DCO submission) before formally agreeing that the individual issues are resolved. The total number of these issues is 405.	The individual comments referred to by the Council are matters that were jointly agreed to be categorised as Group 2 matters and are thus to be managed outside of this Statement of Common Ground., however together they are being presented as a single entity here for the purposes of this SoCG. National Highways understood that once the DCO documents are available following application, the Council would check that their comments have been adequately addressed before formally agreeing that the matters are resolved. This matter will remain under discussion until this exercise had been completed.	N/A	Matter Under Discussion
Outstanding minor (Group 2) issues	2.1.79	Although National Highways have provided responses to 928 Group 2 matters, they are yet to provide commentary of approx. 400 Group 2 matters.	Responses to the remaining matters will be provided following completion of the application documents and shared with the Council in line with the established process.	N/A	Matter Under Discussion
Land and Compulsory acquisition					
Inadequate provision for compensation: Detailed	2.1.80	Thurrock Council consider that there is an inadequate provision for compensation to residents and businesses affected beyond that covered in statutory provision, particularly covering non-	National Highways adheres to current legislation and government guidance in relation to compensation which is detailed in our suite of booklets. Additionally, National Highways regularly meet with local residents and local businesses to discuss specific concerns and agree specific mitigation wherever possible.	Statement of Reasons (4.1) Statement of Reasons - Annex C - Land	Matter Not Agreed

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comments on the 'Your Property and Compensation or Mitigation for the Effects of Our Road Proposals' document		<p>statutory compensation, respite stays, additional noise mitigation and off-line discretionary purchase. The policies provide limited comfort due to their discretionary nature and lack of specific details (including application process, response timeframe and support etc.).</p> <p>Thurrock Council have made detailed comments and recommendations in respect of each policy contained within the 'Your Property and Compensation or Mitigation for the Effects of Our Road Proposals' Document published by National Highways.</p> <p>National Highways must include reference to this financial compensation available as part of the HEqIA mitigation.</p>	<p>As part of ongoing engagement with local communities and people impacted by the proposals, National Highways have had a lot of discussions to help assess the potential impact on people and local businesses on a case-by-case basis. In a number of cases National Highways has already provided funding for specific professional advice to assist people with finding alternative premises or advising on the specific impacts of the scheme.</p> <p>National Highways has been in regular correspondence with the affected parties. Application information has been provided in our letters and also in notices published in the local press. The Project's website also provides contact details for anybody that has any queries. National Highways are willing to meet with anybody who has queries in relation to these matters to talk them through the processes and procedures that would apply to their personal circumstances.</p> <p>The statutory financial compensation is required by current legislation. As a result we don't include this as mitigation as it is already a legal obligation.</p>	<p>Referencing Methodology (4.1)</p> <p>Book of Reference (4.2)</p> <p>Funding Statement (4.3)</p>	
Thurrock's Land Interests - likely impacts	2.1.81	The Statement of Reasons provides limited justification for the compulsory temporary possession powers being sought or the requirement for	For Thurrock owned land, a thorough exercise has and will continue to be undertaken with the Council and their land and property advisors to work through each land plot affected and to provide a full justification and indicative timescales for the applicable Project works to	Statement of Reasons (4.1) Statement of Reasons - Annex C -	Matter Under Discussion

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and compensation requirements		<p>the permanent acquisition of Thurrock Council land to facilitate the Scheme. Due to positive engagement on the likely effects on Thurrock-owned land, there is a thorough assessment of likely impacts or compensation requirements on the 142 remaining land parcels in Thurrock ownership, through proposed permanent and temporary acquisition and rights. Discussions are still required as to how the assessment of land parcels information can be secured in a separate agreement.</p> <p>In relation to parcels required on a permanent basis, Thurrock Council have raised specific concerns and site specific queries on the following sites:</p> <ul style="list-style-type: none"> • Land to the West of Gammonfields Way • Land at A13, Orsett Grays 	<p>be undertaken. This is being worked through in a series of technical review meetings.</p> <p>Work has also been ongoing between the Project, the traveller community at the Gammon Field site and Thurrock Council. It has been agreed that the intention of all parties is to design up to the end of Royal Institute of British Architects (RIBA) Stage 3 and to have an indicative site layout that is presented at examination which has been agreed by the Travellers and the Council. The cost of the new site and moving will covered by National Highways in line with the guidance within the Statutory Compensation Code. To date RIBA stage 2 has been finalised and the Project are about to seek views on the details of the pitch layouts with the Travellers after agreeing two options with the Council.</p> <p>In relation to parcels required on a temporary basis, the Project has shared details of the temporary works and construction timelines for utility works with the Council. Further detail will be forthcoming in due course as the scheme progresses. Temporary possession under the DCO allows land to be taken for as long as it is required. The Project will not restrict this further.</p>	<p>Land Referencing Methodology (4.1)</p> <p>Book of Reference (4.2)</p> <p>Funding Statement (4.3)</p>	

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		<ul style="list-style-type: none"> • Public Highway, Footway and Verge (Baker Street, B118) <p>Site specific queries have also been raised in respects of land at Fort Road, Tilbury which is required on a temporary basis. Further work is required on the Statement of Reasons or a separate Agreement setting out adequate provisions. There are ongoing discussions regarding each land parcel owned by Thurrock Council to determine its usage, timescales and limitations on area required. Thurrock Council would request that these matters of detail are secured via a separate agreement.</p>			
Acquisition Completion Premium	2.1.82	It is noted that on the A66 Trans-Pennine project National Highways has introduced what it calls an Acquisition Completion Premium. This is a scheme whereby those who agree to sell within 12 months of having been advised of the scheme will receive a premium	On the National Highways Project for the A66 Northern Trans-Pennine Route Upgrade, there is a pilot scheme in place offering 20% above market value provided completion on land and property included within the Order Limits is achieved prior to the end of the DCO examination period. This pilot has been put in place to test whether any uplift secures an increased amount of early land purchase to support project delivery costs savings and certainty of delivery. Following successful	N/A	Matter Not Agreed

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		on the land acquisition compensation only of 20%. No similar scheme is proposed on the Lower Thames Crossing – it is unclear on what basis the Acquisition Completion Premium is offered on one National Highways scheme but not this project.	completion of the A66 scheme the findings will be analysed by DfT and HM Treasury to see whether this approach should be offered more widely across the National Highways portfolio.		
Public Open Space	2.1.83	Under s19 of the Acquisition of Land Act 1981 an acquiring authority is in all but a limited number of cases that where the land to be acquired forms 'part of a common, open space or fuel or field garden allotment' that there will be provided as replacement land to fulfil the function of the land acquired and that other land will be of no lesser area and no less advantageous. We see no reasons why this requirement should not apply both in respect of land permanently acquired and that acquired temporarily. Failure in either circumstance would leave the residents of Thurrock	This requirement is also reflected in the Sections 131 and 132 of the Planning Act 2008 which the Project adheres to. Temporary possession of land does not engage the requirements of the Sections 131 and 132 as it does not involve any acquisition of land or rights. An assessment has been undertaken to consider the potential effects of the Project on existing open space, sports and recreational facilities. Where relevant, replacement land will be provided, this is described in detail in Appendix D of the Planning Statement. Further information is provided in the Statement of Reasons and in ES Chapter 13: Population and Human Health Further discussions will be carried out with the Council post application once these documents have been shared.	Statement of Reasons (4.1) Statement of Reasons - Annex C - Land Referencing Methodology (4.1) ES Chapter 13 - Population and Human Health (6.1) Planning Statement Appendix D – Open space and Green Infrastructure Study (7.2)	Matter Under Discussion

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		with less of this particular land type. It is for National Highways to demonstrate, in each instance, the extent to which it meets these criteria.			
Design – Road, Tunnels, Utilities					
A13 Junction; Consideration of alternatives	2.1.84	<p>The Council have concerns that the connectivity provided by the A13 junction results in a number of adverse impacts on regional traffic movements, local traffic flows, local communities and the environment. The proposed arrangement sterilises land within the Borough without assisting connections. The proposals are almost entirely about strategic benefit without supporting local growth, sustainable local access and connectivity, or the transport decarbonisation agenda.</p> <p>The Council do not consider that National Highways have presented enough information on alternative configurations to demonstrate that their proposed configuration is the</p>	<p>National Highways have provided an overview of the design process for the junction of the A13/A1089 . The Project's approach to the design is in accordance with the standards set out in the Design Manual for Roads and Bridges. The design has sought to strike a balance between forming connections with the wider SRN and local road network.</p> <p>During the development of the A13 junction National Highways considered the connectivity needed with at the A13 junction by considering the key traffic movements between the A13, the A1089, and the new connectivity provided by the Lower Thames Crossing. A key consideration during the development of the junction was to minimise the impacts to the local area by making better use of the existing infrastructure.</p> <p>During the development, multiple factors were considered, including the land requirements, impacts on local traffic flows and on the environment, as well as cost. This assessment used professional judgment informed by the traffic model, rather than undertaking a sequence of detailed models of all possible alternatives as proposed by the Council.</p>	N/A	Matter Not Agreed

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		<p>optimal solution. Further detail on specific concerns is set out in the following issues.</p> <p>The Council has presented a number of alternatives to test. Data and findings are just starting to be shared with the Council for review and further work will be needed in the coming months. National Highways has already stated that it has no intention that the scheme will be further amended as a result of the option testing currently underway – even if a more optimum scheme emerges from the work. This approach is inadequate.</p>	<p>As an all-movements junction would have led to significant additional land requirements and environmental impacts, the number of movements provided were reduced, with priority given to those movements that supported the project objectives of providing relief to the Dartford Crossing and approach roads, and supporting sustainable local development and regional economic growth providing regional economic benefit. The junction design was then further developed based on stakeholder feedback, and the design of the A13 junction has since indeed evolved as a result. Following feedback from the Council and others, the A13 junction design has been updated and was consulted on in 2022. National Highways are also currently in discussions with the Council in relation to the merits of consideration of wider network developments that connect the strategic and local road network, such as the Tilbury Link Road.</p> <p>The Project A1089/A13 junction retains all existing movements to/from the A13. In addition, it provides connections from the A1089 northbound to the Project north and south. Depending on the origin and destination of any journey these connections provide more direct links to parts of the strategic road network freeing up other sections.</p> <p>Following feedback, National Highways have made changes to the A13 junction to local road connection to reconnect the Orsett Cock roundabout (A128) to the A1089 southbound. This has resulted in less traffic on local roads.</p>		

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A13 Junction; No consideration of the Tilbury Link Road as part of the alternative configurations	2.1.85	<p>The Council do not support the delivery of the Tilbury Link Road as a separate project to be appropriate. The Council consider that the Tilbury Link Road could provide connections that might enable a different configuration of the A13 junction, reducing the impacts associated with that junction. The Council view this as being an important element of the consideration of alternatives (as stated in paragraph 4.27 the NPSNN) and do not consider the work undertaken by National Highways to be sufficient to demonstrate that their proposals are the optimal scheme.</p> <p>It is the Council's view that the crucial SRN links between LTC, A13 and A1089 could alternatively be made via a junction at Tilbury and the Tilbury Link Road (TLR). This could enable an alternative LTC / A13 / A1089 interchange configuration (potentially removing some A1089 links),</p>	<p>The Tilbury Link Road was not included in the project proposals consulted on at Statutory Consultation because it was not considered necessary to achieve the Transport Scheme Objectives of the Project.</p> <p>The Tilbury Link Road has been identified in the pipeline of projects in the National Highways road investment strategies for 2020-2030 (known as RIS2 and RIS3). During the review of the project undertaken when the Thames Freeport was designated, National Highways sought direction and received instruction from DfT and Department of Levelling Up, Housing and Communities (DLUHC) that the Tilbury Link Road should be delivered through a separate consenting process to the Lower Thames Crossing.</p> <p>National Highways have undertaken a series of modelling exercises to demonstrate the traffic flows associated with the Tilbury Link Road, alongside configurations of the A13 junction agreed in advance with Thurrock Council. National Highways acknowledge the impacts of the proposed layout on the wider road network, but maintain that the currently proposed scheme demonstrates the right approach to deliver against the scheme objectives and to deliver local and regional growth</p>	N/A	Matter Not Agreed

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		reducing its complexity, scale, cost and local community impacts and making the interchange safer. Whilst this option is recognised by National Highways it is the Council's view that alternative options have not been adequately assessed.			
A13 Junction; Connectivity	2.1.86	The Council are concerned that the east-facing connections at the junction with the A13 lead to an increase in traffic in both directions along the A13 and the A130 to the east of the Lower Thames Crossing, removing capacity on the network to support local growth. This also leads to local traffic moving off the A13 onto local roads, at Manorway roundabout and Five Bells roundabout, impacting on local communities.	The east facing connections between the Lower Thames Crossing and the A13 provide important connectivity allowing for areas east of the Project, including London Gateway Port, better access onto the M25 and the M2. Traffic using this route would otherwise use the Dartford Crossing to access the M2, and the A13 and junction 30 to access the M25 northbound. The east facing connections provide for this traffic and so relieve the congested Dartford Crossing and approach roads, supporting the scheme objectives. In addition, the faster journey times will lead to economic benefits at these locations, supporting regional economic growth.	N/A	Matter Not Agreed
A13 Junction; Connectivity	2.1.87	The Council are concerned that the lack of west-facing connections at the junction with the A13 miss an opportunity to provide local	Provision of additional slips at the A13 does not align with the Scheme Objectives as set out in the Need for the Project and furthermore, any additional connectivity puts further demand on local connections. The current arrangement provides the optimum balance of traffic	Need for the Project (7.1)	Matter Not Agreed

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		<p>connectivity, supporting local growth and sustainable local access.</p> <p>There is no proposal to manage the traffic induced on the local road network as a consequence of these absent connections.</p>	<p>using the Dartford Crossing and the Project, whilst minimising impact on the local road network but providing local connectivity where it has the greatest value, such as the additional link from the A1089 onto the Project and the local connections at Orsett Cock.</p>		
A13 Junction; Connectivity	2.1.88	<p>The Council stated a concern that the proposals removed the connection between the Orsett Cock and the A1089 southbound. As a result, traffic from the A128 or from LTC travelling to the Port of Tilbury would need to travel along the A1013, as well as other local roads which are inappropriate for this traffic. The Council acknowledge that this link was reinstated at the Local Refinement consultation, by reconnecting the slip from the A13 westbound to A1089 to connect to Orsett Cock roundabout. However, the Council have concerns that this change increases the pressure on Orsett Cock roundabout, leading to additional traffic moving onto</p>	<p>National Highways acknowledge that there are increases in traffic flows on some local roads, resulting from local road users choosing different routes to access the wider road network once the Project is open to traffic. The modelling demonstrates that in some locations journey times will increase, and in others journey times will decrease. The Economic Appraisal Report sets out the aggregated benefits in Thurrock, considering both faster and slower journeys, and demonstrates the overall economic benefit in this area.</p> <p>The Project's strategic modelling demonstrates that the Orsett Cock junction will operate acceptably, though it is acknowledged that specific concerns have been raised by the Council that are not addressed by the strategic model. As a result, the Project have progressed a local junction model in collaboration with the Council's team to consider these issues. Detailed modelled outputs have been shared with the Council. National Highways considers that this modelling has demonstrated that the junction operates acceptably.</p> <p>The environmental and community impacts associated with the changes in traffic flows are set out in the</p>	<p>ComMA - Appendix D - Economic Appraisal Package (7.7)</p> <p>Environment Statement (Vol 6)</p> <p>Health and Equalities Impact Assessment (7.10)</p> <p>Community Impact Report (7.16)</p>	Matter Not Agreed

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		local roads, and increases the complexity of the interchange, impacting on driver understanding and causing safety concerns. The Council are concerned that the traffic flows through Orsett Cock junction cannot be accommodated without additional works.	Environmental Statement, the Community Impact Report and the HEqIA. National Highways are obligated by their licence to work with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users. National Highways will continue to work with Thurrock Council as they develop their local plan to look at the relationship between the local road network and the strategic road network. In addition, National Highways are considering the potential to trunk the A13 and A1014, separately to the delivery of the Lower Thames Crossing, as set out in the Road Investment Strategy 2.		
A13 Junction; Impacts on local roads	2.1.89	The Council are concerned that Project will result in additional traffic movements across the local road network, both from increased traffic using local roads to access the Lower Thames Crossing, and from vehicles diverting off the A13 to avoid congestion arising from the increased regional traffic. This will lead to adverse impacts on local communities, impacts on local bus services, and restrict local growth. Increased traffic flows across Orsett Cock roundabout will	National Highways acknowledge that there are increases in traffic flows on some local roads, resulting from local road users choosing different routes to access the wider road network once the Scheme is open to traffic. The modelling demonstrates that in some locations journey times will increase, and in others journey times will decrease. The Economic Appraisal Report sets out the aggregated benefits in Thurrock, considering both faster and slower journeys, and demonstrates the overall economic benefit in this area. The Project's strategic modelling demonstrates that the Orsett Cock junction will operate acceptably, though it is acknowledged that specific concerns have been raised by the Council that are not addressed by the strategic model. As a result, the Project have progressed a local junction model in collaboration with the Council's team to consider these issues. National Highways considers that	ComMA - Appendix D - Economic Appraisal Package (7.7) Environment Statement (Vol 6) Health and Equalities Impact Assessment (7.10) Community Impact Report (7.16)	Matter Not Agreed

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		take up the additional capacity delivered by Thurrock Council through the A13 widening project. Delays resulting from the increased traffic will lead to increased flows along a number of roads around the A13 junction, and in addition the increase in traffic on the A13 east of the scheme will result in increased traffic on local roads through Orsett, Corringham and Stanford-le-Hope.	this modelling has demonstrated that the junction operates acceptably. The environmental and community impacts associated with the changes in traffic flows are set out in the Environmental Statement, the Community Impact Report and the HEqIA. National Highways are obligated by their licence to work with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users. National Highways will continue to work with Thurrock Council as they develop their local plan to look at the relationship between the local road network and the strategic road network. In addition, National Highways are considering the potential to trunk the A13 and A1014, separately to the delivery of the Lower Thames Crossing, as set out in the Road Investment Strategy 2.		
Impact of proposed new link on local roads;	2.1.90	The latest LTAM traffic modelling presented by National Highways in the LR consultation material predicts that the proposed Orsett Cock / A1089 Junction Link Road will help to reduce the effects of LTC traffic on A1013 Stanford Road and Brentwood Road, which is welcomed albeit there continues to be an overall increase in traffic flow on A128 Brentwood Road	National Highways are continuing to actively engage with the Council with regards to the forecast impacts of the Project on the road network in Thurrock during operation. This includes microsimulation modelling at key junctions to provide additional assurance alongside the cordons of LTAM and GIS shapefiles. The scope of this work has already been agreed with the authority. National Highways are also regularly meeting with the authority on a fortnightly basis to examine the forecast construction impacts and our proposed measures to reduce these. Detailed reports have been provided setting out how traffic flows are anticipated to change in the area	N/A	Matter Under Discussion

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		<p>which remains unmitigated. There is also an increase in Chadwell Hill through Chadwell St Mary. National Highways should amend the Project, such that traffic flow is not increased on Brentwood Road and if this is not viable, work closely with the council to design and fund traffic mitigation for this area. The effects of these measures need to be tested on A128 Brentwood Road and also on Buckingham Hill Road, Muckingford Road and Fort Road as all of these roads are predicted to see an increase in traffic as a result of the project. These traffic management mitigation measures may result in further traffic using Orsett Cock junction or other routes.</p> <ul style="list-style-type: none"> National Highways must also develop and test the mitigation measures at Marshfoot road, particularly the priority junction on the east side of the A1089. 	<p>providing information that addresses the concerns raised in the traffic survey technical note issued by the Council.</p> <p>National Highways does not consider that any intervention at Marshfoot Road is required.</p> <p>National Highways consider that the information supplied will be beneficial to allow the Council to understand in further detail the impacts of the proposed scheme at the relevant junctions. National Highways acknowledge that Thurrock Council have concerns over the traffic flows at these junctions, and therefore will continue this engagement to ensure that discussions at Examination on these matters can be held on an informed basis.</p>		

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		<ul style="list-style-type: none"> • The increased traffic also raises concerns related to the operational performance of the A1089 Asda Roundabout and micro-simulation should be undertaken. • A negative impact of the proposed new link is to route more traffic through the A13 Orsett Cock junction itself and the consultation doesn't provide any specific information in this. National Highways haven't completed the assessment of this impact and is not presenting the public with this information • The effect of the new link in increasing traffic flows through Orsett village (Rectory Road / Conways Road) is concerning. Whilst it is noted that the overall predicted effect of the 			

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		<p>project will be to reduce flows through the village, the Council remains very concerned about the Project's traffic impacts on Orsett Village during construction and the ongoing risk of rat running through the area once the Project is operational due to potential congestion at the A13 Orsett Cock</p> <p>National Highways must work closely with the Council to design and fund traffic and environmental mitigation measures for this area and it is disappointing that little progress has been made on this issue.</p> <ul style="list-style-type: none"> National Highway's response to a technical note shared in Jan summarising traffic survey data is outstanding 			

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A13 Junction; Ownership and management - Use of local roads to make strategic connections (Orsett Cock roundabout)	2.1.91	<p>The Council consider that the Project makes use of Orsett Cock roundabout, on the local road network, to provide strategic road connections, for example between the Lower Thames Crossing and the A1089. This places an obligation onto Thurrock Council to operate and maintain this junction while it accommodates SRN traffic and reduces the capacity of Orsett Cock roundabout to support future local growth.</p> <p>The Council is concerned that the LTC / A13 / A1089 interchange configuration is using Council roads at the A13 Orsett Cock junction, which is designated as part of the Major Road Network (MRN)) to provide critical SRN to SRN connections.</p> <p>This will be inappropriately reducing the cost of LTC by using this local highway road and junction increasing the future financial burden on the Council, by placing SRN traffic on the Major Road Network</p>	<p>The draft Development Consent Order (Construction and maintenance of new, altered or diverted streets and other structures) sets out the requirements for transfer and ownership of the local roads. It is normal for junctions to be formed from a combination of roads operated by a strategic highways company (i.e. National Highways in England), and another highways authority. In addition, National Highways are considering the potential to trunk the A13 and A1014, separately to the delivery of the Lower Thames Crossing, as set out in the Road Investment Strategy</p> <p>National Highways have considered thoroughly, and discussed with the DfT, the Council's request for a financial payment as compensation in relation to the recent schemes on the A13 and A1014 that were promoted by Thurrock Council and it concluded there are no grounds for a financial compensation payment to be offered. National Highways recognise that this will be a disappointment to the Council, but we do consider that trunking of the A13 will provide significant benefits to the Council.</p> <p>The design of the A13 junction, alongside the rest of the project, has been developed to ensure safe operation. National Highways does not agree that the designs are conceptual in nature, as they are supported by traffic modelling and have been through appropriate reviews including the safety audit.</p>	N/A	Matter Under Discussion

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		<p>(MRN) junction. It will also mean LTC traffic will use up capacity delivered at this junction as part of the recent and expensive A13 highway upgrades to support local growth requirements and aspirations. The Council believes it should be compensated by DfT and a strategy derived by National Highways as to how that reserve capacity would be reintroduced to the network to allow the Council to realise its local growth requirements and aspirations.</p> <p>Changes to A13/Orsett Cock Junction Arrangements - Impacts at Orsett Cock Junction</p> <p>It is inappropriate to repeatedly consult on a scheme that National Highways do not know will operate effectively and has not been assessed fully. National Highways cannot rely on the designs currently considered by the Council to be of a conceptual nature, such that detail</p>			

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		arrangements can be defined through detailed designs. This approach does not confirm the impacts of the project to sufficient detail for the Council to be confident of delivery of the project without significant unmitigated impact and does not effectively assess any 'worst case' through the EIA process.			
Orsett Cock Roundabout Mitigation	2.1.92	It is the view of the Council that additional mitigation is needed to negate the negative impact of the Project upon the junction, including the A128 approach to the junction, signalisation of the A128 arm and possible widening of existing lanes.	National Highways acknowledge that there are adverse impacts on selected local roads but have demonstrated that the benefits from improved traffic flows across Thurrock outweigh the adverse impacts. This is set out in the approach to Wider Network Impacts. National Highways are continuing to actively engage with the Council with regards to the forecast impacts of the Project on the road network in Thurrock during operation. This includes microsimulation modelling at key junctions(including Orsett Cock) to provide additional assurance alongside the cordons of LTAM and GIS shapefiles. National Highways have extended the extent of works to cover Orsett Cock roundabout. This will allow for the signalisation of the A128 arms, both north and south, if it is found that this is required during the detailed design development.	N/A	Matter Under Discussion
A13 Junction; Design	2.1.93	The Council has concerns that the elements of the road network have unsafe design	The Project's approach to the road safety in design is in accordance with the standards set out in the Design Manual for Roads and Bridges. The standard approach	N/A	Matter Not Agreed

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Matters - Safe design of local road links		<p>aspects, including roads that are to be returned to Thurrock Council following completion of the works. The Council has provided information on these concerns to National Highways, but has not been provided with a justification, or been provided with information on any modifications to the design to address the concern. National Highways has effectively concluded that the safety matters raised by the Council are either not of concern or can be mitigated during detailed design. This response is unreasonably dismissive, and it is considered inappropriate to delay resolution for post DCO submission or grant.</p> <p>The Council does concur that, subject to confirmation of the boundary between local and trunk road network, some of the concerns that it has raised in the safety note could only directly affect the SRN. It may be that National Highways' designers have concluded that</p>	<p>set out in DMRB is to undertake a Stage 1 Safety Audit at the preliminary design stage, and a further Stage 2 audit at detailed design. National Highways have undertaken the Stage 1 audit and shared the findings with the Council. This safety audit demonstrated no concerns that needed to be addressed at this design stage. National Highways are satisfied that, based on this safety audit, the highways design is safe. Further consideration will take place at the next stage of design. The safety concerns identified by the Council have been included into the information to be considered in the next stage of design.</p>		

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		there are no concerns at these locations, but that point must be documented and not ignored.			
A13 Junction; Design Matters, Link Capacity	2.1.94	The Council are concerned that the capacity of the link between the LTC off slip to A13 eastbound and to Orsett Cock is insufficient, leading to a lack of resilience and impacting effective management on the network.	<p>The Project's strategic modelling demonstrates that the Orsett Cock junction will operate acceptably, though it is acknowledged that specific concerns have been raised by the Council that are not addressed by the strategic model. As a result, the Project have progressed a local junction model in collaboration with the Council's team to consider these issues. National Highways considers that this modelling has demonstrated that the junction operates acceptably.</p> <p>National Highways recognises that there are other pressures on this junction due to development in the area, and will continue to discuss this with the Council. National Highways have also written to the Council setting out considerations around bringing the A13 in this area into the strategic road network.</p>	N/A	Matter Not Agreed
Spacing of non-emergency stopping areas	2.1.95	The Council request National Highways to confirm if they propose to adhere to the spacing of non-emergency stopping areas within its network, once the Project is constructed and if so, the Council would like confirmation of these spacings.	<p>The Project is designed as an All-Purpose Trunk Road to expressway standards GD 300. GD 300 states that parking lay-bys shall not be provided on expressways (E/8.3). The Project provides emergency areas along its route which are included within the land take.</p> <p>Within the DCO documentation National Highways do not secure a specific distance for the emergency area spacing. The emergency areas are shown on the Engineering Drawings and Sections and the design is required to be undertaken in accordance with these drawings. It is important to recognise that the road will be</p>	Engineering Drawings and Sections (Vol1-3) (2.9)	Matter Under Discussion

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			<p>designed to the safety standards current at the time of construction, and we anticipate that there is sufficient flexibility in the application to be able to accommodate any further developments in this area.</p> <p>Thurrock Council have seen the project position set out above, but seek further details around emergency areas and spacing, which is set out in the Engineering Drawings and Sections. This matter remains under discussion.</p>		
Manorway Roundabout Mitigation	2.1.96	The Council requests additional lane capacity on the A1013 and A1013 approaches (including the Manorway roundabout) to ensure port and local traffic movements are not impaired by the Project.	National Highways are not proposing to undertake any works at the Manorway Junction. The forecast impacts on traffic flows through the Manorway junction, as set out in the ComMA and the Transport Assessment, are considered to be acceptable when reviewed against the policy obligations as set out in the NPSNN. National Highways are currently in discussions with the Council relating to the trunking of the A13.	Combined Modelling and Appraisal Report (7.7) Transport Assessment (7.9)	Matter Under Discussion
Asda Roundabout Enhancement	2.1.97	The Council considers that the requirement for enhancements at the Asda roundabout should be actively examined alongside other delivery highway improvements	<p>Based on the traffic modelling outputs, National Highways do not consider that there are significant changes to traffic flows at Asda roundabout associated with the operation of Project that require any intervention at this location. During the construction works there will be increased traffic through Asda roundabout and measures to manage this additional traffic flow are set out in the Outline Traffic Management Plan for Construction (oTMPfC) and have partly been developed in collaboration with Thurrock Council.</p> <p>Thurrock Council have seen the Project position set out above but are yet to provide feedback.</p>	N/A	Matter Under Discussion

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Passive Provision at Tilbury and Provision of the Tilbury Operational Access Tilbury Operational Access, Options assessment	2.1.98	<p>The provision of a new junction at Tilbury is supported in principle by the Council, if it is accompanied by a commitment to deliver the future Tilbury Link Road (TLR) that it is intended to facilitate. In the absence of this commitment, the junction is over-specified for an operational and emergency access only. Simply provided as an operational and emergency access it is an expensive and unnecessary luxury in the context of the Project as currently proposed. The Project should include provision of both a junction at Tilbury and the TLR to connect LTC to the A1089 and provide multi-modal access to the Tilbury, East Tilbury and potentially Chadwell St Mary Growth Areas.</p> <p>It is the Council's view that National Highways has to date not completed adequate option assessment, traffic modelling and design development work in relation to the Project</p>	<p>The operations and emergency access has not been designed specifically for any particular future connection into the local road network, however if the Local Authority or a third-party stakeholder is considering any future development they would need to liaise with National Highways Spatial Planning to develop their proposals. The operations and emergency access have been designed to standard and all gradients, loops and distance from the tunnel portal, have met the relevant requirements.</p> <p>The Tilbury Link Road was not included in the project proposals consulted on at Statutory Consultation because it was not considered necessary to achieve the Transport Scheme Objectives of the Project.</p> <p>The Tilbury Link Road has been identified in the pipeline of projects in the National Highways road investment strategies for 2020-2030 (known as RIS2 and RIS3). During the review of the project undertaken when the Thames Freeport was designated, National Highways sought direction and received instruction from DfT and Department of Levelling Up, Housing and Communities (DLUHC) that the Tilbury Link Road should be delivered through a separate consenting process to the Lower Thames Crossing.</p> <p>The appraisal of alternative configurations of the Project is covered by issue 2.1.66.</p>	N/A	Matter Not Agreed

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		overall, at the A13 Orsett Cock junction or at the proposed Tilbury junction to enable it to make fully informed judgements and comments on this latest proposal. The Council expects National Highways to demonstrate that the proposed junction design will provide the vital capacity, connectivity, configuration and operational performance required to accommodate future traffic, public transport and walking, cycling and horse-riding (WCH) movement demands arising as a result of the proposed project configuration with a TLR in place and with local growth aspirations for the area (e.g. Thames Freeport expansion and the Thurrock emerging Local Plan)			
Tilbury Operational Access, Design	2.1.99	The Council has a number of concerns related to the half-clover leaf junction configuration and design as currently proposed which requires further evidence to be	This is an operations and emergency access and not a junction opens to the public. The operations and emergency access has not been designed specifically for any particular future connection into the local road network, however if the Local Authority or a third-party stakeholder is considering any future development they would need to liaise with National Highways Spatial	The Structures Plans (2.13)	Matter Not Agreed

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		<p>provided by National Highways covering:</p> <ul style="list-style-type: none"> • junction design options assessment; evidence of why this configuration has been proposed, and other alternatives discounted • junction design capacity and standards; National Highways should confirm the overall capacity constraints associated with this configuration (and associated National Highways design standards), especially the merge/diverge arrangements between slip roads • provision of a future East Tilbury link; National Highways to demonstrate that this design can accommodate a future link eastward the East Tilbury Growth Area 	<p>Planning to develop their proposals. The issues highlighted by Thurrock Council, including the necessary details around design and capacity, need to be considered by the promoter of the subsequent development proposals.</p> <p>The suitability of the access to provide connectivity for specific aspects, such as the provision of an East Tilbury link, will have to be considered as those proposals are developed. The provision of capacity on the bridge structure is set out in the Structures Plans.</p>		

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		<ul style="list-style-type: none"> the ability to accommodate future public transport and active travel i.e. National Highways should demonstrate sufficient width and space has been provided at the junction and on the new bridge structure to facilitate the creation of high quality public transport and active travel corridor. The added widths should allow for a minimum of 3.5m bus lane in each direction across the bridge and for a 5.0m segregated path pedestrian and cycle path 			
Landscaping Changes at A13 Junction and North Road	2.1.100	The Council wishes to have details of the proposed planting mix prior to DCO submission to be confident that it is likely to succeed on these steep earthworks.	National Highways confirms these details will be made available as part of the updated oLEMP, submitted as part of the updated DCO application. Further discussions will be carried out with the Council post application once this document has been shared.	Outline Landscape and Environment Management Plan (oLEMP) (6.7)	Matter Under Discussion

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Tilbury Fields Design Principles and Plan Additional information required for Tilbury Fields	2.1.101	<p>The final design of the public open space provision and facilities have yet to be prepared and will not form part of the DCO, however, the Council requires additional Design Principles and an 'Indicative Plan' to be prepared, so that the design of Tilbury Fields is both constrained, controlled and delivered as discussed to the appropriate standard and agreed with the Council. In particular, these should include the layout, route of all the WCHs, surfacing palette and ecological finish and details of any structure/building</p> <p>The Council requests the following additional information</p> <ol style="list-style-type: none"> 1. The alternatives options appraisal to demonstrate that the currently proposed site is appropriate and why the East Tilbury Landfill area was not included to lower landform levels. 2. Sections and visualisations showing how the new earthworks will appear from 	<p>Design Principles and Plan</p> <p>National Highways has developed a design principle for Tilbury Fields; and this is included in the DCO submission. There is also a separate design principle for the tunnel service building and portal. The plan for the area and the ecological finish is covered by the Environmental Masterplan and the General Arrangement drawings. All walking, cycling and equestrian routes will be designed in accordance with the latest standards and guidance with a surface appropriate for its intended use. Design Principle (DP PEO.03) requires that surfacing needs to balance design quality and practicality, within the context of the local environment. Further details of surfacing materials will be developed at detailed design.</p> <p>Additional Information requested by Thurrock Council</p> <ol style="list-style-type: none"> 1. East Tilbury Landfill is a much larger area of land than is needed to replace the land relinquished for the Thames Freeport Development. The Environment Agency has strongly advised against any activities on the landfill site that could result in the mobilisation of contaminants from within the landfill into the chalk aquifer, this particularly includes land raising/any form of ground disturbance and is therefore not compatible with our vision for Tilbury Fields and the creation of placemaking earthworks. In addition, ecology surveys have identified the East Tilbury Landfill as an important site for invertebrates, reptiles and ground nesting birds. This area is a valuable ecological habitat and by retaining it in its current form and linking it to our areas of mitigation to the west and east we are creating a strong 	<p>Design Principles (7.5) ES Figure 2.4 - Environmental Masterplan (6.2) Rights of Way & Access Plans (2.7) ES Chapter 5 – Air Quality (6.1) ES Chapter 12 – Noise and Vibration (6.1) General Arrangements (2.5)</p>	Matter Under Discussion

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		<p>Coalhouse Fort in context with intervening East Tilbury Landfill to better understand its visual effects on this sensitive heritage site</p> <p>3. More details of the emerging design, including habitat features and their future management prior to DCO submission</p> <p>4. A horse-riding route connecting the Two Forts Way to FP200 is included as part of the Project</p> <p>5. The network of paths would improve recreational connectivity between the river and three Scheduled Monuments. However, the Council do require further details of the proposed designations of these WCH</p> <p>6. Information on how would National Highways look to strategically link this new park to existing footpaths and other open spaces locally? 7. Updated noise and air quality impact assessments demonstrating how the</p>	<p>connection of valuable ecological habitats along the northern side of the Thames. For these reasons, we have discounted the use of this area from our Tilbury Fields proposal.</p> <p>2. The visualisation exercise is ongoing and will be presented to the Council when complete (this additional visualisation is being developed to support discussions on the proposals and is separate to the provision of assessment information within the Environmental Statement) Further discussions to agree appropriate section profiles will take place shortly.</p> <p>3. More details of the emerging design, including habitat features and their future management is presented in the oLEMP and will thus be available for the Councils review following application.</p> <p>4. The northern Portal is located within East Tilbury Marshes and would not result in any severance to walkers, cyclist or horse-riders within the Tilbury Fields area, given it does not cross any existing Public Rights of Ways. Although there is no specific impact to mitigate in this area, we are proposing WCH routes as an enhancement within this area with the aim of creating walks that link the heritage assets in areas such as Coalhouse Fort, East Tilbury Battery and Bowater Battery. This will be achieved by linking Two Forts Way and the proposed country park at Tilbury Fields to the improved PRoW network further north.</p> <p>To provide public access through the country park at Tilbury Fields, we are proposing two north-south routes. These routes will connect to the FP200, proposed to be realigned and redesignated as bridleway, to Two Forts</p>		

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		proximity to the highway affects Tilbury Fields.	<p>Way along the shoreline of the Thames, where we propose to resurface, widened and redesignate the footpath to a pedestrian-cycle track in readiness for similar future improvements (by others) to the west and east. The western of these routes will be designated as a permissive footpath and will follow the newly created topography to bring users to these new viewing points. The eastern route will follow an historic watercourse through the marshes and will be designated as a footpath. There will be two permissive paths linking these primary north-south paths. The proposed WCH routes are considered to provide valuable improvements to the exiting PRow network and helping Thurrock with their aspirations to improve public access. There may be an opportunity in the future for the eastern footway through Tilbury Fields to be upgraded to bridleway/ped-cycle route by the same third parties as the eastern works to Two Forts Way in order to create a complete loop from Coalhouse Fort but it is not considered appropriate to prejudice those proposals, or incorporate them as part of the LTC.</p> <p>5. This information has already been presented as part of the Interactive Map at LRCON, which included a legend of the proposed designations of these WCH routes. This information is also presented in the Book of Plans in the DCO submission.</p> <p>6. Public Rights of Way through this area are set out in the Rights of Way and Access Plans (Application Document 2.7).</p> <p>7. The updated air quality and noise impact assessment demonstrating how the proximity to the highway affects</p>		

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			<p>sensitive receptors near Tilbury Fields is included in Chapters 5 and 12 of the ES.</p> <p>National Highways have discussed the design approach in this area during design development and set out the proposals at the Local Refinement Consultation. Further discussions will be carried out with the Council once the Design Principles document has been shared.</p>		
Design of Tilbury Viaduct	2.1.102	National Highways should classify the Tilbury Viaduct as a Project Enhanced Structure and provide a justification on if this is not the case. If the viaduct is not an 'enhanced design structure' it could worsen the environment for the population in this area. There are direct views from the West Tilbury Conservation Area onto Tilbury Viaduct.	<p>National Highways responded in detail to this request in October 2020 and 8th April 2022.</p> <p>Project Enhanced Structures</p> <p>The full design rationale for 'Project Enhanced Structures' is found in our Project Design report. National Highways have sought to secure additional commitments within our Design Principles document to ensure that the Preliminary Design presented at DCO is carried through to detailed design and implementation. There are Design Principles for all structures across the project, with the aim of ensuring the designs:</p> <ul style="list-style-type: none"> • Use a complementary and consistent material palette; • Are well detailed and coordinated; • Are integrated sensitively and seamlessly into the landscape. • The Tilbury viaduct has not been included as a 'Project Enhanced Structure' for the following reasons: • It is already taller than the Mardyke Viaduct relative to the surrounding ground level, giving it 	Design Principles (7.5) Project Design Report Part C Design Rationale (7.4)	Matter Not Agreed

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			<p>better proportions and greater clearance for views under and through it;</p> <ul style="list-style-type: none"> In terms of long views, the landscape is less open with more woodland areas trees and hedge lines breaking up views. Through the landscape design, the existing wooded ridge would be strengthened with new tree planting, which (once mature) will effectively screen and integrate the viaduct on both sides; The existing landscape already has a number of urbanising structures like the Overhead Line Electrification associated with the Tilbury Loop railway and in particular, parallel lines of pylons on a north-south axis. <p>As a result of these factors it was felt that a good, but more standard approach would be appropriate here.</p>		
Configuration and Surfacing Materials for WCH routes Tilbury Green	2.1.103	<p>The Council would like National Highways to set out;</p> <p>1. Surfacing materials for WCH routes (e.g. FP200). These should be agreed with the Council as Highways Authority responsible for their future upkeep. While materials should be hard wearing their environmental impacts should also be considered.</p> <p>2. Configuration of the WCH routes; e.g. safety (lighting and fencing), widths, subdivisions</p>	<p>1. All walking, cycling and equestrian routes will be designed in accordance with the latest standards and guidance with a surface appropriate for its intended use. Design Principle DP PEO.03 requires that surfacing needs to balance design quality and practicality, within the context of the local environment. Further details of surfacing materials will be developed at detailed design.</p> <p>2. Configurations of the WCH routes are also a matter for detailed design. At this stage, National Highways have provided an appropriate framework of design principles for the detailed design to be based on. Design Principle DP PEO.04 list out the WCH detailed design standards.</p> <p>3. The current wording of PEO.01 has been amended to: <i>'All PRowS crossing the Project route shall have a</i></p>	<p>Design Principles (7.5)</p> <p>Rights of Way & Access Plans (2.7)</p>	Matter Under Discussion

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		<p>between bound and unbound surfaces etc.</p> <p>3. Wording of PEO.01 is too vague. How do National Highways propose to provide convenient and safe PRowS?</p> <p>Tilbury Green is in effect Footpath 200 and the proposed route is acceptable. However, no detail has been provided regarding its width and design (e.g. will it be enclosed by hedges?).</p>	<p><i>detailed design that is safe and considers the convenience of the users and appropriateness to the context of the adjacent landscape character, with changes in level minimised where appropriate'</i></p> <p>FP200 has been upgraded to a Bridleway and detail has been provided regarding its detailed design in DP PEO.04</p> <p>The Council have seen the Project position set out above, but are yet to provide feedback and thus the matter remains under discussion.</p>		
<p>Adequate space for wetland habitat</p> <p>Adequate space within Order Limits</p>	2.1.104	<p>The Council disagree with the National Highways proposal for new wetland habitat close to the alignment as it does not meet the Council's or the environmental organisations' aspirations to recreate more extensive areas. Further flood storage should be provided that delivers landscape and ecological mitigation.</p> <p>The Council would like to investigate the space within Order Limits to deliver</p> <p>1. Additional landscaping around earthworks referred to at Design Principle LSP.03.</p>	<p>The Project has provided adequate and appropriate flood storage, landscaping and ecological mitigation as required by a scheme of this size and nature. Over provision would need additional spend of public funds and would require separate justification. There are no proposals to provide any further flood storage as part of the Project.</p> <p>1. The Design Principle - LSP.03 Landscape integration features for visual screening</p> <p>The current landscape design proposals have been developed and designed to align with this Project-wide Design Principle; there is adequate space within the Order Limits. However, the landscape design itself will be further developed during the detailed design, in line with the controls and commitments of the DCO documents. There is no requirement to obtain additional land as the</p>	Design Principles (7.5)	Matter Agreed, subject to review of DCO documents

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		<p>2. Enhanced green infrastructure and access referred to at Design Principle LSP.06</p> <p>The boundary of the project is tight, which limits its capacity to accommodate enhanced green infrastructure and access within the Order Limits and secure it appropriately. If the current Order Limits constrain the achievement of the above, they should be extended.</p>	<p>current landscape design proposals are compliant with the design principle.</p> <p>2. The Design Principle - LSP.06 Landscape legacy</p> <p>Where large-scale landscape mitigation is required, the design of this shall be developed to maximise the Project's legacy for local communities, landowners, whilst considering existing land use. Where compatible with mitigation proposals the Project shall provide, within the Order Limits, enhanced access, amenities and green infrastructure. Where there is alignment between the Project and other existing or planned green infrastructure, schemes identified by local authorities and other relevant stakeholders, the Project's detailed design will be developed to integrate with the delivery of green infrastructure by others. The current Project Order Limits do not constrain the achievement to Design Principle LSP.06, which is a Project-wide Design Principle.</p> <p>Thurrock Council are agreed in principle with the position set out above, but would like to review the DCO documents before formally agreeing this matter. This matter remain under discussion until these have been reviewed post application.</p>		
Provision of internet and 5G cables	2.1.105	National Highways should utilise the construction phase of the Project as an opportunity to lay down internet and 5G cables within the alignment and make provision on all bridges and tunnels, as appropriate.	<p>National Highways is committed to using the construction phase to lay down provisions for internet and 5g cables within the alignment and make appropriate provisions on its structures. The following commitment was added to the Design Principles document (STR.14)</p> <p><i>The following new bridge structures shall include spare ducts to provide for all necessary communications infrastructure by others, providing sufficient capacity to</i></p>	Design Principles (7.5)	Matter Agreed*

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			<p><i>meet both current and likely future fibre, phone and cabling needs:</i></p> <ul style="list-style-type: none"> • <i>Muckingford Road</i> • <i>Brentwood Road</i> • <i>A1013 over A1089 overbridge</i> <p><i>A1013 over A122 Lower Thames Crossing overbridge</i></p> <ul style="list-style-type: none"> • <i>Rectory Road overbridge</i> • <i>Stiffords Clay Road over A122 Lower Thames Crossing overbridge</i> <p><i>Stifford Clays Road over A122 Lower Thames Crossing northbound overbridge</i></p> <ul style="list-style-type: none"> • <i>Farm track and footpath 136</i> • <i>Green Lane bridge</i> • <i>North Road bridge</i> • <i>Brewers Road green bridge</i> • <i>Thong Lane green bridge south</i> • <i>Thong Lane green bridge north</i> <p>Thurrock Council have seen the Project position set out above and marked the matter agreed.</p>		
Provision of low-noise road surfacing	2.1.106	National Highways should use low-noise road surfacing on the Project and the local network.	<p>National Highways is committed to the use of low-noise surfacing on the Project and local network and the commitment is included in the REAC under NV013.</p> <ul style="list-style-type: none"> • <i>For the locations identified on ES Figure 12.6, a surfacing system that has a reported noise Road Surface Influence (RSIH) of -7.5dB(A) or better in accordance with the Highway Authorities Product</i> 	'Code of Construction Practice including the Register for Environmental Actions and	Matter Agreed*

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			<p><i>Approval Scheme certification system shall be installed.</i></p> <ul style="list-style-type: none"> <i>For the locations identified on ES Figure 12.7, a 'Level 3' (i.e. RSIH -3.5 dB(A) or better), very quiet surfacing material, as defined by Manual of Contract Documents for Highway Works Volume 1 - Specification for Highway Works, Series 0900, Table 9-17, shall be installed on all other new and altered trunk roads and associated slip roads forming part of the Project.</i> <i>For the locations identified on ES Figure 12.7, a 'Level 2' (i.e. RSIH -2.5dB(A) or better), quieter than Hot Rolled Asphalt surfacing material, as defined by Manual of Contract Documents for Highway Works Volume 1 - Specification for Highway Works, Series 0900, Table 9-17, shall be installed on all new and altered local roads forming part of the Project.</i> <p>Thurrock Council have seen the Project position set out above and marked the matter agreed.</p>	Commitments (6.3)	
Construction					
Phasing of construction activities	2.1.107	The Project should ensure the construction operations cause the minimum level of disruption by phasing activities.	<p>The commitment to share phasing plans (post consent, if the project is consented to) for information is included in the Code of Construction Practice (CoCP) including the Register of Environmental Actions and Commitments (REAC)</p> <p><i>'..ensure construction phasing plans have been made available to the relevant Local Authorities for information, prior to works commencing in that phase'.</i></p>	'Code of Construction Practice including the Register for Environmental Actions and	Matter Agreed*

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			The Project is also committed to a Joint Operations Forum, secured by the CoCP. The Joint Operations Forum would enable collaborative working to ensure coordination of construction phasing and logistics, and make sure the Contractors' construction programmes are aligned. Thurrock Council have seen the commitments set out above and marked the matter agreed.	Commitments (6.3)	
Ensuring minimum level of disruption during construction	2.1.108	The Project should ensure the construction operations cause the minimum level of disruption by locating compound sites away from properties and sensitive receptors.	<p>The commitment to sharing site layouts for information is included in the CoCP</p> <p><i>'Site layouts for construction compounds will be made available to the relevant local authority for information, prior to works commencing in that phase.'</i></p> <p>The Project is also committed to a range of measures included in the REAC (LV006-LV027) all around location and layout of construction compounds, heights of bunds and stockpiles and minimising disruption to properties and sensitive receptors. Thurrock Council have seen the commitments set out above and marked the matter agreed.</p>	'Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)	Matter Agreed*
Working Hours	2.1.109	The Project should minimise the level of disruption by only applying appropriate on-site working hours.	<p>The Project is committed to minimising the level of disruption for local communities by striking a balance between progressing the construction in a timely fashion to minimise overall impact and site working hours. The following commitment is included in the CoCP</p> <ul style="list-style-type: none"> • <i>Earthworks will be executed during core hours, with option retained to extend to 22.00 outside of identified impacted zones.</i> • <i>Impact zones will be identified, where receptors are within 300m of the Order limits – those zones</i> 	'Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)	Matter Agreed*

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			<p><i>will be restricted to core hours working. The opportunity to extend to 22.00, within impact zones, will only be taken where the Project can determine methodology that enables Earthworks, within those zones, may be carried out provided that noise levels are no greater than the levels recorded during pre-construction monitoring. Works undertaken in impact zones will be included, prior to undertaking the works, in the application made by the Contractor to the relevant local authority under Section 61 of the Control of Pollution Act 1974 unless appealed.</i></p> <p>Thurrock Council have seen the commitments set out above and marked the matter agreed.</p>		
Use of Port Facilities to transport construction materials	2.1.110	National Highways should make firm commitments as to the type and amount of material that can be transported by marine transport including via Port of Tilbury and Tilbury2. At present whilst contractors are apparently encouraged to investigate this further as part of their MHPs and TMPs there is no firm commitment to do so and contractors will opt for the easiest and cheapest option. The oMHP must form a robust framework in which stretching targets around the movement	National Highways recognises the opportunity that the use of the river for material transportation presents for reducing impacts of vehicle movements. As such, subject to the exceptions set out in the Outline Materials Handling Plan (oMHP), the Project shall utilise port facilities for at least 80% by weight of bulk aggregates imported to the North Portal Construction Area (the Baseline Commitment). This commitment translates into 35% of the total bulk aggregates across the Project being transported via port facilities. In addition, and subject to the exceptions set out in the oMHP, the Contractor will engage with aggregate and material suppliers collaboratively, to proactively maximise utilisation of river transport for the import of sand and aggregates for the North Portal Construction Area beyond the Baseline Commitment so far as is reasonably practicable.	Code of Construction Practice (CoCP) Annex B - Outline Materials Handling Plan (oMHP) (6.3)	Matter Under Discussion

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		<p>and handling of materials which will bring about reductions in the environmental impacts of moving and handling that material. The targets should be minima which the contractors adopt within their developed Materials Handling Plans and that they are incentivised to exceed those targets.</p> <p>National Highways have offered a commitment and Thurrock Council have made formal comments summarised as follows:</p> <p>1. National Highways should extend its commitments to moving materials, plant and equipment associated with the delivery of the project beyond the current commitment relating solely to 35% of bulk aggregates and revisit the wording such that it is specifically expressed that movement must be by non-road transport. Specifically, it is noted that concrete will be batched on site and also tunnel segments cast on site.</p>	<p>Further details of this commitment are set out in the oMHP.</p> <p>The purpose of this commitment is to:</p> <ul style="list-style-type: none"> • reduce the number and length of construction-related transport movements; and • reduce the potential social and environmental impacts arising from construction-related import of materials associated with the Project <p>National Highways understand that Thurrock Council would like this commitment to be extended, National Highways have provided responses to the Council's suggestions..</p>		

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		<p>How will concrete aggregate be delivered to the site for preparation/batching?</p> <p>2. National Highways should commit to move other materials, plant and equipment by marine and rail.</p> <p>3. National Highways should set out the justification for exclusion of any material, plant or equipment that is dismissed by National Highways within the oMHP.</p> <p>4. National Highways should indicate how road safety and reductions in transport-based carbon has been taken into account for road-based transport.</p> <p>5. National Highways should establish a process within the oMHP by which contractors would apply for a derogation from the contracted commitments, if required. That process should allow suitable notification, review and approval between National Highways, the contractor and the Council. The process should be designed by</p>			

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		<p>National Highways to incentivise the contractor to pursue movements by non-road-based transport except in exceptional circumstances.</p> <p>6. National Highways should confirm why the existing jetties are not available or appropriate to the project and how alternative marine and rail facilities would be used or created.</p>			
Number and type of vehicle movement	2.1.111	<p>No evidence has been provided to support the assessment of the number of on-line vehicle movements identified and the assessment appears to use different vehicle capacities for the waste removed from the North of the river to that removed from the South of the river with no justification for this difference.</p> <p>1. There is no clarity as to the numbers and type of movements associated with materials handling and</p> <p>2. There is no cap on movements from the project in total or from any defined</p>	<p>The assessment for the number of vehicles is based on the scale and magnitude of vehicle movements and is developed from the volume of materials associated with the scheme design. The variance in vehicle capacities is dependent whether the movement is online or offline. For movements online a vehicle capacity of 8.5m³ based on a 20ton HGV has been used. For offline movements a vehicle capacity of 17m³ based on a 40ton articulated dump truck has been used.</p> <p>The forecasted truck movements have been used to support the construction traffic modelling, this includes earthwork movements using the network to transport material. The impact of the construction traffic is detailed in Transport Assessment Chapter 8, and appropriate mitigation measures are presented within the EIA.</p> <p>The movement of construction vehicles from compounds and ULHs has not be restricted by a vehicle cap, but rather the impact it has on the road network. The</p>	Transport Assessment (7.9)	Matter Under Discussion

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		compound, including the utilities logistics hubs.	appointed contractor would be required to manage deliveries to compounds using vehicle booking systems. In addition monitoring of vehicle movements to and from compounds to promote improvements in road safety and to minimise LTC construction traffic and environmental impacts on the road network and local communities. The MWCs will set out their co-ordinated monitoring proposals in their Traffic Management Plans. This matter is currently under discussion.		
Receiving wastes	2.1.112	No information on the receiving sites has been identified to provide comfort that they will be able to accept the wastes generated at the point that they are exported from the site. There is a lack of detail on the sites receiving the wastes to provide confidence that they are suitably licensed or have sufficient capacity to receive the wastes generated at the point that they are produced. It is not possible to align the facilities identified within Appendix B the oMHP with those considered within the Excavated Materials Assessment (EMA) within the ES, making it impossible to assess the surrounding	A list of existing third-party waste management facilities within Essex, Kent and the East London Waste Authority study area is provided in the appendices of ES Chapter 11: Materials Assets and Waste. All the sites listed in List of third-party off-site waste infrastructure receptors have been taken from the Environment Agency datasets and are appropriately permitted to accept the anticipated wastes generated by the Project. This demonstrates the variety of facilities available to the Project. The final selection of the receiver sites for surplus excavated materials would be carried out by the contractor using the screening criteria presented in the Excavated Materials Assessment. The ES Chapter 11: Materials Assets and Waste provides an assessment of likely significant effects of Project wastes on waste management facilities within the study area, defined as Essex, Kent and East London Waste Authority and in line with the requirements of DMRB LA 110. The assessment presents the baseline capacity of landfill and other waste management facilities within the study area.	Code of Construction Practice (CoCP) Annex B - Outline Materials Handling Plan (oMHP) (6.3) ES Chapter 11 - Materials Assets and Waste (6.3) Excavated Materials Assessment (EMA) (ES Appendix 11.1) (6.3) List of third party off-site	Matter Under Discussion

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		capacities and potential for the management of the material arising from the site.	The appointed Contractor will manage waste during the construction period and typically they would look to use local (sub-regional) waste infrastructure wherever feasible to minimise the environmental impact and cost of transport, and support the economic well-being of local communities. Procurement rules mean that it is not possible to prescribe specific waste management facilities to be used during construction of the proposed scheme, and these rules prevent setting a precedent that would potentially tie the appointed Contractor to exclusive arrangements with specific waste management facilities. The ability to use waste management infrastructure from a wide range of locations would allow existing waste management capacity to be used effectively and efficiently, without resulting in local overcapacity to the detriment of the local economy. This matter is currently under discussion.	waste infrastructure receptors (ES Appendix 11.1) (6.3)	
Excavated Material Assessment	2.1.113	The Excavated Material Assessment report provided states that waste classification of the soils (as either Hazardous or Non-Hazardous) will be undertaken once ground investigation is complete. Without this fundamental assessment we do not understand the origin of the quantities used in this oMHP.	Information on the classification of the excavated materials (inert, non-hazardous and hazardous) is provided within the Excavated Materials Assessment (EMA) and within the outline Materials Handling Plan (oMHP). The preliminary Ground Investigation works carried out has been used to determine suitability of excavated material for construction. This has supported the earthwork quantities assessment detailed in the oMHP. As part of the oMHP the appointed contractor would conduct further testing to ensure suitability of material as and when required.	Excavated Materials Assessment (EMA) (ES Appendix 11.1) (6.3) Code of Construction Practice (CoCP) Annex B - Outline Materials	Matter Under Discussion

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			National Highways have shared detailed documentation and undertaken a number of discussions on these matters. Further discussions will be carried out with the Council post application once these documents have been shared.	Handling Plan (oMHP) (6.3)	
Use of clean excavated material and associated impacts	2.1.114	Clean excavated material is proposed to be re-used onsite to reduce the need for vehicles to transport the waste material offsite for disposal. All the clean material would be used to provide new landscaping features and could reduce truck movements on local roads. This would likely have a positive health, equalities and wellbeing effect to physical and environmental health through a reduction in congestion and resultant air and noise pollution. National Highways must, however, commit and incentivise its contractors to meet this proposal whilst also investigating how to further reduce the movement of all materials, plant and equipment – particularly by road. Furthermore, control measures are needed to ensure that if	<p>National Highways acknowledge the positive comments made by Thurrock Council for re use of clean excavated wastes.</p> <p>The oMHP sets out the approach and high- level principles for handling construction materials and waste on the Project, both inside and outside the Order Limits. Consideration of multimodal transport options including the use of rail and river to minimise road miles, where reasonably practicable, and the utilisation of internal haul routes are key considerations.</p> <p>Material quantities and the assumptions to reuse materials identified in the oMHP are based on the geological data available. Contractors will be required to realise opportunities for reuse etc for the benefit of the Project. The oMHP provides the high-level principles in handling this material, however, if consented, the detailed post consent Materials Handling Plans will provide a robust plan to ensure materials are reused where feasible. However, there are also other additional commitments which should be considered E.g. the Project is now committed to use the port facilities for transporting 80% of bulk aggregates to the North Portal Construction Area (baseline commitment) for the tunnel construction project. There is also a 'better than baseline' commitment (80%) in the oMHP whereby the Contractor</p>	Code of Construction Practice (CoCP) Annex B - Outline Materials Handling Plan (oMHP) (6.3) Health and Equalities Impact Assessment (HEqIA) (7.10)	Matter Under Discussion

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		<p>material is not deemed suitable for use within the Order Limits that the contractor must stick to committed limits of movement of material.</p> <p>During construction of the proposed landforms there is the potential for construction noise effects to local receptors, such as the residential areas of East and West Tilbury. However, although these would be temporary it would be experienced over a 6-8-year period - therefore, for people in later life the impacts could result in a permanent erosion of the quality of their remaining life.</p>	<p>would engage with aggregate and material suppliers collaboratively, to proactively maximise utilisation of river transport for material import of bulk aggregates. The contractor is required to adhere to all commitments made in the oMHP.</p> <p>National Highways is committed to complying with the principles and commitments in the oMHP and developing detailed Material Handling Plans, as required by the oMHP. These will be developed post DCO consent, in line with the controls and commitments of the oMHP and in consultation with local authorities including Thurrock Council.</p> <p>Thurrock Council's comments on impacts of construction noise are noted. The HEqIA takes into account the duration of impacts as part of the assessment, rather than whether or not impacts are described as permanent or temporary. Impacts are classified according to whether they are short, medium or long-term, with long-term impacts relating to those which may last for more than two years in duration. This helps to describe where impacts may have a different effect on particular sensitive populations, notably older people and children in particular.</p> <p>Further discussions will be carried out with the Council post application once the finalised version of these documents have been shared.</p>		
Removal of tunnel materials	2.1.115	The Council would like confirmation of the route for the removal of the Tunnel Boring Machines (TBM); if	The Project has committed to a target for use of port facilities for bulk aggregates. These targets are now contained in the oMHP. TBM removal methodology and route will be selected by the Contractor but will be in	Code of Construction Practice (CoCP) Annex	Matter Under Discussion

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		these are to be brought back from the north portal, then there must be commitments to its removal using marine transport from PoT/PoT2.	accordance with the restrictions of the DCO. National Highways has responded to the Thurrock Council position on this.	B - Outline Materials Handling Plan (oMHP) (6.3)	
Safety and efficiency in construction logistics management and fleet operation	2.1.116	The Council expects a clear commitment by National Highways (inc their contractors and sub-contractors) to operate to the Construction Logistics and Community Safety Standard (CLOCS) and Fleet Operator Recognition System (FORS) Silver Standard with progression to Gold.	<p>The National Highways commitment to use CLOCS and FORS are detailed in the CoCP, chapter 6 and presented below.</p> <p><i>The Contractors will inform National Highways what their strategy is for implementing FORS Gold, or equivalent by assessment, where applicable, along with supporting their supply chain to gain FORS Silver or above Equivalency, by assessment, is intended to open opportunity for local businesses who would otherwise be excluded due to an absolute requirement to achieve FORS accreditation which may be onerous to small businesses.</i></p> <p><i>National Highways will monitor performance against compliance with FORS progression and publish results as part of the project performance reporting to the Traffic Management Forum (TMF). Strategies to address non-compliance will need to be prepared by the Main Works Contractors and utility contractors to be presented and agreed at the TMF.</i></p> <p>Thurrock Council have seen the commitments set out above but are yet to provide feedback.</p>	Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)	Matter Under Discussion
Asset Management and	2.1.117	The Council has concerns around maintenance of its road network during construction works. National Highways	National Highways provided further information on road maintenance and rat running issues in a presentation to Thurrock Council in May 2022, which outlined the project position on these matters and next steps. National	N/A	Matter Under Discussion

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Maintenance		need to outline and secure its proposals for preventing damage on local roads and how these will be rectified. A regime of regular inspections and intervention needs to be recognised and set out in the oTMPfC and the resources needed should be covered by a s106 or a suitable agreement.	Highways recognise the need for providing support to the local authority on these matters. As a consequence, National Highways have set up a working group to discuss issues of road maintenance and rat running in detail with Thurrock Council, and further workshops and site visits are planned. As specific interventions are identified and agreed, National Highways will work with Thurrock Council to formulate suitable agreements to fund these works.		
Designated Access Routes	2.1.118	Thurrock Council require further detail on how the designated construction access routes would be managed/ enforced and the consequences of non-compliance.	Access routes are presented in the Outline Traffic Management Plan for Construction (oTMPfC). Further details on management of access and egress routes from compounds will be developed when the Traffic Management Plans (TMPs) are produced, post consent (if consented), in line with the controls and commitments on the oTMPfC. Thurrock Council is a consultee to the production of this document. Enforcement of non-compliance is a matter of contract between National Highways and its contractors. National Highways have undertaken a series of engagement sessions and shared wordings for inclusion into the oTMPfC. Further discussions will be carried out with the Council post application once the finalised oTMPfC document has been shared.	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion
Construction of haul routes in alignment	2.1.119	The Council would like National Highways to construct any elements of the proposed haul road that will fall within the	National Highways are actively investing in developing the Tilbury Link Road, which is outside the scope of the DCO application for the Project. The opportunity of using the haul road construction requirements to lower the	N/A	Matter Under Discussion

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with emerging Tilbury Link Road (TLR) alignment		general alignment of the TLR alignment to a standard to support the subsequent delivery of the TLR.	future scope of works for Tilbury Link Road is recognised by National Highways. However, until such time as a preferred route for the Tilbury Link Road is determined, it is not possible for National Highways to commit to this request, as the identified preferred route may not align with either the requirements of the haul road, or the powers obtained within the DCO.		
Local construction traffic impacts	2.1.120	Thurrock Council have set out their concerns on the construction traffic impacts at 39 locations and have produced a comprehensive consideration of our concerns and requirements. National Highways have engaged collaboratively on a review of these concerns, and this work is ongoing. Thurrock Council expect these discussions to continue, and to see further outcomes committed to and secured within the control documents. National Highways should undertake detailed traffic assessments where there is significant impact on the Local Road Network (e.g. junction capacity assessments, shuttle working/contra flow/temporary signal assessments, swept path	National Highways have undertaken a series of construction specific engagement sessions with Thurrock Council. A series of additional commitments have been included into the oTMPfC to reflect these discussions, and the oTMPfC further sets out provisions for ongoing engagement on these matters throughout construction. Discussions to draft a suitable framework for inclusion in oTMPfC documents is ongoing. National Highways have developed the 11 phase programme to describe the works, to aid in the development of the assessments and the representation of the impacts. Our presentation of this programme has been developed to ensure that the proposals present a reasonable worst case and are representative of the impacts during each of the 11 phases. Revised construction cordons based on a 2030 opening year have been shared with the Council providing a further updated view. These were accompanied by a technical note giving more details on the modelled HGV and workforce movements. Combined with the draft oTMPfC and OMHP, this now provides a considerably developed understanding of the impacts of movements associated with the construction works.	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion

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		<p>testing on unclassified roads to check the feasibility of HGV use and if any widening is needed, etc.) and outline what mitigation is proposed to accommodate additional traffic</p> <p>Some of these locations of concern relate to where haul roads either cross or enter onto the local road network. National Highways need to consider greater internal haul road connectivity to reduce construction traffic on local roads.</p>	<p>As part of the technical engagement sessions the topic of internal haul roads and connectivity was discussed in detail. This involved the project presenting illustrative layouts of the internal haul road and responses to any comments raised by Thurrock. In addition, a written response was provided in Sept 2022 to address the individual comments raised on the internal haul road.</p> <p>During construction the appointed contractor will develop their haul road requirements to facilitate their construction methodology and phasing, whilst adhering to the principles set out in the OTMPfC and OMHP.</p> <p>In establishing the access routes that connect onto haul roads to access compounds, the appointed contractor would take a risk-based approach when choosing and implementing traffic management measures. This would be dependent on several factors including but not limited to traffic counts, types of traffic, WCH interface, nearby points of interests (e.g. schools) and will include engagement with relevant authorities. Further detail on establishing and maintaining construction access routes is detailed within the OTMPfC.</p> <p>These matters will be set out in further detail in the plans to be developed by the Contractor prior to commencement, and discussion will continue as these plans are developed should the DCO be granted.</p>		
Rat Running during Construction	2.1.121	The disruption on the road network resulting from the construction of the Project will lead to changes in the movements of local traffic	National Highways provided further information on road maintenance and rat running issues in a presentation to Thurrock Council in May 2022, which outlined the Project position on these matters and next steps. National Highways recognise the need for providing support to the	N/A	Matter Under Discussion

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		unrelated to the construction work. Thurrock Council are concerned that this will lead to rat-running around construction sites, leading to adverse impacts on local communities. For example, traffic rat running via Marshfoot Road and by the two schools that will exist then, to avoid the congestion on the A1089.	local authority on these matters, also the potential benefit of delivering some works in advance of the start of construction. As a consequence, National Highways have set up a working group to discuss issues of road maintenance and rat running in detail with Thurrock Council, and further workshops and site visits are planned. As specific interventions are identified and agreed, National Highways will work with Thurrock Council to formulate suitable agreements to fund these works.		
Monitoring during Construction	2.1.122	This Council would have expected to see any monitoring during construction to form part of a much wider monitoring and evaluation plan for the Project to demonstrate the Project impacts in a much wider sense considering a range of socio, economic and environmental issues. This does not seem to be the case from the documents presented for consultation. It is unclear what road network impact monitoring is proposed before and during the construction period. Monitoring will be required to ensure impacts of the construction logistics. Further discussions to agree a	For the construction phase, the monitoring requirements (across several topics) are set out in a range of documents; notably the REAC, CoCP, FCTP, and even the SEE strategy (appended to the s106 Agreement). However National Highways note that one of the key issues raised by Thurrock Council is traffic monitoring on local roads during construction, and discussions to draft a suitable framework for inclusion in oTMPfC documents is ongoing.	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion

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		construction traffic monitoring framework are ongoing.			
Production of the Traffic Management Plans (TMP)	2.1.123	<p>The production of the TMP is required 'before commencing the relevant part of the Project'. This is vague. The oTMPfc should make a commitment to the production of a TMP by the contractor in advance of all works associated with the scheme (including enabling, site establishment and decommissioning phases.). Enabling, site establishment and decommissioning works can be significant in terms of their impacts on the highway network. The undertaking within the oTMPfc must link to the stages of the works across the separate contracts. Due to the length of the works, it will be anticipated that the contractors will need to prepare a series of TMPs which are relevant to subsets of their contracted works. The framework must reflect this and ensure that the TMPs are kept current and relevant.</p>	<p>There are appropriate controls in place in relation to works carried out prior to commencement, including the commitment to utilise the permit schemes (subject to modifications), and consultation or approval requirements in relation to temporary traffic management measures under the dDCO (both of which apply to pre and post-commencement works); as well as a preliminary works Environmental Management Plan. The position has been reconsidered for our DCO application, as the view is that it would be disproportionate to require the TMPs to be prepared in advance of all works, given the level of measures proposed to be in place</p> <p>Thurrock Council have seen the Project position set out above but are yet to provide feedback.</p>	Draft Development Consent Order (3.1)	Matter Under Discussion

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Production of the Traffic Management Plans (TMP)	2.1.124	<p>The oTMPfC should make clear the requirement for the contractor to undertake the following during development of the TMP:</p> <ol style="list-style-type: none"> 1. Consider and assess a range of alternative Traffic Management options 2. Undertake a safety assessment / audit 	<p>The oTMPfC will be developed into detailed TMPs post DCO grant and the additional details will be drafted in consultation with Local Authorities through the Traffic Management Forum (TMF); the outline plan sets out the principles that would be followed in the development of the detailed plan.</p> <p>1. Traffic management will be designed and implemented to be effective in all lighting conditions, weather conditions and under all envisaged circumstances. The Contractors would demonstrate that their traffic management proposals had been developed to consider alternative options, minimal traffic management measures, safety and space assessments to reduce delays, disruptions and diversions to traffic. Further details of proposed measures are contained below.</p> <ol style="list-style-type: none"> a. In the event a road has to be closed for construction purposes which require traffic to be diverted, meetings would be held with the appropriate highway authority as part of the TMF to ensure minimal disruption to road users and communities affected by the diversion. b. Provision for potential emergency closures would also be discussed for certain roads as deemed appropriate. c. For the purposes of protecting the workforce and the public while maintaining traffic, the TMP will secure appropriate traffic management measures, including narrow lanes, lane closures, closures with diversions, etc. These measures would introduce safe working zones (through use of cones and/or safety barriers as appropriate) adjacent to the carriageway as required by Chapter 8 of the Traffic Signs Manual. 	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion

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			<p>2. A risk-based approach would be taken when choosing and implementing traffic management measures. This would be dependent on several factors including but not limited to traffic counts, types of traffic, WCH interface, nearby points of interest (e.g. schools) and will include engagement with relevant authorities. Where traffic signals or similar are required to facilitate construction movements such as access to compounds and construction vehicle crossing points, they will be locally controlled to ensure that the LRN has priority in terms of traffic movements. Additionally, when not required operationally the traffic signals will be turned off.</p> <p>National Highways have undertaken engagement and shared wordings for inclusion in the oTMPfC. Further discussions will be carried out with the Council post application once this finalised document has been shared.</p>		
Coordination and Management of TMPs	2.1.125	There is a need for co-ordination of the contractors to provide detailed appraisal of the effects on the road network for the delivery stages of the Project, in particular the delivery of the A13 interchange and the impacts on the operations of the network. A system for updating, coordinating and managing Traffic Management Plans is required to:	<p>The oTMPfC outlines the purpose and objectives of the document including its role in informing the post consent TMP which would be developed following appointment of the contractors, in line with the controls and commitments in the oTMPfC and in consultation with local authorities.</p> <p>The oTMPfC, illustrates the structure of the proposed Traffic Management Forum (TMF), including the ability to coordinate across contracts and the ability to adapt as a result of current situations with collaboration with relevant stakeholders. The document outlines the process and ownership structure including National Highways responsibilities. The oTMPfC also discusses the</p>	Outline Traffic Management Plan for Construction (oTMPfC) (7.14) Section 106 Agreements (7.3)	Matter Agreed, subject to review of DCO documents

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		<ul style="list-style-type: none"> • ensure that they are effective and current to changing programmes/ tasks/ methods; • give clarity of ownership of measures, enforcement and consent; • include associated off-site Statutory Undertakers Works and; • reflect on-going maintenance regimes – including street cleansing <p>These need to be secured through inclusion in the oTMPfC.</p> <p>The oTMPfC needs to stipulate the mechanism for coordinating the Contractors' TMPs, which will often be developed at differing phases and by different Contractors. The alignment and coordination will need management, especially where the cumulative effect on the local road network (LRN) could</p>	<p>DLOA/LOA which would include maintenance regime agreements between the contractor and Local Highways Authority.</p> <p>The TMF has a direct link to the JOF in terms of reporting and escalating issues. Although the LAs are represented on the JOF, the oTMPfC also commits to a monthly Traffic Management Forum (TMF) to be chaired by National Highways Traffic Manager. Attendees to the forum would include Local highway authorities, emergency services, community reps and other affected stakeholders relevant to the scope of works.</p> <p>National Highways is committed to providing a dedicated resource for Thurrock Council to cover the requirements to manage the transport network in response to the impacts of the Project's construction (Hatch ask -CLS12, Issue 2.1.173), secured via the s106 Agreement.</p> <p>Thurrock Council are agreed in principle with the position set out above, but would like to review the DCO documents before formally agreeing this matter.</p>		

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		<p>be partly out of the control of the Local Highway Authority (LHA), if the proposals for such processes as Permitting are consented as set out within the draft DCO. The establishment of a Joint Operations Forum (JOF) indicated in the Code of Construction Practice (CoCP) is noted, however the LHA is not party to that forum. The Council would wish to see proposals for network co-ordination which could consist of monthly update meetings through the Traffic Management Forum (TMF).</p>			
Post-consent traffic modelling requirements	2.1.126	<p>The outline Traffic Management Plan for Construction (oTMPfC) must set out the project position on post consent traffic modelling requirements.</p> <p>The detailed models must use appropriate Transport Planning modelling software and reflect the stages of the construction. They must demonstrate how they affect the operations on the local roads and how those effects are mitigated. The</p>	<p>Where necessary, local junction models will be prepared to support the planning of construction works. These local junction models will be developed in collaboration with the relevant highways' authority and local authority. This commitment will be secured via the oTMPfC.</p> <p>The construction cordon models have been shared in May 2022, and a response is awaited.</p>	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion

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		<p>strategic level analysis of the construction impacts using the LTAM Saturn model will give an indication of the strategic effects but will not inform the detailed management and mitigation of effects during the delivery of the scheme.</p> <p>National Highways and its contractors must engage with the Council when preparing and analysing the effects of the work stages. This is essential to allow the Council to carry out its Network Management duties. This commitment must be covered by a Requirement within the DCO, including defined engagement periods and communication strategies.</p>			
Incentivisation, Reporting and Enforcement and the governance processes	2.1.127	<p>The Council need further information on proposed incentivisation, monitoring, reporting and enforcement arrangements that will be put in place across all construction phases, particularly</p> <ol style="list-style-type: none"> 1. how will the contractors be incentivised (e.g. in the FCTP/oMHP) to exceed 	<p>The Traffic Management Forum committed to in the oTMPfC is designed to bring together Client, contractor and stakeholders together to discuss proposals, issues and performance of all things traffic related, including monitoring and reporting. National Highways have set out a range of commitments in a series of control documents and non-compliance would be considered a breach of the DCO.</p> <p>However, enforcement of non-compliance, development of KPIs and provision of incentives for contractors to</p>	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Not Agreed

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and dispute mechanisms		<p>targets and reduce impacts on travel network</p> <p>2. the Key Performance Indicators (KPIs) that will be regularly reported on; and</p> <p>3. effective enforcement mechanisms which will be used e.g. consequences of non-compliance and consequence of targets not being met in the FCTP.</p> <p>The control documents must set out requirements for a defined management and governance process which encompasses the mechanisms by which the contractors' compliance is judged and measured. It must set out the corrective action procedures and timescales and the way in which dispute is resolved. The day-to-day governance process must be a system operated by the Client and the affected Local Authorities in collaboration with the Contractor. Only unresolved disputes should be referred to the Secretary of State.</p>	<p>exceed targets are a matter of contract between National Highways and its contractors and as such may contain commercial sensitive and confidential information which will not be shared. Unresolved disputes will be referred to the Joint Operations Forum (JOF) for resolution</p> <p>The Council do not agree with the Projects position as set out above.</p>		

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A13 Junction; Construction	2.1.128	The Council are concerned that the complexity of the A13 interchange will lead to substantial disruption and delays due to the required temporary traffic management during the works.	<p>Details of construction phase impacts were presented at the Community Impacts Consultation in summer 2021. More detail on construction phasing will be developed by the contractor following DCO grant. National Highways are committed to sharing phasing plans post consent (if consented) for information as stated in the Code of Construction Practice (HATCH-M1, Issue 2.1.107).</p> <p>National Highways have undertaken further engagement with the Council, as part of the fortnightly construction sessions, looking at the construction of the A13 junction and the potential consequential impacts. The oTMPfC sets out the control measures that will be in place to manage traffic through construction.</p>	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Not Agreed
Management of incidents	2.1.129	Thurrock Council consider there is a lack of information on the process for management and reporting of incidents and emergencies which affect the operation of the travel networks, which should include contingency planning and defined contingency routes and the reporting processes of the incidents.	<p>The Detailed Local Operating Agreements (DLOA) or a Local Operating Agreement (LOA), required under the oTMPfC, will outline procedures for incident management. National Highways is open to discussing existing contingency plans and potential changes required during the Project's construction phase. Discussions will be carried out with Thurrock Council regarding this proposed framework during the development of the TMP and the DLO, should consent be granted.</p>	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion
Impact of construction works on PROWs	2.1.130	During construction, National Highways have advised of their intent to close several PRoW and WCH routes. For example, Footpath FP79, 82, 93, 94, 95,	Three topic specific meetings have been organised to date with Thurrock Council, most recently on 9th August 2022, to discuss the suitability of proposed temporary diversion routes during construction. National Highways have completed discussions with other relevant parties	Outline Traffic Management Plan for Construction	Matter Under Discussion

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		96, 97, 104, 136, and BR 161, 2056, and 219 all face closures of between 8 months and 5 years. The Council has previously requested provision of temporary diversions to routes of suitable and similar standards for all closures to avoid severance and other community effects. National Highways need to present final proposals for all these closures and diversions before DCO submission. As such, a robust assessment of the potential effects to active travel for the construction phase cannot yet be made. National Highways are having ongoing discussions relating to the management of PRow closures. Thurrock Council expect to see the outcomes of these discussions secured within the appropriate control documents.	<p>such as local riding schools before finalising the proposals.</p> <p>The final proposals (for closures and diversions) and the associated commitments, which will be secured via the oTMPfC and the Rights of Way Plans, are currently being considered by Thurrock Council.</p> <p>Additionally, the oTMPfC provides a framework for dealing with such stakeholder considerations. Table 2.3 outlines the relevant stakeholders (i.e. WCH users), their requirements and how subsequent Traffic Management Plans (TMPs) will take these requirements into account. These TMPs will be developed post consent, if the Project is consented to, and in line with the controls and commitments in the oTMPfC. Thurrock Council will be a consultee when developing this document.</p> <p>Thurrock Council have seen the commitments set out above but are yet to provide feedback.</p>	(oTMPfC) (7.14) Rights of Way & Access Plans (2.7)	
Management of interfaces between construction	2.1.131	The oTMPfC is silent on the methods of management of interfaces between construction traffic corridors and vulnerable users along	Considerations of affected stakeholders are contained in Table 2.3 within the oTMPfC (under the headings of Walkers, cyclists and horse riders, sports clubs, nearby events local businesses and residents). The oTMPfC also lists out the requirement of these affected	Outline Traffic Management Plan for Construction	Matter Agreed, subject to review of

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on traffic and vulnerable users		<p>access corridors. The interface with vulnerable users is much broader than at PROWs. What methods of safety management and initiatives, reductions in fear and intimidation and mitigation of severance are to be committed to for the contractors to adopt within their TMPs?</p> <p>For example, Muckingford Road must be protected from the impacts of construction activity in the early years of the Project before haul routes are established within the line of the LTC. Without suitable mitigation and protections to vulnerable users, such as those accessing the recreation ground at the northern end of Muckingford Road, and residential properties on that corridor. Therefore, construction traffic must not be permitted to use Muckingford Road to access the works including the construction of the realigned section that will form the overbridge of LTC or other early works.</p>	<p>stakeholder and how post consent Traffic Management Plans would take these into account. Traffic-signal-controlled pedestrian crossing points or similar would be provided where appropriate (i.e. based on road usage, safety considerations, pedestrian usage etc). Using this robust framework, post consent TMPs, if the Project is consented to, will develop site specific measures, in line with the controls and commitments of the oTMPfC, and in consultation with Thurrock Council.</p> <p>Thurrock Council are agreed in principle with the position set out above, but would like to review the DCO documents before formally agreeing this matter.</p>	(oTMPfC) (7.14)	DCO documents

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Impacts on bus networks and lack of mitigation/funding	2.1.132	<p>The Council believe impacts on the local bus network during construction should be assessed, and suitable monitoring and mitigation measures provided to reduce impacts on operators and bus passengers</p> <p>1. More information is needed on the impacts on journey times. Mitigation is required for the adverse impact on journeys between Thurrock and Basildon (in particularly the Thurrock University Hospital located in Basildon and between Basildon and employment in Thurrock). Impacts on bus journeys to and from this site could have an adverse impact on health, reducing health enhancing behaviours (e.g. attending clinics/checks/screening) if accessibility is reduced.</p> <p>2. Consideration should be given to relocation of a pair of bus stops at Heath Road (due to be relocated by 400 metres) and the potential impacts (re</p>	<p>The forecast impact on bus networks as a result of the construction and operation of the Project was set out in the Community Impact consultation, and further information is provided in the Transport Assessment.</p> <p>The oTMPfC provides a framework for dealing with such stakeholder considerations. Table 2.3 outlines the relevant stakeholders (i.e. Public transport users and operators), their requirements and how subsequent TMPs will take these requirements into account. It also sets out how the Project would liaise with bus operators to ensure that impacts on their services and consequently their customers are minimised. These TMPs would be developed post consent, if the Project is consented to, and in line with the controls and commitments in the oTMPfC. Thurrock Council will be a consultee when developing this document. The oTMPfC also commits to a Traffic Management Forum, where relevant bus operators could be invited, in relation to the works being planned and progressed at that time.</p> <p>1. National Highways have set out impacts on local roads during construction both in the consultation and through the provision of traffic modelling results. National Highways are continuing to actively engage with Thurrock Council in relation to the impacts of the Project on Thurrock's roads during construction. Information including construction models for review has been provided, and a Transport Assessment is included with the DCO submission.</p> <p>2. National Highways note the comments from the Council with regards to the proposed relocation of these</p>	Outline Traffic Management Plan for Construction (oTMPfC) (7.14) Transport Assessment (7.9)	Matter Not Agreed

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		<p>health and accessibility) on elderly residents of the area.</p> <p>3. National Highways states that "longer-distance coaches" may transfer from the Dartford Crossing to LTC. This would not apply to London bound coaches which are not able to access A13 west of LTC and are therefore not able to open up to the market within Thurrock.</p> <p>4. Funding should be made available to address the issues above, as necessary. In the Council's opinion, it would not be in the public interest to have to retrofit at great expense adjustments to the tunnel and associated works, which had only just been completed. The Council would welcome comments on how National Highways has engaged with the design requirements to accommodate the future change in public transport demand and use.</p>	<p>bus stops. Details of the management of these bus stops will be discussed once the contractor plans are defined.</p> <p>3. The services and routings that private coach operators select is a matter for them and their commercial considerations. As with local public transport, the Project is available for use by long distance coaches.</p> <p>4. No specific funding is proposed to be made available.</p>		

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Impacts on public transport	2.1.133	National Highways have set out impacts on traffic and public transport links due to traffic management measures at a ward level. The Council question how these impacts fit into surrounding wards and the borough more widely in terms of supporting connectivity for local residents and reducing severance. Bus routes and roads are not situated in silo but rather interlink and support residents to access local amenities and social activity opportunities. A further understanding of how closures, diversions and other traffic management measures will impact on different wards throughout the duration of the construction phase is needed, in particular how this will be monitored and what mitigation measures will be taken to reduce impacts on bus operators and passengers.	<p>The level of details sought by Thurrock Council would be available when the Traffic Management Plans are developed. The oTMPfC, however, provides a framework for dealing with such stakeholder considerations. Table 2.3 outlines the relevant stakeholders (i.e. Public transport users and operators), their requirements and how subsequent TMPs will take these requirements into account. These TMPs will be developed post consent, if the Project is consented to, and in line with the controls and commitments in the oTMPfC. Thurrock Council will be a consultee when developing this document.</p> <p>Additionally, oTMPfC is committed to a Traffic Manager and Traffic Management Forum (TMF), with attendees, consultees and contributors listed. The TMF, specifically, is intended to resolve, through consultation and exploring the local knowledge that the relevant authority possess and incorporating that knowledge into the Traffic Management Plans (TMPs). As part of the preparation of TMPs, all temporary traffic management measure proposals will be consulted on with the relevant authority, as set out in the oTMPfC. As such, the exact length, nature and duration of temporary traffic management measures will be discussed and relevant authority comments, issues considered and incorporated where reasonably practicable.</p> <p>Impacts to public transport including bus routes are highlighted within the TA. Impacts to journey times and reliability are presented within TA Chapter 8. Impacts of construction on human health, equality and severance are covered in the HEqIA. Impacts of construction on residents is covered in ES Chapter 13.</p>	<p>Outline Traffic Management Plan for Construction (oTMPfC) (7.14)</p> <p>Transport Assessment (7.9)</p> <p>Health and Equalities Impact Assessment (HEqIA) (7.10)</p> <p>ES Chapter 13 - Population and Human Health (6.1)</p>	Matter Under Discussion

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Communication and Notice Periods for local community	2.1.134	<p>National Highways must specify</p> <p>1. The period of advance notice prior to implementing the closures and diversions and the mechanism for those notices. A minimum of four weeks' notice of closures and diversions is suggested.</p> <p>2. How communications will be managed to ensure communities are kept informed (especially hard to reach communities). 3. The Council require further information well in advance of when and where temporary road diversions occur.</p>	<p>The CoCP outlines the Project's approach to community engagement during the construction phase. National Highways have committed to a Engagement and Communications Plan (ECP), which will be developed with the Local Authorities, post consent, if consented. It would cover communications, reporting metrics, programme of activities and communicating with target audiences/ hard to reach groups. The ECP will provide a detailed programme of community engagement, setting out how relevant planning authorities, communities, stakeholders and affected parties will be engaged with throughout the construction period. It will specify stakeholders, communities and affected parties (such as schools, places of worship, businesses and environmental organisations) and for each group, identify the proposed methods and likely timing of consultation for each key stage of work. The CoCP also includes commitment to community liaison groups, a helpline and notice of works (currently set at 2 weeks).</p> <p>National Highways proposes to utilise the Council's permit schemes subject to modifications which are compatible with the precedented approach and would ensure that conditions which may conflict with an Order (if granted) could not be imposed on National Highways. The permitting process requires that the Council are provided information in advance.</p>	Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)Draft DCO (3.1)	Matter Under Discussion
Management of Abnormal Indivisible	2.1.135	National Highways need to set out how they will manage AILs, including the provision of notice periods and the	The oTMPfC commits to the use of Electronic Service Delivery for Abnormal Loads (ESDAL) to communicate AIL notices.	Outline Traffic Management Plan for Construction	Matter Agreed

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Loads (AILs)		permitting mechanism to be applied. This needs to align with standard adopted protocols, to allow co-ordination across the contracts and also with external AIL movements	Thurrock Council have seen the commitment set out above and marked the matter agreed.	(oTMPfC) (7.14)	
Use of look-ahead projections	2.1.136	National Highways need to commit to weekly look-ahead projections to be provided by the contractor or National Highways, giving a co-ordinated projection of construction related traffic on the affected network.	<p>The Material Handling Plan (MHP), developed post consent, (if consented) and in consultation with Thurrock Council, will include detail of delivery demand forecasts, as well as management systems, to capture performance.</p> <p>It should be noted that the principles and mechanisms set out in the oTMPfC will be applicable to the oMHP . This includes the monthly Traffic Management Forum (TMF) committed to in the oTMPfC, which is designed to bring together Client, contractor and stakeholders together to discuss proposals, issues and performance of all things traffic related, including materials movements. The timescales/frequencies will be considered at the TMF when the detailed Terms of Reference are drafted.</p> <p>Thurrock Council are agreed in principle with the position set out above but would like to review the DCO documents before formally agreeing this matter.</p>	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Agreed, subject to review of DCO documents
Use of autonomous plant	2.1.137	National Highways need to set out how contractors will optimise the use of autonomous plant and equipment and a modernised fleet to reduce risks.	The commitment to encourage the Contractors to optimise the use of autonomous plant and equipment and a modernised fleet is included in the CoCP. However, it is for the Contractors to identify opportunities to use autonomous plant and equipment. National Highways will support this approach where is	'Code of Construction Practice including the Register for Environmental	Matter Agreed, subject to review of DCO documents

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			<p>appropriate, recognising that it can reduce risk. However, National Highways will not pre-judge when and where autonomous plant and equipment will be employed.</p> <p>Thurrock Council are agreed in principle with the position set out above, but would like to review the DCO documents before formally agreeing this matter</p>	<p>Actions and Commitments (6.3)</p>	
Mitigating cumulative effects	2.1.138	<p>There is no mention of commitments to mitigate/enhance the cumulative effects (either intra-related/interrelated) of the construction of the LTC. National Highways should ensure that cumulative effects during construction are included and sufficiently assessed and mitigated against as required.</p> <p>Such potential effects could have a significant negative impact on residents' health and wellbeing through increased noise, air pollution, particularly in areas where there are high levels of deprivation, and poor health, such as Tilbury.</p>	<p>Effects on health and wellbeing are presented in ES Chapter 13 Population and Human Health, and the Health and Equalities Impact Assessment (HEqIA). Where appropriate, mitigation measures associated with these effects have been proposed and are included in a range of control documents, most notably the REAC. The REAC covers air quality and noise mitigation and also presents a framework for exceedances.</p> <p>Further assessment of cumulative effects is presented in ES Chapter 16, including a consideration of further mitigation measures, in addition to those identified for individual topics.</p> <p>National Highways have set out the impacts both during consultation and engagement with the Council. Documents setting out the assessment framework and the likely effects have been shared. Further discussions will be carried out with the Council once the finalised assessments have been shared.</p>	<p>ES Chapter 13 - Population and Human Health (6.1)</p> <p>ES Chapter 16 - Cumulative Effects Assessment (6.1)</p> <p>Health and Equalities Impact Assessment (HEqIA) (7.10)</p> <p><i>'Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)</i></p>	Matter Under Discussion

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Worker travel between compounds	2.1.139	What measures will be put in place to ensure that workers from wards south of the river that work at compounds north of the river do not travel by car?	<p>The Framework Construction Travel Plan (FCTP) sets out principles for worker travel to compounds. With regards to measures that would restrict the use of private vehicles for workers travelling from South to North of the river, National Highways do not propose to adopt any such proposals as these could be deemed to exclude workers that live south of the river from the opportunity for employment that LTC represents.</p> <p>The tasks set out in Table 10.1 (Project action plan) will be undertaken to</p> <ol style="list-style-type: none"> 1. maximise the most effective travel patterns between the workforce origin location and compound location (using post code analysis with the aim to reduce the distance travelled) and 2. encourage the use of sustainable measures where this cannot be provided, such as through the use of shuttle bus services and car share schemes etc. <p>It should be noted that the Project is committed to developing site specific travel plans post DCO consent, if consent is granted, in line with the controls and commitments in the FCTP. Relevant local authorities, including Thurrock Council, would be a consultee to the development of this document.</p>	Framework Construction Travel Plan (FCTP) (7.13)	Matter Not Agreed
Access to accommodation and welfare facilities outside	2.1.140	How will access to accommodation and welfare facilities within the compounds be managed outside of working hours to ensure construction vehicle movements are not occurring	<p>The CoCP highlights the core working hours strategy, with exemptions listed within, when construction movements will occur.</p> <p>National Highways does acknowledge that not all staff will arrive by 6am and leave after 8pm, and also that, where compounds contain accommodation facilities, that work force will enter and leave compound areas outside</p>	'Code of Construction Practice including the Register for Environmental Actions and	Matter Under Discussion

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working hours		during those periods i.e. differentiating between accommodation movements (including deliveries) and construction-based movements?	of the CoCP working hours. Automatic Number Plate Recognition (ANPR) will be in use at compound locations, this provides data that can be audited to confirm that only authorised vehicle movements happen outside of the core working hours as determined in the CoCP. Draft versions of these documents have been shared and consulted on. Further discussions will be carried out with the Council once the finalised document have been shared.	Commitments (6.3) Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	
Operation and Maintenance					
Limited progress on issues of concern and insufficient details for incident management	2.1.141	LTC has demonstrated limited progress on the ESSPG's 56 specific recommendations as outlined in the CIC and supported by all local authorities including Thurrock Council. The Council is concerned about the lack of adequate provision for emergency services within the LTC scheme, especially around 1. the timely safe and efficient access to and from incidents for the emergency and rescue services; 2. management of traffic and people affected by those	The ESSPSG was formed and funded to address the identified issues around operations and incident management. The engagement is active and ongoing. The ESSPSG platform provides blue lights services with an opportunity to express their concerns collaboratively and resolve key issues. Previously the discussions on the matters of concern to the blue lights services have taken place in ESSPSG and break-out working groups resulting in significant Project changes. Examples these issues include; key changes made included identifying location and requirements for RVP locations and assembly point locations and agreeing the provision of helicopter landing points during the construction and operation of the project for emergency services. There are still some outstanding issues and one session to discuss Safety and Security is planned. The Project, at the request of the ESSPSG is developing a Statement of Common Ground to address some of the matters which are still under discussion and set out those matters which	Works Plans (Key Plan) (2.6)	Matter Not Agreed

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		<p>incidents; locations of rendezvous points (RVP) and emergency hubs</p> <p>3. management of the impacts on local routes as a consequence of those incidents including emergency service response times</p>	<p>have been agreed and not agreed. This Statement of Common Ground will be submitted at the first application deadline.</p> <p>1. Ongoing discussion continues relating to timely, safe and efficient access.</p> <p>2. We have identified potential RVP locations in consultation with ESSPSG. These are now included in the Works Plans (Key Plan). Exact location for assembly points will be an item within detailed design.</p> <p>3. An multi-agency Emergency Response Plan would be developed based on the Operational Control Philosophy and Operational Risk Assessment. This will be developed through detailed design and construction ready for testing and implementation prior to road opening. It is not considered appropriate or necessary to secure operational incident management requirements within the draft DCO or Control Plan framework. National Highways will continue to work with emergency services, and it does elsewhere on the network. Any defined operational controls fixed at this point in time would be superfluous, and raise the risk of constraining the effective management over the future of the scheme.</p>		
Maintenance of the PROW infrastructure	2.1.142	More detail is needed on how the maintenance of the PROW infrastructure, during construction and operation.	During the construction phase, management of PROW infrastructure will remain the responsibility of Thurrock Council as the Local Highway Authority. As committed to in the oTMPfC, LTC would ensure any temporarily diverted routes are designed with users in mind and that consideration is given to visual, hearing and physically impaired users. Diverted and existing routes will also be clearly signed and segregated from construction sites.	Outline Traffic Management Plan for Construction (oTMPfC) (7.14) Draft Development	Matter Under Discussion

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			<p>During the operational phase public highway assets including PROW that sit within the jurisdiction of Thurrock Council will be maintained by Thurrock Council as the Local Highway Authority, this will include the road surfacing over structures from the (but not including the) waterproof layer. Green elements of Green Bridges will be managed by National Highways who will put in place an appropriate maintenance programme.</p> <p>Further information will be communicated to local authorities in due course.</p>	Consent Order (3.1)	
Traffic and Economics					
Model development Changes to A13/Orsett Cock Junction Arrangements - Impact of proposed new link on local roads	2.1.143	<p>The Council does not think LTAM is a suitable tool to predict traffic effects on the local network and needs to be validated against observed traffic levels on the local roads and key junctions. Thurrock Council have a number of concerns relating to the methodology applied to development of the traffic model, including:</p> <ul style="list-style-type: none"> No local road traffic counts (except on the A13) have been used to calibrate or validate the model. 	<p>National Highways are of the firm opinion that the calibration and validation of the Project's transport model is acceptable for its use to assess the impacts of the Lower Thames Crossing. The model has been assessed by an independent assurer within National Highways who has approved the model as being suitable to assess the predicted impacts of the Lower Thames Crossing.</p> <p>However, National Highways have rebased the 2016 (base) model following the release of traffic count data near Orsett Cock to us by the local authority.</p> <p>In addition, National Highways are working with Thurrock Council to undertake micro-simulation modelling of key junctions that are of concern to them.</p> <p>National Highways are continuing to actively engage with the Council with regards to the forecast impacts of the Project on the road network in Thurrock during operation. This includes microsimulation modelling at key junctions to provide additional assurance alongside the cordons of</p>	Transport Assessment (7.9)	Matter Under Discussion

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		<ul style="list-style-type: none"> The model is based upon the strategic road network peak in the morning, rather than the local network peak. <p>A comparison of the model flows compared to observed flows undertaken by the Council which shows that, in general, the traffic flows output from the LTAM modelling are low on local roads in the base year model in comparison to the observed traffic flows, and in particular, low on: the A1013; links near Orsett Cock; on A1014 The Manorway; and A1089 near the ASDA roundabout.</p> <p>We would also expect analysis / sensitivity testing to have been completed by National Highways to demonstrate the validity of LTAM given significant events that have influenced travel patterns, such as the pandemic and associated working pattern changes. No evidence of this has been presented.</p>	<p>LTAM and GIS shapefiles. The scope of this work has already been agreed with the authority. National Highways are also regularly meeting with Thurrock Council to examine the forecast construction impacts and our proposed measures to reduce these.</p> <p>National Highways have undertaken an appropriate design process, which has included testing the performance of the design through modelling. To assist the Council with their understanding of how the project functions, we have undertaken further local modelling in a collaborative framework, seeking to achieve agreement on the model design and inputs to improve confidence in the model outputs. This engagement has been ongoing on certain agreed areas, and information has been supplied to the Council on a progressive basis.</p> <p>National Highways do not consider it necessary to undertake the collaborative local junction modelling exercise for the A1089 ASDA roundabout, as the operational impacts on flows through this junction are limited.</p> <p>National Highways have developed the traffic modelling in accordance with the relevant guidance. This does not set out a requirement or framework for considering the pandemic, and so this has not been produced.</p>		

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		<p>Ongoing modelling work and gaps</p> <ul style="list-style-type: none"> • Updated cordon models have been provided to the council for impacts on local roads and National Highways' strategic road network. • Micro-simulation (VISSIM) models are now being developed by National Highways for the A13 Orsett Cock, A13 The Manorway and for an East-West Corridor through Thurrock (A13 Stifford Clays – A1013 Lodge Lane – A1013 Daneshole Roundabout – Old Dock Approach Road – Marshfoot Road / A1089) and this ongoing work is being discussed with the Council. However, future year forecast models including LTC traffic have not yet been developed to 			

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		<p>demonstrate that once LTC is operational that these can operate efficiently and with a good level of service.</p> <ul style="list-style-type: none"> • National Highways is also currently not proposing to develop a VISSIM model of the A1089 ASDA Roundabout which the Council believes is a critical gap in this work programme. • A Local Model Validation report is outstanding • We would also expect analysis / sensitivity testing to have been completed by National Highways to demonstrate the validity of LTAM given significant events that have influenced travel patterns, such as the pandemic and associated working pattern changes. No 			

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		evidence of this has been presented.			
Operational model development	2.1.144	The traffic model presents a number of network restrictions, such as HGV bans. Thurrock Council have concerns around the practical implementation and operation of enforcement, and hence the realism of these modelling adjustments.	The network within the Project's transport model only includes existing network restrictions such as existing HGV bans. National Highways have not made any adjustments within the model to prohibit rat-running. Vehicles are free to choose their preferred route given the existing network restrictions and forecast speeds along each link and at the junctions. Thurrock Council have seen the Project position set out above and further comments are awaited.	N/A	Matter Under Discussion
Sharing of full LTAM operational model	2.1.145	Thurrock Council have requested issue of the full LTC Traffic Model (LTAM) to allow the Council to undertake its own review of the cause of changes in traffic flows within Thurrock for journeys that start and / or end outside Thurrock. National Highways have advised that they will not share the full traffic model.	It is not normal practice for highways development projects to share full traffic models, and National Highways do not intend to share our full model. The Lower Thames Area Model (LTAM) is an extensive and complex model which has been developed over a number of years to support the Lower Thames Crossing (LTC) development. National Highways are regularly updating it to reflect changes in guidance, to reflect new regional developments, and to reflect the latest plans for the LTC. If LTAM were to be released, the model would then be able to be modified by third-parties, which could result in significant confusion over which outputs were accurate reflections of the National Highways proposals. Following the conclusion of the LTC DCO statutory process, we will make a finalised version of the LTAM model available to all stakeholders. National Highways recognise the Council's concerns that the Project will create regional changes in traffic movements, and that to understand this the Council	N/A	Matter Not Agreed

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			<p>would like to utilise the model to interrogate the forecasts in more detail. However, National Highways has provided the Council with both a cordon model of the local authority area, which allows for the assessment of these changes at a local level, and a GIS file of the full model output, which can be used to answer many of these questions.</p> <p>Since this request National Highways have released the operational cordon models in April and the construction cordon models in May for Thurrock Council to investigate and understand the strategic and local impacts of the Project.</p> <p>Following a request in early 2022, National Highways organised a joint meeting with Thurrock and Essex CC to better define the information that is needed by both Councils. Following this session that information was provided. National Highways also have a fortnightly traffic modelling meeting with the modellers of LTC and Thurrock Council to discuss ongoing work, timescales, and technical issues as they arise. A programme of work (for the various components of traffic modelling being undertaken for Thurrock Council) has also been shared. National Highways will continue to engage with Thurrock Council on all relevant traffic and transport matters throughout the DCO process and provide additional information to aid your understanding of technical matters.</p>		
Impacts on Local Plan	2.1.146	The proposed LTC does not make provision for, and is inconsistent with, the housing	The Traffic Forecasts Non-Technical Summary has been produced to provide a high-level summary of the work undertaken in the development and use of the Project's	Traffic Forecasts	Matter Under Discussion

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		<p>and development potential as set out in Thurrock's emerging Local Plan and South Essex Joint Strategic Plan. Thurrock Council is planning for the delivery of an additional 1,169 - 1,381 homes per annum, which equates to a total housing requirement of up to 32,000 new homes in the period to 2038. Furthermore, ASELA is working to bring forward a joint spatial plan (JSP) for South Essex which must plan for 97,000 homes over the period to 2038 and has a longer-term vision which extends over the period to 2050 (152,000 homes). Thurrock is considered well placed to take more than its 25% share of new homes in South Essex.</p> <p>Thurrock Council consider that LTC would result in strategic issues for existing communities, employment areas and ports, as well as for future growth in Thurrock. This conflicts with the project's objective 'to support</p>	<p>transport model. This document is fully consistent with the more detailed documents including the ComMA and Transport Assessment. The Transport Forecasting Package provides full details of the Uncertainty Log.</p> <p>As set out in the ComMA, growth in the Project's transport model has been capped on a regional basis in line with DfT traffic forecasts, up to 2051. Planned growth that is not under construction, does not have a planning application or planning permission (as of 30th September 2021 for our DCO submission) is not explicitly included within the transport model in accordance with TAG.</p> <p>National Highways have undertaken a number of model runs to assist the Council with their emerging local plan. National Highways have also worked with the Council to undertake testing to support and assess their local plan on the highway network using the LTAM.</p>	<p>Non-Technical Summary (7.8) Combined Modelling and Appraisal Report (7.7)</p>	

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		<p>sustainable local development and regional economic growth in the medium to long term'</p> <p>The Government will be bringing some changes to the standard method in the short term, which are not expected to change Thurrock's requirement. In the longer term, the Government's 2020 Planning White Paper indicates that there could be wholesale changes made to the setting of housing requirements.</p> <p>Traffic growth forecast in LTAM has been based upon TEMPro 7.2 data, which unless the housing numbers have been adjusted to reflect the emerging housing requirements, will assume 34,254.6 new households to 2042 (or 29,071 new households to 2038). 5,458.59 jobs to 2038 and 6,423.2 jobs to 2042. These assumptions are low, and the growth locations will not reflect the Council's Issues and Option Part 2 of Thurrock's emerging</p>			

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		Local Plan, where the majority of development will be on green field land, rather than intensifying the urban area.			
Impact on Orsett Cock	2.1.147	<p>Thurrock Council have concerns that the increased traffic flow through Orsett Cock roundabout means that the layout will no longer work. The Council has requested information from National Highways to address these concerns, including:</p> <ul style="list-style-type: none"> • checking the validation of the model at this location using local traffic counts • addressing the difference in the peak hour, whereby the local traffic peak is 8:00 to 9:00 while the LTAM peak is 07:00 to 08:00 • consideration of the assignment of traffic associated with the Freeport <p>While Thurrock Council acknowledge that National Highways is undertaking a</p>	<p>National Highways have undertaken a local junction modelling exercise at Orsett Cock junction, agreeing the model extents, validation process and consideration of the peak hour through a series of collaborative workshops. These results have been provided to Thurrock Council on completion demonstrating that Orsett Cock roundabout still functions safely. .</p> <p>The Freeport is not part of that assessment due to the lack of information currently available on the proposed developments (with none yet meeting the TAG criteria for inclusion in the model), and the lack of associated mitigation for the prospective new developments. The assumptions and data underlying the Project's transport model have been provided to the Council and were updated with the release of the modelling for the DCO submission.</p>	N/A	Matter Under Discussion

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		local junction modelling exercise and have worked collaboratively with the team, the Council has not yet received the results, and therefore is not satisfied that National Highways has demonstrated that this junction works.			
Impact on Manorway	2.1.148	<p>Thurrock Council have concerns that the increased traffic flow through Manorway roundabout means that the layout will no longer work. The Council has requested information from National Highways to address these concerns, including:</p> <ul style="list-style-type: none"> • checking the validation of the model at this location using local traffic counts • addressing the difference in the peak hour, whereby the local traffic peak is 8:00 to 9:00 while the LTAM peak is 07:00 to 08:00 • consideration of the assignment of traffic 	<p>National Highways have undertaken a local junction modelling exercise at Manorway junction, agreeing the model extents, validation process and consideration of the peak hour through a series of collaborative workshops. Thurrock Council have been provided with model outputs demonstrating that Manorway roundabout still functions safely.</p> <p>The Freeport is not part of that assessment due to the lack of information currently available on the proposed developments (with none yet meeting the TAG criteria for inclusion in the model), and the lack of associated mitigation for the prospective new developments. The assumptions and data underlying the Project's transport model have been provided to the Council and were updated with the release of the modelling for the DCO submission.</p>	N/A	Matter Under Discussion

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		<p>associated with the Freeport, and the final consented scheme for Thames Enterprise Park.</p> <p>While Thurrock Council acknowledge that National Highways is undertaking a modelling exercise and have worked collaboratively with the team, the Council has not yet received the results, and therefore is not satisfied that National Highways has demonstrated that this junction works.</p>			
Operational impact on Asda Roundabout	2.1.149	Thurrock Council have concerns that traffic flow through Asda roundabout will increase, and expect National Highways to set out how these increased flows are to be mitigated. Thurrock Council consider that local junction modelling of ASDA roundabout is necessary in order to validate this claim.	<p>Thurrock Council has been provided with GIS shape files and a cordons of the Project's transport model, allowing the Council to interrogate the detail of forecast flow changes such as those around the ASDA roundabout. National Highways consider that the impacts on Asda roundabout are acceptable, and do not require any further intervention.</p> <p>Further discussions will be carried out with the Council once their review of the GIS shape files and cordons is complete.</p>	N/A	Matter Under Discussion
Construction impact on Asda	2.1.150	The Council has repeatedly raised the potential for the project to negatively affect the	National Highways does not agree that it has indicated that the project has no negative impacts on the Asda roundabout during construction. National Highways has	Outline Traffic Management Plan for	Matter Under Discussion

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Roundabout		Asda roundabout and has been told that the worst case scenario modelling of the construction period has no negative impacts on that junction. Whilst the Council continues to refute that claim. National Highways must explain what the impact is of construction on Asda roundabout, and whether it that is deemed to be significant.	stated that the impacts on the junction do not prevent it from operating, albeit with delays for some users. Thurrock Council has been provided with GIS shape files and a cordon of the Project's transport model, allowing them to interrogate the detail of forecast flow changes such as those around the ASDA roundabout. National Highways consider that the impacts on Asda roundabout are acceptable, and can be managed through the construction management framework, including particularly the outline Traffic Management Plan for Construction (oTMPfC). Further discussions will be carried out with the Council once their review of the GIS shape files and cordons is complete.	Construction (oTMPfC) (7.14)	
Sharing of construction modelling Construction model development	2.1.151	The construction traffic modelling prepared by National Highways should be shared for analysis prior to the resubmission of the DCO application, allowing time for consideration of the impacts and potential mitigation. That analysis must reflect the effect of LGVs/vans as well as the movement of HGVs associated with the construction period. This should be followed by more detailed modelling and analysis of the construction stages, including but not limited to detailed analysis of the delivery of the A13	National Highways have provided updated construction model information to Thurrock Council for their review. The number of forecast LGV trips per compound is forecast as 25 trips per day for the main compounds and 15 trips per day for other compounds. As this level of demand equates to a very small number of additional LGV trips in each modelled hour, these have been excluded from the assessment within the LTAM. National Highways consider the phasing information shared with Thurrock Council and utilised within the various DCO assessments as appropriate to reflect the anticipated impacts of the works. More detailed information will be developed at the detailed design phase by the contractor, and used to inform the development of the Traffic Management Plans as required by the oTMPfC.	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion

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		<p>interchange and surrounding local roads.</p> <p>Thurrock Council have requested further clarity on the phased vehicles movements associated with the works. The information provided lacks detail regarding the timing/phasing of the works therefore it is not possible to identify the timing or quantum of vehicle movements to identify the potential impacts – this is despite the construction period apparently being divided into 11 phases. Information on the number of vehicle movements inbound and outbound should be provided on at least an averaged monthly projection to give an indication as to the impacts on the local road network.</p> <p>In addition, Thurrock Council consider that there needs to be more detailed work undertaken at selected locations including ASDA roundabout and the A13 junction's impacts.</p>	<p>As set out in the construction engagement sessions, the detail of works at the A13 junction and Asda roundabout will need to be prepared at detailed design stage by the Contractor, and the traffic management arrangements for these works set out in the post consent Traffic Management Plans on which Thurrock Council will be consulted.</p> <p>Thurrock Council have seen the project position above but is yet to provide feedback.</p>		

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Modelling Changes in Traffic	2.1.152	<p>The modelling presented in the LRC consultation material indicates that the effect of the new link road between the Orsett Cock junction and the A1089 is that the scheme is no longer reliant on the A1013 for access to the Port of Tilbury and Grays, but further evidence is needed to :</p> <ul style="list-style-type: none"> determine if the main interchange design can accommodate the significant increases in traffic shown in Figures 4-27 to 4-32. Microsimulation modelling is needed test the effects of implementing traffic. Microsimulation management measures, (assumed to be proposed as a mitigation measure) in Orsett Village. The further measures required to resolve the effects of the project on A128 Brentwood Road, Buckingham Hill Road, 	<p>National Highways are continuing to actively engage with the authority with regards to the forecast impacts of the Project on the road network in Thurrock. This includes microsimulation modelling at key junctions to provide additional assurance alongside the cordons of LTAM and GIS shapefiles. The scope of this work has already been agreed with the authority.</p> <p>The modelling information presented in the local refinements consultation showed the extent of the changes in flow that resulted from the introduction of the new link road. The Council has been provided GIS shapefile and LTAM cordons both with and without this link road, and so further comparison if desired is possible using these.</p> <p>It also should be noted that the text in Table 1 of the Guide to the Local Refinement Consultation was providing the change in flow from that presented at the Community Impacts Consultation. The overall impact of the Project including the new link road was shown in Figures 4-27 to 4-32.</p> <p>Further discussions will be carried out with the Council once their review of the GIS shape files and cordons is complete.</p>	N/A	Matter Under Discussion

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		<p>Muckingford Road and Fort Road, as this may result in further traffic using Orsett Cock junction or other routes.</p> <ul style="list-style-type: none"> test the Marshfoot Road junction (particularly the priority junction on the east side of the A1089, which is an accident hot spot) Note: Table 1 states that "In the morning peak, eastbound traffic on Marshfoot Road east of the A1089 is predicted to increase by between 101 and 250 PCUs. This would be a rise of between 20% and 40%." This is a significant concern and remains unmitigated by National Highways. test the ASDA junction, given that the junction is operating close to its capacity. <p>The modelling results presented do not provide any</p>			

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		<p>indication of the wider effects of the project and the new link road, the results are only shown as far as Orsett Cock junction on the A13 and Marshfoot Road on the A1089.</p> <p>The traffic flow and modelling information within the Local Refinements consultation materials does not extend to the limits of the Thurrock Borough and so it is not feasible for the Council to take a view on the current impacts of the project on areas such as the Five Bells junction and routes through Corringham, or the residual impacts on the A1014 / A13 The Manorway junction.</p>			
Changes to A13/Orsett Cock Junction Arrangements Overall impacts of LTC	2.1.153	<p>The Council initial review of National Highways' latest strategic modelling (LTAM DCOv2) has determined that there are impacts of the LTC on Thurrock's LRN at:</p> <ul style="list-style-type: none"> A13 Orsett Cock roundabout; significantly increased traffic flow (over +40% 	<p>National Highways have communicated the impacts of the Project in previous consultations. However, we are continuing to actively engage with stakeholders regarding the traffic impacts of the LTC project. As part of this programme National Highways have supplied outputs from our modelling and held appropriate technical meetings, supported by further data assistance where necessary. This will enable a well-founded discussion of our response to these concerns. Our DCO application</p>	<p>Transport Assessment (7.9)</p> <p>Environmental Statement (Vol 6)</p> <p>Wider Network Impacts Management</p>	Matter Not Agreed

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project on local roads		<p>on some roundabout links in AM and PM peak) negatively impacting on the operational performance of the junction (increasing delays and queuing) and reducing capacity for future local plan growth</p> <ul style="list-style-type: none"> • A128 Brentwood Road (and Chadwell Hill through Chadwell St Mary): – significantly increased traffic flow (+20% to 40% on some links in AM peak and over +40% on some links in Inter and PM peaks) with associated safety, noise and air quality impacts on local communities • Marshfoot Road and Marshfoot Priority Junction- significantly increased traffic flow (over +40% on some links in AM and PM peak periods) 	<p>contains the results of further traffic assessments and presents the traffic conditions on the wider road network. National Highways recognises that as a result of the Lower Thames Crossing opening, people will choose to make different journeys. In many places on the network, and within Thurrock, this will lead to beneficial impacts on the network, and in some cases will lead to adverse impacts. Overall, the benefits on the road network outweigh the adverse impacts, and this is reflected in the positive economic benefit of the project within Thurrock. National Highways has identified the adverse impacts on traffic flows across the local road network, and this assessment has been set out in the Transport Assessment and wider Environmental Statement documentation within the DCO application. National Highways has assessed the wider network impacts of the LTC scheme and has considered these against the requirements set out in the National Policy Statement for National Networks (DfT, 2014), and considers that the adverse impacts are acceptable under this policy.</p>	and Monitoring Plan (7.12)	

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		<p>negatively impacting on the operational performance of the junction (increasing delays and queuing). This has also been identified as an existing accident 'hotspot'</p> <ul style="list-style-type: none"> • Buckingham Hill Road (and East Tilbury Road/ Princes Margaret Road Corridor through Linford)- significantly increased traffic flow (over +40% on some links in AM, Inter and PM peaks) with associated safety, noise and air quality impacts on local communities <p>- Muckingford Road (at Chadwell) - significantly increased traffic flow (+10% to +20% on some links in AM peak and +40% on some links in PM peak with associated safety, noise and air quality impacts on local communities; and</p>			

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		Fort Road / Turnpike Lane / Station Road (including through West Tilbury) - increased traffic flow (+40% on some links in PM peak) with associated safety, noise and air quality impacts on local communities.			
Incident Modelling	2.1.154	<p>The effects of incidents on the LTC have not been tested and presented to the Council, to understand the local roads that will be at risk of impact. Mitigation measures should be incorporated to minimise the use of unsuitable routes.</p> <p>A COBALT analysis has been undertaken and the results provided to the Council. The Council understands that this assessment is being updated for the resubmission. Thurrock specific A Roads of the A13 and A1089 reported in the information shared states there is a 16.8% and 8.8% increase in the total number of accidents per vehicle kilometre driven as a result of the Project. This is a key concern with the SERP Vision Zero target.</p>	<p>Safety is our highest priority. The new crossing will be designed and built to the standards recommended today, but we will continue to adapt our plans to incorporate advances in safety design and technology that will come forward in the years ahead to minimise the number and severity of incidents. When incidents do occur, the design includes technology to quickly detect and respond, supplemented by operational resources available attend incidents, minimising the duration and impact.</p> <p>In the event of an incident occurring, the National Highways Regional Operations Centre will liaise with the various emergency services, Traffic Officers, National Highways network maintainers and other network authorities to ensure that any delays are kept to a minimum, that incidents are cleared within National Highways response times, and any diversions are managed in line with agreements with other network authorities. In addition, National Highways will use multiple communications channels to advise motorists of traffic conditions so that that they can adjust their journeys to suit.</p>	<p>Transport Assessment (7.9) CoMMA – Appendix D – Economic Appraisal Report (7.7)</p>	Matter Under Discussion

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		It is understood the scheme would have an impact on the number of incidents recorded in the future, however, mitigation is not proposed on the local roads, given the statement "Local accident rates were derived mainly for the SRN roads within the appraisal area for which local accident rate information could be derived.	It should be noted that the TA reflects the operational modelling that forms the basis of the DCO application. Discussions relating to the operational protocols will continue through until scheme opening and then beyond as National Highways continues its statutory duty to operate the strategic road network. Whilst it is forecast that there is likely to be a small increase in collision numbers as a result of more traffic in the area appraised, there would be a reduction in the collision rate (collisions per vehicle mile travelled) as a result of a managed less congested network. This is further detailed in the Appendix D (Economic Appraisal Report) of the Combined Modelling and Appraisal Report.		
Combined Modelling and Appraisal Report (ComMA)	2.1.155	Thurrock Council have raised the following points further to a review of the ComMA: 1. The justification of the scheme should be explained given its weak economic case. 2. Further details should be provided on how construction disbenefits are calculated and how these have been refined. 3. Further details should be provided on how economic appraisal outputs are consistent with the case for change, including whether the	1. The justification for the project is set out in the Need for the Project. 2. National Highways have revised the construction proposals and undertaken new modelling of the impacts. We have reviewed how we assessed the construction impacts and have revised the approach for the DCO submission. 3. The case for change, including consideration of the scheme objectives, is set out in the Need for the Project. 4. The lowest sector (spatial area) at which the economic benefits are assessed considers Thurrock as a single unit. There is not a more granular breakdown of spatial distribution within Thurrock. 5. National Highways interpret this to be a reference to changing travel demands as a result of increases in the numbers of people working from home and similar	Combined Modelling and Appraisal Report (7.7) Need for the Project (7.1)	Matter Under Discussion

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		<p>scheme objectives have been met.</p> <p>4. The spatial distribution of the benefits attributed to Thurrock should be provided.</p> <p>5. Further consideration should be made of the potential impacts on the scheme VfM of increased participation of activities via digital means.</p> <p>6. Air quality impacts should be assessed for scenarios likely to have worse impacts than those of the core scenario such as the High Growth scenario, instead of assuming them to be equal to those of the core scenario as has been done.</p>	<p>societal changes. We have prepared our assessments to reflect government guidance, and therefore followed the standard approaches set by government. National Highways are aware that there will be future guidance on different scenarios, and once these are released, we will consider the implications of them for the Lower Thames Crossing.</p> <p>6.National Highways has prepared the assessments to reflect government guidance, and therefore followed the standard approaches and conventions that apply for this analysis. This includes the convention of standardising the assessment of the GHG implications using the Core Scenario.</p> <p>National Highways have shared earlier versions of this assessment. Further discussions will be carried out with the Council once the finalised documents have been shared.</p>		
Value for money	2.1.156	<p>Thurrock Council are concerned that there has not been any provision of updated value for money information since the release of the first DCO submission. Increasing scheme costs over the past 4 years and scheme benefits decreasing mean that Thurrock Council are unclear on the benefits of the scheme and do</p>	<p>National Highways consider that the scheme does provide value for money. A ComMA forms part of our DCO application. This includes an Economic Appraisal Report (as Appendix D), reflecting the latest scheme cost estimates and calculated benefits, whilst incorporating updated guidance from the DfT. It also will address the concerns raised by Thurrock Council that the information provided with the previous submission had been superseded.</p>	<p>Combined Modelling and Appraisal Report (7.7) CoMMA Appendix D - Economic Appraisal Report) (7.7)</p>	Matter Not Agreed

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		<p>not consider that it currently provides value for money. Modelling & Appraisal Report (ComMA) so far is now 2 years out-of-date and requests for updates of this document or provision of the OBC have been refused by National Highways (despite two Freedom of Information (Fol) formal requests) leading to inadequate conclusions. Consequently, the Council is undertaking further work on the economic costs of the proposed scheme.</p>			
Limited relief to the Dartford Crossing	2.1.157	Thurrock Council are concerned that the relief to the Dartford Crossing is limited and that there is marginal benefit by 2045.	<p>National Highways' traffic modelling has demonstrated the benefits to Dartford Crossing in the opening year and the design year, as well as the future flows at the Dartford Crossing in the counterfactual scenario (Do Minimum) where Lower Thames Crossing is not built. This information has been shared at consultation and the latest traffic forecasts have been supplied to demonstrate the forecast performance that is set out in the DCO resubmission as part of the Transport Assessment.</p> <p>National Highways' traffic modelling has demonstrated the benefits to Dartford Crossing in the opening year and the design year, as well as the future flows at the Dartford Crossing in the counterfactual scenario (Do Minimum) where Lower Thames Crossing is not built.</p>	Transport Assessment (7.9)	Matter Not Agreed

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			<p>This information has been shared at consultation and the latest traffic forecasts have been supplied to demonstrate the forecast performance that is set out in the DCO resubmission as part of the Transport Assessment.</p> <p>Thurrock Council have made public statements about their interpreted performance of the Dartford crossing. Although the Council have not been clear how they have calculated by the figures in their claims, the source of their data or what year they relate to, it appears they are comparing traffic levels which used the Dartford Crossing in 2016 with those predicted to use the crossing in 2045. In doing so they have assumed there will be no increase in traffic using the Dartford Crossing for nearly 30 years. Traffic levels are already higher than they were in 2016. If the Lower Thames Crossing is not built, in 2045 we expect traffic levels using Dartford to be 13% higher in the AM peak and 27% higher in the PM peak than they were in 2016. Traffic levels are already above the capacity of the Dartford Crossing which carries around 150,000 vehicles a day and 180,000 on some of the busiest days. In the year the road is planned to open, 2030, our traffic modelling shows that traffic levels on the Dartford Crossing are predicted on average to fall by around 19%, with a 17% reduction in the AM peak and a 21% reduction in the PM peak. Even after the road has been open for 15 years, traffic levels using the Dartford Crossing are still predicted to be down by 14% on average and by 9% in the AM peak and 17% in the PM peak. These figures compare predicted traffic levels in 2030 and 2045, they do not compare traffic levels with 2016. National Highways have never claimed traffic</p>		

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			levels using the Dartford Crossing to still be the same in 2045 as they were in 2016, however, it appears that is what Thurrock Council are seeking to claim.		
Wider Networks Impacts					
Consideration of Wider Network Impacts	2.1.158	<p>The Council has concerns over the inadequate recognition of the likely impacts on the wider transport network in Thurrock and the lack of commitment to monitor and then mitigate effects on the wider network or junctions and local roads within Thurrock.</p> <p>1. If improvements/ mitigation are required then National Highways should legally commit to securing these measures and providing the relevant funding (possibly through suitable agreements/ requirements).</p> <p>2. There is no commitment to mitigate the known impacts on the LRN. National Highways does not provide any reassurance to LAs and the</p>	<p>National Highways recognises that as a result of the Lower Thames Crossing opening, people will choose to make different journeys. In many places on the network, and within Thurrock, this will lead to beneficial impacts on the network, and in some cases will lead to adverse impacts. Overall, the benefits on the road network outweigh the adverse impacts, and this is reflected in the positive economic benefit of the project within Thurrock. National Highways has identified the adverse impacts on traffic flows across the local road network, and this assessment is set out in the Transport Assessment and wider Environmental Statement documentation within the DCO submission. National Highways has assessed the wider network impacts of the LTC scheme and has considered these against the requirements set out in the National Policy Statement for National Networks (DfT, 2014), and considers that the adverse impacts are acceptable under this policy.</p> <p>The Project is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of</p>	<p>Transport Assessment (7.9)</p> <p>Environmental Statement (Vol 6)</p> <p>Wider Network Impacts Management and Monitoring Plan (7.12)</p>	Matter Not Agreed

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		<p>community that LTC's impacts on the wider road network will be mitigated.</p> <p>3. National Highways should identify impacts, including those on the LRN, as part of the evidence base for the DCOv2 Examination and not defer this to a later date, at which stage the local authority may be little more than a consultee</p>	<p>traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>National Highways is obligated to work with local authorities and others to align national and local plans and investments, balance national and local needs and support better end to end journeys for road users (National Highways License from DFT para 5.1.9). National Highways will continue to deliver against this obligation in its collaborative work with local authorities.</p> <p>The Project position is set out in the Wider Network Impacts Management and Monitoring Plan (WNIMMP). An updated WNIMMP is included in the application, providing information about the proposed traffic monitoring.</p> <p>National Highways has provided a briefing on the changes made to the WNIMMP since a draft version was shared in the July 2021 Community Impacts Consultation.</p>		
Roads and junctions of concern	2.1.159	<p>Thurrock Council have identified that there may be adverse impacts at a number of locations including the following:</p> <ol style="list-style-type: none"> 1) A13 interchange and Orsett Cock, 2) The Manorway roundabout, 3) ASDA roundabout, 	<p>National Highways continues to actively engage with stakeholders regarding the traffic impacts of the LTC project. As part of this programme we have supplied outputs from our modelling and held appropriate technical meetings, supported by further data assistance where necessary. The DCO application will contain the results of the traffic assessments and present the traffic conditions on the wider road network. National Highways considered comments when preparing the DCO application documents for submission to ensure</p>	<p>Wider Network Impacts Management and Monitoring Plan (7.12) Draft Development Consent Order (3.1)</p>	Matter Not Agreed

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		<p>4) Daneholes roundabout and 5) Marshfoot Road junction. 6) A1013 (Daneholes roundabout), B149, Marshfoot Road. 7) Marshfoot priority junction (with slips to A1089). 8) Brentwood Road and Chadwell Hill, Chadwell St Mary. 9) A1012/Lodge Lane/Long Lane Roundabout. 10) Stifford Clays Road. 11) A13/A126 eastbound off slip. 12) M25 J30 - Mardyke Interchange. 13) Devonshire Road/A1012/Hogg Lane.</p> <p>Thurrock Council is of the view that locally validated junction modelling should be carried out at key pressure points on the network, using accurate baseline traffic data for validation. Where this work indicates further mitigation is required, this should be secured through the DCO or</p>	<p>confidence can be provided about the nature of future traffic conditions.</p> <p>National Highways is working with Thurrock Council to conduct a series of workshops and modelling exercises to interrogate the impacts of the project on the wider road network in more detail, led by the outputs from the main scheme modelling which has been shared with authorities. National Highways is currently in joint discussions with relevant authorities in accordance with license obligations to work with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users.</p> <p>National Highways have been undertaking local junction modelling on several junctions on the Thurrock road network (such as Orsett Cock and Manorway), with the model outputs being shared through a series of collaborative workshops and documents.</p> <p>National Highways' position on the traffic impacts on the wider road network is set out above.</p>		

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		through a separate legal agreement. This should inform mitigation and the Wider Network Impacts Management and Monitoring Plan, which the Council would seek to review prior to DCO submission.			
Impact on Orsett Village and Rat running	2.1.160	There is concern that the modelling demonstrates an increase in traffic through Orsett village and Rectory Road. Traffic levels and delays at Orsett Cock are also likely to be underestimated. Traffic management is also necessary in Orsett.	<p>National Highways are continuing to actively engage with relevant authorities regarding the traffic impacts of the LTC project. As part of this programme we have supplied outputs from our modelling and held appropriate technical meetings, supported by further data assistance where necessary.</p> <p>During the continual development of the LTAM the location of a zone connector near the Orsett Cock junction was adjusted. This resulted in minimal differences on forecast flows on roads in the area (including Rectory Road). The base year model was recently re-validated for 2016 to make use of an additional traffic count in the area provided by Thurrock Council. This model validation includes the new location of the zone connector and is reported in the Transport Modelling Package, as part of our DCO submission.</p> <p>National Highways recognise the increasing focus on development in this area will continue to put pressure on the local road network. As a result National Highways will continue to discuss connections onto the Orsett Cock roundabout during the detailed design of the LTC. In addition, and separately from the LTC DCO National Highways will discuss the proposed trunking order for the</p>	N/A	Matter Under Discussion

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			A13 in this area. Impacts on Orsett village and the potential for rat running will form part of these discussions.		
Impacts at Daneholes Roundabout and Daneholes Roundabout Enhancement	2.1.161	Rat-running should be monitored including Daneholes roundabout and routes via Chadwell St Mary. National Highways traffic modelling indicates there could be additional flows along the A1013 leading to this junction and this could impact upon congestion. This is an important route for buses leading into Grays and so it is proposed that a bus lane is added (as an outside lane) to the A1013 approach. The National Highways traffic modelling indicates there could be additional flows along the A1013 leading to this junction and this could impact upon congestion. This is an important route for buses leading into Grays and so it is proposed that a bus lane is added (as an outside lane) to the A1013 approach. However, review of latest LTAM model underway to determine if	Thurrock Council are currently undertaking a review of the latest modelling to understand the impact at this junction. If it is appropriate that the changing levels of traffic warrant further consideration at this location, National Highways have agreed to fund a study into potential interventions, allowing them to be developed and appraised at SOBC level, as part of National Highways duty to collaborate with Local Authorities.	N/A	Matter Under Discussion

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		further work or an additional bus lane is required.			
Traffic Management Measures in Orsett, Horndon and Chadwell	2.1.162	Mitigation for additional traffic movements on local roads through local settlements, including HGV movements, to avoid further diversion of traffic on other local routes.	National Highways acknowledge that there are adverse impacts on selected local roads, but have demonstrated that the benefits from improved traffic flows across Thurrock outweigh the adverse impacts. This is set out in the approach to Wider Network Impacts. We are continuing to actively engage with stakeholders regarding the traffic impacts of the LTC project. As part of this programme we have supplied outputs from our modelling and held appropriate technical meetings, supported by further data assistance where necessary. This will subsequently enable a well-founded discussion of our response to these concerns. Our DCO application contains the results of further traffic assessments and presents the traffic conditions on the wider road network. National Highways is also engaging in discussions about the construction phase impacts at these locations, and has set out management processes in the oTMPfC.	Transport Assessment (7.9)	Matter Under Discussion
Specific Comments on Wider Network Impact Monitoring and Mitigation Plan (WNIMMP)	2.1.163	1.The document should recognise interventions that may be required across a geographic area rather than at specific junctions only 2. The timeframe for delivering interventions required to mitigate impacts would be 5 – 10 years following opening due to need to undertake traffic monitoring (one year and five	1. The updated WNIMMP is based on the traffic modelling findings presented within the Transport Assessment which has identified a number of areas (some of which are already subject to congestion or operating near capacity) where the forecast changes in traffic flows create conditions that could cause further capacity effects on the wider road network. National Highways has assessed the wider network impacts of the LTC scheme and has considered these against the requirements set out in the National Policy Statement for National Networks (DfT, 2014), and considers that the	Wider Network Impacts Management and Monitoring Plan (7.12)	Matter Under Discussion

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		<p>year) and subsequent suitability assessments. The WNIMMP should include scope for fast-track scheme development and/or delivery of early interventions (after year one monitoring).</p> <p>3.A commitment to funding the work required to identify, assess and develop business cases etc for interventions should also be provided</p> <p>4. WNIMMP in Table 2.1 should include local road network interventions in the Orsett Village, Rectory Road and Baker Street area and Chadwell St Mary area identified by the Council.</p>	<p>adverse impacts are acceptable under this policy. Nonetheless, National Highways understands the importance of its statutory obligations as a strategic highway company, and is continuing engagement with all the relevant local highways authorities. This has been focused around working with them in a collaborative manner on the development of their local plans, effective management of the strategic road network and management of the interfaces between the strategic road network and the local road network in their areas.</p> <p>2. As noted above, whilst interventions for the wider network impacts identified are not incorporated in the DCO submission, National Highways is cognisant of its wider responsibility, and has been working collaboratively with the local highway authorities to consider the localised capacity or congestion issues. National Highways will continue to provide support to help understand what projects local highway authorities may wish to develop and to submit for funding consideration, and has participated in some early studies which have been progressed in parallel to the ongoing LTC development work, to identify potential solutions to form the basis of bids for funding. Assessment and prioritisation of those schemes must be properly dealt with through the relevant investment approval processes, including any intervention that requires obtaining its own consent (e.g. DCO).</p> <p>3. Following on from above, National Highways will continue to help define the funding opportunities available to Local Authorities for different types of road investment.</p>		

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			4. In the event that the traffic impact monitoring and the review of its findings identifies that future investment would be suitable, National Highways would work in partnership with the relevant local highway authorities to provide support as part of National Highways' statutory obligations.		
Monitoring for the Traffic Monitoring Scheme	2.1.164	<p>Further work is required by National Highways to select and agree the locations to be assessed in the traffic impact monitoring scheme submitted for approval under the traffic monitoring requirement of Schedule 2 to the dDCO, in particular on local roads.</p> <p>1. This includes along the A1013, B149, and at Daneholes Roundabout and on local roads through Chadwell St Mary and Orsett Village.</p> <p>2. Junctions such as The Manorway roundabout, Orsett Cock junction, ASDA roundabout and Marshfoot priority junction should also be monitored.</p> <p>3. Reliability of journey times, congestion, incidents, noise</p>	<p>1,2. Monitoring Locations</p> <p>At a meeting on the 27th April 2022, National Highways explained its approach to Wider Network concerns from Local Authorities before and after the crossing opens. It was explained that National Highways has assessed the wider network impacts of the LTC scheme and has considered these against the requirements set out in the National Policy Statement for National Networks (DfT, 2014), and considers that the adverse transport impacts are acceptable under this policy. Further information on policy compliance can be found within the Transport Assessment. As such, National Highways is not committing to any direct additional funding for interventions on the wider network through the DCO.</p> <p>The Project is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p>	Wider Network Impacts Management and Monitoring Plan (7.12)	Matter Under Discussion

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		<p>and air quality are also important to monitor</p> <p>The WNIMMP needs to state the exact level of change required for triggering of any additional mitigation</p>	<p>An updated WNIMMP is included in the application, providing information about the proposed traffic monitoring.</p> <p>National Highways has also provided a briefing on the changes made to the WNIMMP since a draft version was shared in the July 2021 Community Impacts Consultation.</p> <p>The locations to be monitored under the monitoring scheme would be</p> <ul style="list-style-type: none"> • those set out below as part of the Management and Monitoring Plan; and • those selected following engagement with the relevant local highway authorities, before formally consulting them during the Requirement 14 approval process. <p>With regards to the first point, National Highways has identified locations on the SRN that are geographically close to the A122 junctions. In addition, as one of the principal purposes of the SRN is to enable journeys between major ports, links to the two ports located closest to the A122 have been included. The identified junctions constitute the nearest and second nearest junctions on the SRN and MRN located adjacent to the junctions with the A122, the A2, the A13 and the M25. In addition to the monitoring locations identified by National Highways above, the monitoring locations proposed in response to the previous Community Impacts Consultation and You Said We Did (YSWD) Consultation would also be included.</p>		

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			<p>With regards to the second point, additional monitoring locations proposed through local highway authority engagement (before formal consultation on the Requirement 14 approval process) would be considered with proposals put forward during the formal consultation on the monitoring scheme.</p> <p>3. Monitoring criteria</p> <p>The document states that monitoring would be undertaken using standard methodologies available at the time of data collection. This may include automatic traffic counters (ATCs), video surveys and/or Global Positioning System (GPS) data. Traffic monitoring would be undertaken to identify localised delays and/or any worsening of network performance through the analysis of traffic flows/change in flows, traffic routes, journey times/journey time reliability, junction performance, traffic composition and road safety. Detailed development of the methodology to be employed within the monitoring scheme will be a key part of the consultation undertaken prior to the submission to Secretary of State for approval. The project position on operational air quality and noise monitoring is presented under issue HATCH M4 (operational air quality and noise monitoring).</p> <p>Trigger for any additional mitigation</p> <p>Trigger points are not being set in the WNIMMP as it's the Project position that no interventions are required to be made by the Project on wider road network. However, data collected by the monitoring scheme would be used by local authorities as evidence within their intervention case making.</p>		

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			<p>The traffic impact monitoring scheme will be secured in Schedule 2 of the draft Development Consent Order and would require approval by the Secretary of State, after consultation with relevant local highway authorities, which would begin one year before the tunnel area opens.</p> <p>Further discussions will be carried out with the Council after the finalised WNIMMP has been shared with the DCO application.</p>		
Delivering Tilbury Link Road (TLR) as part of the LTC scheme	2.1.165	<p>The Council would like the TLR to be delivered as part of LTC and are opposed to its removal from the LTC proposals. Its inclusion would support the delivery of Thames Freeport, the planned growth of the Port of Tilbury, the expansion of DP World, the delivery of Thurrock's emerging Local Plan's employment and housing growth and avoiding unnecessary impacts of HGVs accessing LTC on local roads and communities.</p> <p>Recent correspondence with National Highways casts serious doubts over the eligibility of the TLR for funding via any future RIS3 programme, therefore the</p>	<p>The Tilbury Link Road has been identified in the RIS2 as part of the RIS3 pipeline of projects. During the review of the project undertaken when the Thames Freeport was designated, National Highways sought direction and received instruction from DfT and Department for Levelling up, Housing and Communities (DLUHC) that the Tilbury Link Road should be progressed through a separate consenting process to the Lower Thames Crossing.</p> <p>The revised design at Tilbury Fields provides an operational access, with no access for public traffic on or off the LTC at this location. This operations and emergency access has not been designed specifically for any particular future connection into the local road network, however if the Local Authority or a third party stakeholder is considering any future development they would need to liaise with National Highways Spatial Planning to develop their proposals. Any new road connecting to the LTC at this point would have to follow the relevant planning process at the appropriate time.</p>	N/A	Matter Not Agreed

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		<p>Council believes that the most efficient way of delivering the TLR is as part of the LTC scheme.</p> <p>1. The Council believe adding this to the scheme now would take approx. 12-18 months more than a LTC only DCO. National Highways have suggested that a combined LTC / TLR DCO would add 4 years to the delivery programme making it an unacceptable option.</p> <p>2. If TLR cannot be added to the LTC DCO, it is essential to accelerate its delivery using alternative funding and delivery mechanisms (before RIS3, in line with the delivery of LTC). There must be a firm legal commitment from National Highways/DfT for its provision.</p>	<p>National Highways disagree with the Council's statement on development timeframes and consider that the proposed change would take substantially longer. While National Highways are continuing to develop the Tilbury Link Road, it is not possible to bypass the government investment decision process by committing to funding for the consenting and construction of the Tilbury Link Road within the LTC DCO.</p>		
Evidence for removal of TLR from LTC proposals	2.1.166	<p>Though originally included in the DfT's non-statutory consultation (2016) and HE Scoping Report for the LTC scheme (2017), the TLR was dropped from LTC proposals.</p>	<p>The TLR has been identified in the RIS2 as part of the RIS3 pipeline of projects. During the review of the project undertaken when the Thames Freeport was designated, National Highways sought direction and received instruction from DfT and DLUHC that the Tilbury Link</p>	N/A	Matter Not Agreed

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		The reasons for not including the TLR were set out in the 'Approach to Design, Construction and Operation' in July 2018, which have been countered by the Council in the formal CIC response. These are not considered valid or adequate by the Council but seem to have guided National Highways' approach since that time, even though some reasons are now out of date.	Road should be delivered through a separate consenting process to the Lower Thames Crossing.		
Modelling the TLR link	2.1.167	National Highways has ruled out delivering TLR as part of the LTC DCO application but the supporting modelling work from LTAM associated with any options appraisal for the TLR has been provided to the Council. The Council is using the LTAM model runs provided by LTC to analyse the provision of TLR and provision/adequacy of the Tilbury junction for future needs.	Fortnightly traffic modelling sessions with Thurrock Council are ongoing. LTAM model runs with the Tilbury Link Road have recently been run with the outputs shared with the Council. National Highways continue to engage with Thurrock Council on the Tilbury Link Road project, which is being considered separately to the Lower Thames Crossing. Until such a time as a preferred route is determined for the Tilbury Link Road project, it is not possible for National Highways to determine whether changes would be required to the operational access provided at the north portal to connect.	N/A	Matter Under Discussion
Potential route of the TLR	2.1.168	It is clear that access to the Port of Tilbury, once the LTC scheme is completed and	The Port of Tilbury benefits from the provision of direct new free-flowing connections from the A1089 northbound onto the Lower Thames Crossing, from where traffic can	Transport Assessment (7.9)	Matter Not Agreed

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and impacts		operational, will be circuitous from the LTC north and southbound. The local A roads and unclassified roads/junctions are not designed to accommodate these increases in traffic and/or HGV traffic. There are safety, air quality and noise concerns relating to increasing traffic and HGVs, particularly related to the schools, residential dwellings, and local bus services along these routes.	<p>travel on to the M25 at junction 29 and the A2 / M2 corridor. This would reduce journey times for traffic using these routes. While no new direct and free-flowing connectivity is provided for traffic heading from the M25 southbound towards to Port of Tilbury, the relief to the M25 at junction 30 and the reduction of traffic on the A13 to the west of the Lower Thames Crossing means that journey times along this route would also decrease and remain the shorter and faster route.</p> <p>Recognising the concerns raised about connectivity by Thurrock Council, National Highways modified the proposed connectivity at the A13 junction, rerouting traffic off the A1013 and onto the A1089, reducing traffic flows along the roads of concern. This change was made and set out at the Local Refinement Consultation.</p> <p>The Transport Assessment provides an assessment of the Project and its impacts on the local A roads surrounding the Project. The impacts arising from the Project (including safety, air quality, noise, impacts on receptors, etc.) have been assessed and addressed through the Environmental Statement.</p>	Environmental Statement (6.3)	
Socio-Economics					
Wider Socio Economic Impacts	2.1.169	The wider impact on Thurrock's socio-economic mix has not been considered by National Highways, for example the effect on housing delivery and how a Lower Thames Crossing will impact	The Combined Modelling and Assessment Report (CoMMA Appendix D - Economic Appraisal Report) details the benefits / disbenefits (costs) of the Project in monetized terms, borough-by-borough. This considers the changes in journey times and costs for all traffic in the area, including for people who will not use the crossing but whose journeys will be affected by new traffic patterns. The report clearly shows that Thurrock is	Need for the Project (7.1) Combined Modelling and Assessment Report (CoMMA Appendix D -	Matter Not Agreed

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		<p>on future growth and investment.</p> <p>1. The Council requests that an additional and standalone socio-economic study is undertaken to assess in detail the impact the Lower Thames Crossing would have on the Borough.</p> <p>2. This should also take into consideration the wider economic benefits and especially the disbenefits.</p>	<p>the greatest net beneficiary from the Project (compared to other host and neighbouring authorities), as Thurrock gets the most significant benefits from the Project in terms of better connectivity, journey time and reliability, translating into economic benefits. The report also includes a Level 3 Wider Economic Impacts Report (beyond the Benefit Cost Ratio for the Project). The report also provides a quantitative and qualitative analysis of business clusters that currently exist in the Lower Thames area, and how the Project may impact these clusters and encourage the development of emerging clusters.</p> <p>Road developments are strictly guided by TAG (Transport Analysis Guidance) which dictates what can be claimed as benefits / disbenefits (costs) of road developments in monetised forms. TAG doesn't allow a road project to monetise housing developments that may be unlocked by the road project and therefore Lower Thames Crossing can't include housing boost in Thurrock as a benefit that can be monetised.</p> <p>That said, the likely effects of the Project on development land are also assessed in ES Chapter 13: Population and Human Health and there would not be a significant impact. The DCO submission considers the adopted and emerging local plan policies in Local Authorities with advanced emerging Local Plans to evidence how the project interacts with ambitions for future growth.</p> <p>The A122 Lower Thames Crossing would not prevent strategic policy-making authorities positively planning for housing growth. The construction of the project provides decision makers and developers with options with</p>	<p>Economic Appraisal Report) (7.7)</p> <p>Combined Modelling and Assessment Report - Appendix D - Level 3 Wider Economic Impacts Report (7.7)</p> <p>ES Chapter 13 - Population and Human Health (6.1)</p>	

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			respect to the development of land in proximity to the route. The additional capacity in the highway network may also assist local authorities in finding suitable land for new housing in their area. However, National Highways cannot advise how or where new housing should be allocated.		
Council-led local Labour and Business Team (LLBT)	2.1.170	Thurrock Council would like a dedicated council led labour and business team. This team would have responsibility for ensuring the residents and businesses of the borough secured economic benefits through working closely with LTC/National Highways, contractors and sub-contractors	<p>National Highways will have its own LTC Skills, Education and Employment (SEE) resources who would create new jobs and business opportunities for local people, fill construction vacancies, develop a new specialist education offer, train and upskill local communities and localise the supply chain and small and medium-sized enterprises (SME).</p> <p>The Project will employ six posts, as part of its team during construction phase. These roles include (but are not limited to):</p> <ol style="list-style-type: none"> SEE Lead: Responsible for the overall SEE Strategy and SEE development plans; SEE Manager: Responsible for the SEE advisors and SEE communications; SME/Supply Chain Lead: Responsible for engagement with the supply chain and SMEs; 3 x SEE Co-Ordinators: Each of the Main Works Contractors will have a minimum of one SEE Co-ordinator in order to produce the Employment and Skills Plans to deliver SEE targets. <p>Additionally there are 5 pre-construction SEE roles, most of which are already in post</p>	Section 106 Agreements (7.3)	Matter Not Agreed

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			<p>1. SEE Lead: Responsible for the overall SEE Strategy and SEE Development plan</p> <p>2. SEE Manager: Responsible for the SEE Advisors and SEE Communications</p> <p>3. SEE Advisor North: Responsible for building partnerships with existing providers within the North to increase local job opportunities and promote/enhance the education agenda</p> <p>4. SEE Advisor South: Responsible for building partnerships with existing providers within the South to increase local job opportunities and promote/enhance the education agenda</p> <p>5. SEE Apprentice (expected to start in Sept 2023)</p> <p>Thurrock Council disagree with the distribution of resources by LTC and would like a dedicated officer for Thurrock Council.</p>		
Targets for local labour during construction	2.1.171	Thurrock Council want National Highways to establish clear targets for engaging local labour and apprentices during the construction of the LTC scheme	<p>National Highways will undertake best endeavours to implement the principles and measures set out within the Skills, Education and Employment Strategy which sets out how measures would enable the skills, education and employment opportunities associated with the Project to be realised.</p> <p>To achieve the skills legacy, National Highways shall require its contractors and supply chain partners to use best endeavours to:</p> <p>Achieve a target of at least 20% of employees to be local people who usually reside within Gravesham, Medway, Thurrock, Havering and Brentwood immediately prior to</p>	Section 106 Agreements (7.3)	Matter Under Discussion

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			<p>obtaining work on the Project, and continue to do so on starting work on the Project;</p> <p>Achieve a target of at least 45% of employees to be within 20 miles of the Project or associated works (including employees within the boroughs in (a)</p> <p>Achieve the minimum targets set out below</p> <ul style="list-style-type: none"> • Training for local communities – 350 people • Sector skill qualification – 500 people • Apprentices – 137 people • Graduates/trainees – 291 people • Newly employed - 500 people • Pre-employment programmes – 650 people • Education engagement – 5,000 hours • Support to educators – 2,000 hours • Work placements – 470 people • SME spend - £1 in every £3 • Business upskilling - 1,000 businesses • Supply chain payment - Within maximum of 30 days <p>The targets presented above have been benchmarked, and National Highways have presented the work and the calculations done to reach them to the Skills and Employment Working Group on 16th Sept 2022.</p> <p>The contractors will be required to develop Employment and Skills Plans which aligns with the overarching SEE Strategy. All contractors and supply chain partners will be required to undertake regular reporting to monitor progress against the target outcomes during the</p>		

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			<p>construction of the Project. These plans will be reviewed annually. The findings from this reporting will be discussed in a quarterly SEE Forum and released in an annual outcomes report. The data will be reviewed at Project, contract and local authority levels.</p> <p>Thurrock Council disagree with the definition of the local area and would like 1) to only include Thurrock, LB Havering and Gravesham. The Council would also like to see more ambitious targets to be pursued by the Project</p>		
Council-led Community and Public Health Team (CPHT):	2.1.172	Thurrock Council would like a resource to be given to support the Local Community and Public Health Team within Thurrock Council, who would have the responsibility to work with the local community and ensure local people experience positive social and economic benefits as a result of the LTC. This would encompass the management or oversight of delivering agreed community mitigations, such as a community-led programmes to build cohesion	National Highways is willing to fund 2 x Full Time Equivalent roles, focussed on supporting the EHO, coordinating the community liaison workstream and to support the skills/business advisor as necessary. This will be secured via the S106 Agreement. Further discussions are ongoing re scope of these roles, their duration and associated costs.	Section 106 Agreements (7.3)	Matter Under Discussion
Transport Network Management and Developm	2.1.173	Thurrock Council would like an additional resource provision to cover the requirements to manage and develop the transport network in response	National Highways is willing to offer 1 x Full Time Equivalent role focussed on supporting the network management team. This will be secured via the S106 Agreement. Further discussions are ongoing re the duration of the role and associated costs.	Section 106 Agreements (7.3)	Matter Under Discussion

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ent Resource (TNMDR)		to the impacts of the LTC construction. It is understood that this item has been agreed to by National Highways, however, no evidence of this has yet been provided.			
Compensation for properties and businesses Business rates holidays for firms affected during construction	2.1.174	Businesses located in close proximity to construction sites and therefore most affected by the LTC scheme during construction should receive a temporary Business Rates reduction or holiday. National Highways should also provide more clarity on their policy for compensation for properties and businesses that could be adversely affected during construction works.	<p>Compensation for properties and businesses</p> <p>National Highways has discussed the existing mechanisms in the statutory provisions which cover compensation for properties or businesses that have been adversely affected by the construction works carried out for our scheme. The potentially affected parties may be able to claim compensation under section 152 of the Planning Act 2008 or under section 10 of the Compulsory Purchase Act 1965. This approach is also summarised in the National Highways document below (in page 13)</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/645165/Your_property_and_our_road_proposals.pdf</p>	N/A	Matter Agreed*

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			<p>Business Rate Holidays/Business Rate Income</p> <p>It should be noted that only the Government can grant business rate holidays and there is nothing under the compensation code which would allow the Project to provide something similar. Additionally, no other infrastructure project has provided business rate holidays. It is also worth noting that temporary infrastructure, such as compound sites etc will be rateable and will therefore provide an additional revenue for local authorities during the construction programme which could off-set any potential losses. The Council have done their own detailed analysis of this principle and agree with the statement above.</p> <p>Thurrock Council have seen the Project position set out above and marked the matter agreed.</p>		
Alignment with Thurrock's Social Value Framework Ring fencing social value	2.1.175	Ensure LTC procurement meets with requirements of the Council commissioning, procurement and grant funding strategy and to include greater priority to be given to Thurrock council as a Level 2 Authority within the DLUHC Levelling Up White Paper beneficiary and recipient of greater disbenefits.	<p>Alignment with Thurrock's Social Value Framework</p> <p>National Highways are required to procure in accordance with Procurement Policy Note (PPN) 06/20, which sets out how the award of central government contracts should place a priority on social value. National Highways is committed to ensuring that delivery of the scheme maximises positive outcomes for the local economy, communities and the environment. LTC's baseline contract requirements contains a number of measures which support this including apprenticeships, workless job starts and work placements. As confirmed by the Council's email of 19th July, the approach adopted by the Thurrock Social Value Framework (SVF) is broadly aligned with PPN 06/20.</p> <p>Ring Fencing Social Value</p>	Section 106 Agreements (7.3) Carbon and Energy Management Plan (7.19)	Matter Not Agreed

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			<p>National Highways are of the position that we should not direct the areas in which the social value spend should occur, and so have not provided for this within the dDCO or other Application documents. Having a predetermined and specific set of criteria would likely affect the spending profile, resulting in prioritisation of spend in areas that don't necessarily deliver the best value outcomes. For example, there could be a direction of spending into Priority 1 areas, at the expense of Priority 2 areas.</p> <p>We note that the levelling up guidance does provide some useful metrics for demonstrating why social value spend might provide benefits in terms of filling the skills gap etc., as metrics in particular around skills and employment are some of the key indicators under the government policy. We therefore propose to draw the attention of the Tenderers to this government guidance, not on the basis that there will be a requirement to prioritise investment in a specific way, but that it provides useful information to influence their consideration about how their social value propositions can align with priorities for Government spending through the levelling up programme.</p> <p>The Project contains a number of commitments that addresses overall social value for this project by:</p> <ul style="list-style-type: none"> • Helping local communities by committing to targets for employment, re-training, apprenticeships, work placements, education engagement and other return-to-work opportunities • Increasing supply chain resilience and capacity, by creating a diverse local supply chain, upskilling 		

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			<p>local businesses and maximising spend with SMEs</p> <ul style="list-style-type: none"> Fighting climate change, by delivering additional environmental benefits, increasing biodiversity and reducing carbon <p>Therefore whilst National Highways cannot ring fence social value for Thurrock Council in our DCO application, our proposed approach does, whilst seeking to maximise social value for the country as a whole, very specifically focus on achieving specific local outcomes as a core part of that wider objective.</p>		
Use of Community Liaison Officers Roles and Responsibilities of the Community Liaison Officers	2.1.176	Support to enable community engagement during the construction of the LTC scheme	<p>The discussion on this matter was divided into two parts</p> <p>Use of Community Liaison Officers</p> <p>The Project is committed to enable community engagement during the construction phase of the scheme. The commitment to a team of Community Liaison Officers is in the CoCP.</p> <p>Roles and Responsibilities of the Community Liaison Officers</p> <p>The CoCP also contains the commitment to the roles and responsibilities of these Community Liaison Officers as outlined below</p> <ol style="list-style-type: none"> Deliver the Community Engagement Plan Engage with those who may be affected by construction impacts, including local residents, community groups and local businesses. Provide information on the construction process to local stakeholders and shall be the first line of response to resolve issues of concern. 	'Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)	Matter Agreed*

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			<p>4. In the case of emergency work, the Community Liaison Officers will engage with and advise the local authority and local residents of relevant information as soon as reasonably practicable.</p> <p>5. The Community Liaison Officers will ensure compliance with community engagement commitments, as defined in the Register for Environmental Actions and Commitments and Code of Construction Practice</p> <p>6. The Community Liaison Officers will maintain a correspondence register</p> <p>Thurrock Council have seen the commitments set out above and marked the matter agreed.</p>		
Scale of the Community Fund (North)	2.1.177	The Council are of the opinion that the scale of the proposed LTC Community Fund remains very modest in comparison with all the available benchmark information for similar DCOs. Securing an appropriately sized community fund is of critical importance and the Council would like LTC to share the results of its benchmarking exercise and do further work to increase the quantum of the fund.	<p>National Highways will provide two community funds. The two funds of £1.26 million (£180,000 per year for seven years) and £0.63 million (£90,000 per year for seven years) (indexed) are to be administered and assured by the Essex Community Foundation and Kent Community Foundation respectively.</p> <p>Relationship to Designated Funds Programme</p> <p>It should be noted that National Highways has now allocated over £40million of Designated Funds that can be awarded to local organisations to deliver projects that:</p> <ul style="list-style-type: none"> • Enhance the environment; • Protect and conserve heritage assets; • Promote active travel; and • Invest in local communities <p>Full funding criteria can be found online and has been shared with the LAs</p>	Section 106 Agreements (7.3) Benefits and Outcomes Document (7.18)	Matter Not Agreed

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			<p>Further funding will be allocated to LTC as soon as plans to spend this have been developed in partnership with local authorities and other delivery bodies.</p> <p>Benchmarking exercise against other DCOs National Highways has completed a benchmarking exercise for developing the size of the Community Fund by comparing with projects like A14, HS2, Thames Tideway Tunnel, A428 and A303. This exercise was shared with stakeholders in June 2021 and presented again on 29th June 2022. The funds offered by the majority of the projects above were designed to mitigate against certain impacts that weren't being mitigated by the measures in the DCO itself. In addition, National Highways has made a pot of Designated Funds available for the route of LTC, which HS2 and Hinkley didn't have.</p> <p>The size of Community Funds isn't determined by the overall cost of the project but to count in the planning balance it has to be related to (residual) impacts of the scheme. These are hard to compare across schemes because:</p> <ul style="list-style-type: none"> • different schemes have different residual impacts and different ways of dealing with them (E.g. for tackling unanticipated impacts, Designated Funds may be the most suitable) • they are clearly different for linear projects (A14, Thames Tideway Tunnel) compared to single site ones (nuclear power stations). • different lengths of construction period • different numbers of people affected 		

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			Our proposal is proportionate and part of a suite of investment either as part of the DCO (under proposed mitigation) or wider Designated Fund Programme, that will benefit communities and the environment beyond the benefits of the improved transport connectivity itself. The Community Fund is therefore aimed at smaller community-led initiatives, that is not considered mitigation for the Project, and do not meet these pre-set criteria for Designated Funds.		
Fund Allocation Ring fencing the Community Fund by Local Authority Area	2.1.178	The Council would like further information on how these funds will be allocated. Furthermore, the Council support the ring-fencing/apportioning the Fund by local authority area. The Council's view is that the Community Fund must be designed from the outset to benefit those areas and communities most impacted by the LTC works and subsequent operation, especially giving priority to the Level 1 and Level 2 Authorities within the DLUHC Levelling Up White Paper beneficiaries.	Funding allocation has been apportioned based on the number of wards considered likely to experience the most change during the construction of the Lower Thames Crossing, and where the Environmental Impact Assessment and other assessment documents within the DCO application have identified risks of significant adverse effects across more than one environmental topic area during construction. National Highways agree with the ring-fencing approach proposed by the Council. For the Community Fund (North) - Up to £180,000 is to be made available annually across the six years of construction and one year post construction as follows: <ul style="list-style-type: none"> • £135,000 (75%) to community-led initiatives within Thurrock • £27,000 (15%) to community-led initiatives within Havering • £18,000 (10%) to community-led initiatives within Brentwood Each year, any unawarded funds will be transferred to the following year, and in the final quarter of each	Section 106 Agreements (7.3)	Matter Under Discussion

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			<p>financial year, up to 10% of the following year's funding can be brought forward subject to National Highways approval.</p> <p>Further information on fund allocation is presented in the S106 Heads of Terms for the Community Fund and discussions are ongoing.</p>		
Grant amount, key themes and detailed funding criteria covered by the Community Fund	2.1.179	<p>The Council would like further clarification on the grant amount and key themes covered by the Community Fund.</p> <p>The Council would also like more detail on what activities are likely to be covered by each theme and how detailed criteria would be developed. The Council would want to be able to reassure local stakeholders that the themes will be broad in their remit and will not be overly restrictive in their reach, but yet target appropriate projects</p>	<p>Grants of up to £10,000 (with grants of up to £25,000 consider for exceptional projects) would be awarded to eligible community-led initiatives across four themes:</p> <ol style="list-style-type: none"> 1. Mental health and wellbeing; 2. Local skills and employment support; 3. Connecting communities; and 4. Environment. <p>More detail on what activities are likely to be covered by each theme is currently being prepared by National Highways and will be circulated shortly.</p> <p>The detailed criteria for the Community Funds is to be developed democratically in partnership with the panel and local authorities ahead of the funds becoming available. The criteria is eligible to be reviewed annually at the start of each funding cycle. LTC have proposed some key principles to guide the development of detailed criteria and ensure that there is consistency across the funds.</p> <p>Further details of these issues are presented in detail in the S106 Heads of Terms for the Community Fund and discussions are ongoing.</p>	Section 106 Agreements (7.3)	Matter Under Discussion

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Other governance arrangements for the Community Fund	2.1.180	The Council would like further information and clarity on the governance arrangements for the proposed Community Fund particularly around <ol style="list-style-type: none"> 1. administration of the fund 2. awarding panel and membership 4. frequency of meetings 5. annual funding allocations 6. annual spending limits 	Thurrock Council agree with the emerging approach to other governance arrangements as set out in the S106 Heads of Terms for the Community Fund, subject to further development of the detail for the Final s106 Agreement.	Section 106 Agreements (7.3)	Matter Agreed, subject to review of DCO documents
Capacity building and support for applicants	2.1.181	Thurrock Council would urge LTC to make provision for over and above the Fund itself, to facilitate community capacity building. If the communities of Thurrock are to benefit in full from the Fund then they will need support in working up their ideas into Fund-ready concepts. The Council would like to review proposals for how capacity building will be delivered.	National Highways can confirm that capacity building and providing support for applicants will be written into the scope of the Essex and Kent Community Foundation(s), when they are established, in accordance with good practice. Further mechanisms (around how this capacity building will be delivered), will be developed democratically in partnership with the Community Fund Awarding Panel and local authorities, ahead of the funds becoming available. Thurrock Council have seen the Project position set out above, but are yet to provide feedback.	N/A	Matter Under Discussion
Provision of grants	2.1.182	National Highways should provide the following grants <ol style="list-style-type: none"> 1. Grants to support voluntary and community organisations 	The Project is proposing two Community Funds (one north and one south of the river). Grants of up to £10,000 would be awarded to eligible community-led initiatives across four key themes. Discussions are underway with local authorities to secure these funds via Section 106	Section 106 Agreements (7.3)	Matter Not Agreed

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		<p>who are helping local people into employment</p> <p>2. Capital grants to facilitate aesthetic and environmental improvements within the community</p>	<p>agreement HoTs. It is Thurrock Council's view that an adequately funded 'Community Fund' would be able to deliver these in principle, however the Council disagrees with the quantum of the Community Fund in the first place.</p>		
Provision of grants	2.1.183	<p>National Highways should provide the following grants</p> <p>1. Grant funding to improve business environments</p> <p>2. Green business support scheme</p>	<p>Thurrock Council's requests have been considered and the Project position is to not go ahead with these proposals as there are other statutory tools available from the government to address these types of initiatives (e.g. businesses asking for compensation).</p>	N/A	Matter Not Agreed
Additional street tree planting	2.1.184	<p>National Highways should support additional street tree planting initiatives</p>	<p>National Highways had proposed a Community Tree Planting Programme in addition to the Community Fund to support local communities with tree-planting initiatives. Initial proposals were shared with all local authorities including Thurrock Council in January 2022. However, feedback on the idea was mixed; some LAs felt that the objectives of the tree-planting initiative could be met by the 'Environment' theme within the Community Fund. Plus, similar initiatives already exist in some other LAs, notably in Essex. It was also highlighted that there are many existing sources of free trees, e.g. from the Woodland Trust, however what the LAs really need was land to plant them on, and this is not something National Highways is able to help with. Based on this feedback, it was decided to drop the Community Tree Planting Programme from further consideration.</p>	N/A	Matter Under Discussion

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			<p>Furthermore, the criteria for Community Tree Planting Programme was not aligned to the aspirations of the Council to begin with. The Council were keen on street tree planting, and the initiative was to be focussed on planting trees on land that would be accessible by the local community such as owned by schools, attached to community centres, community owned/managed public space and allotments.</p> <p>Thurrock Council have seen the Project position set out above, but are yet to provide feedback.</p>		
EIA Methodology					
Need for a new Scoping Opinion	2.1.185	<p>The Council are of the opinion that a new Scoping Opinion needs to be provided for the project. This is due to the significant changes since the original Scoping Opinion was issued, including a significant change in the size of the development boundary, which could have led to new, unassessed, environmental impacts. The significant changes include:</p> <ul style="list-style-type: none"> • Removal of Tilbury Link • A13 junction redesigned • Pylons relocated 	<p>The Scoping Opinion for the LTC Project formed the basis for the Preliminary Environmental Impact Report (PEIR), which was shared at Statutory Consultation and the Environmental Statement (ES) submitted as part of the subsequently withdrawn application for development consent.</p> <p>Over the time between the receipt of the scoping opinion and the submission of the application there have been a number of changes as noted by Thurrock Council. To help ensure that the scope of the environmental assessment has remained comprehensive and robust, an Environmental Update document [Remaining Changes since DCO 1, May 2022] was also shared and discussed at CIPHAG in May 2022. This is following the release of the full ES submitted with the previous, now withdrawn, application for development consent, which was shared with all Local Planning Authorities for their consideration and comment.</p>	ES Chapter 4 - EIA Methodology (6.1)	Matter Not Agreed

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
		<ul style="list-style-type: none"> Additional land take around East Tilbury Growth in development boundary <p>The determination of the significance of the receptors was undertaken by National Highways, in the absence of input from local authorities like Thurrock Council, which should be corrected.</p>	<p>With regard to the identification of receptors and the sensitivity of receptors, this has been done in accordance with the Design Manual for Roads and Bridges methodology set out in National Highways 'Standards and guidance' section within Chapter 4 (EIA Methodology) of the ES. A series of briefings have been undertaken prior to the DCO submission to present the results of the EIA in advance of the full ES which will be made available to the LPAs, as part of the application.</p>		
Inclusion of a Transport Chapter in the ES	2.1.186	<p>The Council's requirement is that a transport chapter is included within the ES. This will ensure that all of this information is clearly dealt with in one place, providing a more legible understanding of impacts in a transparent manner. In doing so, this will help facilitate a collaborative approach to identify and mitigate impacts locally. A transport chapter should set out:</p> <ul style="list-style-type: none"> Preparation of data to underpin assessment of operational and construction transport effects; 	<p>The project memorandum titled 'LTC - Traffic and transport assessment in DCO 2.0' was issued to Stakeholders including Thurrock Council in April 2022. The memorandum was provided in response to feedback from stakeholders and the Planning Inspectorate, related to the inclusion of a dedicated Traffic and Transport Assessment chapter within the Environmental Statement (ES) in the DCO application. The memorandum explains how the project has proposed that the traffic and transport assessment will be covered within the DCO application documents.</p> <p>In response, Thurrock Council have commented on this memo saying LTC's assessment of the previous DCO issues raised on this matter, including review of policy documents, legal requirements and gap analysis is satisfactory. The proposed approach of using the Transport Assessment and the relevant chapters of the ES was also considered appropriate and better coordinated. There was a request from Thurrock Council</p>	<p>Environmental Statement chapters (6.1) Transport Assessment (7.9)</p>	<p>Matter Agreed, subject to review of DCO documents</p>

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		<ul style="list-style-type: none"> Assessment of transport related effects, e.g. severance etc; and References to the assessments relating to air quality, noise, human health and cumulative assessment. 	<p>to make sure the detailed description (of how the data has been used in each relevant ES assessment topic chapter) clearly sets out exactly what traffic modelling data has been used, provides a justification for the use of that data, signposts where the traffic modelling data relevant to that topic chapter can be found and state the version/date of the traffic model data used. National Highways have confirmed this has been undertaken and presented in the relevant chapters of the ES.</p> <p>Thurrock Council are agreed in principle with the position set out above but would like to review the DCO documents before formally agreeing this matter.</p>		
Comments on Air Quality methodology (LA105 - Significance and Limit Values)	2.1.187	The Council disagree with the approach to methodology undertaken by LTC and the reliance on LA105. In the Council's opinion, the thresholds applied remain a limitation of the approach that only identifies significance where limit values are exceeded, which is not relevant when addressing health related impacts of non-threshold pollutants.	<p>National Highways disagree with the Council's position. The air quality assessment does not only focus on areas of exceedance. Given the size of the study area, it would not be feasible or proportionate to model every receptor within 200m of the ARN, and this would not change the assessment or its conclusions.</p> <p>The National Highways (DMRB) guidance in terms of significance makes it consistent between schemes; without the guideline bands there would be no guidance on numbers of properties that would lead to a significant effect, it is therefore more transparent to decision makers and stakeholders. The significance assessment explains the reasoning behind determining whether the impacts are significant or not, so that the professional judgement decision process is transparent to stakeholders. The DMRB affected road criteria is applicable to all roads in the study area regardless of whether they are a trunk or urban road. The final modelling and data is presented in</p>	ES Chapter 5 - Air Quality (6.1)	Matter Not Agreed

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			ES Chapter 5. The findings of the completed assessment, along with relevant mitigation was also presented at a briefing session in September.		
Omission of PM2.5 in air quality assessment	2.1.188	PM2.5 is not currently assessed and reported as part of the DMRB HA207/07 and hence will not be included within the assessment for the project. The Council believes that this should also be included as part of the assessment, as it is PM2.5 which is potentially more prejudicial to health than PM10. The evaluation of significance of this pollutant should also be assessed, particularly as it is the very fine elements of particulate matter i.e. PM2.5, such as brake & tyre wear emissions and diesel exhaust emissions that contribute to the bulk of PM2.5 emissions and it is this element which is most prejudicial to health.	The air quality assessment has considered the impact of the Project on Particulate Matter (PM), both for PM10 and PM2.5. PM10 has been explicitly modelled using road traffic PM10 emissions factors and Defra background pollution maps. In the case of PM2.5, it has been assumed that all road traffic PM10 is also equivalent to PM2.5, which is a worst-case assumption given that PM2.5 typically makes up less than 70% of PM10. The concentrations predicted have been assessed against national air quality objectives and limit values. The final modelling results are presented in the ES Chapter 5.	ES Chapter 5 - Air Quality (6.1)	Matter Not Agreed
Other Issues on Air quality	2.1.189	Thurrock Council requested a response to the following key issues:	1. UK's Air Quality Expert Group (AQEG) acknowledge that PM2.5 is considered a non-threshold pollutant and there is no evidence that there is a safe level of PM2.5, below which human health impacts can be ruled out.	ES Chapter 5 - Air Quality (6.1)	Matter Under Discussion

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methodology		<p>1. Confirm National Highways agree with the WHO and Coroner as to the adverse effects of traffic related air pollution on health (in particular PM2.5) at levels below the current AQOs?</p> <p>2. Acknowledge that there will be an overall increased air pollution burden to the residents of Thurrock as a result of LTC or advise where in the DCOv2 submission they have or will demonstrate otherwise?</p> <p>3. Confirm in relation to 'EIA significance' why these impacts do not require mitigation or monitoring during the operational phase?</p> <p>4. Clarify how National Highways are proposing to deliver on their LAQM obligations (as a relevant public authority) under the Environment Act and that the requirements of the Act are compatible with the current DMRB LA105 approach?</p> <p>5. Advise how they will improve the communication of</p>	<p>However, the focus of legislation for PM2.5 is on limiting long-term exposure through the use of annual standards. National Highways acknowledges the position set out by AQEG that particulates in terms of human health have the potential to contribute to health impacts below legal thresholds. However, National Highways, like local authorities and developers are obliged to evaluate the impacts of particulate matter (PM10 and PM2.5) with respect to the thresholds set out in UK legal frameworks for air quality.</p> <p>2. There are both improvements and deteriorations in air quality as a result of the scheme on roads within the area covered by Thurrock Council. The results of the air quality assessment are set out in ES Chapter 5. National Highways do not agree with the statement from Thurrock Council that overall there will be an increased air pollution burden for their residents. The air quality modelling shows that the majority of improvements in air quality within Thurrock coincide with the most populated areas. None of the receptors modelled within Thurrock are predicted to exceed the UK legal thresholds for either nitrogen dioxide nor particulate matter (PM10 and PM2.5).</p> <p>3. The air quality assessment has concluded there are no significant air quality effects during the operational stage, and consequently there is no requirement for mitigation or monitoring.</p> <p>4. National Highways already work with Local Authorities in England on their air quality plans where they interact with the SRN and is in keeping with the recent requirements set out in the environment act as an air</p>		

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		<p>the findings of the air quality assessment to enable members of the public to engage and be informed?</p> <p>6. Confirm that they will share pertinent technical data used to undertake the air quality assessment to allow meaningful review, which would include the traffic data for the full network (flow, speed, % HDV) and modelled outputs both in georeferenced GIS format (including DM/DS traffic flows and speed bands for AADT and modelled periods) and results (DM/DS NO2 and PM concentrations) and webTAG appraisal worksheets (in full).</p>	<p>quality partner. These duties are different to the requirements of scheme assessment such as for LTC. The approach for assessing schemes is set out DMRB LA105 which is focused on the evaluation of new road schemes.</p> <p>5. National Highways have offered to have a technical discussion with Thurrock Council to understand the concerns about the presentation of the information and to explore ideas to communicate the information to the public.</p> <p>6. National Highways will work with Thurrock Council to support them in preparing their Local Impact Reports following submission of the DCO application.</p> <p>Further discussions will be carried out with the Council once the ES Chapter 5 has been shared.</p>		
Consideration of sensitive receptors in air quality and noise assessments	2.1.190	<p>1. The assessment of impacts from construction should consider other sensitive receptors beyond dwellings and include schools, hospitals and any traveller sites (Gammon Field traveller site along Long Lane) as these are particularly vulnerable to air quality and noise impacts.</p>	<p>Receptors have been defined in accordance with the relevant Design Manual for Roads and Bridges (DMRB) guidance (such as LA 111 – Noise and vibration) and comprise of dwellings, hospitals, healthcare facilities, education facilities, community facilities, quiet areas or potential quiet areas, international and national or statutorily designated sites, public rights of way and cultural heritage assets. The travellers site has been treated as a residential receptor.</p>	<p>ES Chapter 5 - Air Quality (6.1)</p> <p>ES Chapter 12 - Noise and Vibration (6.1)</p> <p>ES Chapter 13 - Population and Human Health (6.1)</p>	Matter Under Discussion

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			<p>The assessment of the noise and air quality impacts on the relocated Travellers site has been considered in the ES Chapter 5 (Air Quality), Chapter 12 (Noise and Vibration) and Chapter 13 (Population and Human Health).</p> <p>The design of the Gammon Field travellers' site has been progressing with the Council and the occupiers. This will be appended to the Design Principles, after a formal sign off by the Council. A draft indicative layout plan will be appended to the Design Principle (S11.12) whilst National Highways formalise this. National Highways have shared the draft indicative layout plan and Design Principle (S11.12) with the Council. Thurrock Council are yet to confirm their position on the matter.</p>	Design Principles (7.5)	
Designation of a Scheduled Monument in the assessment and the primacy of NPS over DMRB	2.1.191	The Council suggest the destruction of a scheduled monument should be identified as the loss of one of the highest levels of protected monuments; equivalent to a Grade 1 designated building. This should be cascaded across the DCO documents and mitigation. A specific mitigation strategy should be agreed when dealing with the complete loss of a scheduled monument. (NPS v. DMRB – how does it deal with the primacy of the NPS over DMRB, given that specific	<p>Nationally Significant Infrastructure Projects (NSIPs) are determined in accordance with the decision-making framework in the Planning Act 2008 and relevant National Policy Statements (NPSs), as well as any other matters that are both important and relevant (which may include the National Planning Policy Framework (NPPF)). The DMRB is a framework to set out and agree methodology for design and assessment for highway schemes. It allows for a consistent approach across all road schemes. National Highways has and continues to be in consultation with government in the development of the NPSNN to ensure that DMRB and National policy are developed in the knowledge of each other.</p> <p>NPSNN and the NPPF both acknowledge that the loss wholly or in part of a scheduled monument could be classed as substantial harm. Following the assessment presented within the ES Chapter 6, and discussions with Historic England,</p>	ES Appendix 6.9 - Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (6.3)	Matter Under Discussion

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		DMRB guidance is used to guide the EIA topics)	<p>National Highways acknowledge that the loss in part of the scheduled monument cropmark complex at Orsett, is substantial harm. However the need for the Project along with its benefits constitute exceptional circumstances, which justify the substantial harm.</p> <p>REAC commitment CH003 'Cropmark complex scheduled monument at Orsett' commits the Contractors to "follow the Management of Research Projects in the Historic Environment (MoRPHE) procedural model (Historic England, 2015) to prepare a detailed project design for the archaeological investigation of the cropmark complex at Orsett (SM1). This design will inform the Written Scheme of Investigation (WSI) and the development of archaeological mitigation. After completion of the archaeological works, as specified in the WSI, the relevant archaeological contractor shall apply to Historic England for removal of the site from the official list of protected historic sites."</p> <p>National Highways has shared earlier versions of these documents. Further discussions will be carried out with the Council once the finalised documents have been shared.</p>		
Impact on historic character of the landscape	2.1.192	The impact of mitigation measures such as earthworks and planting upon the historic character of the landscape must be considered	The design of the proposed environmental mitigation has had regard to the historic character of the landscape. For example, LSP.07 of the Design Principles states that to protect views across historic landscape and topography, the new landscape design will take account of local landscape character, respect historic features and reference historic land use, landforms, field patterns and boundaries. Examples of this within Thurrock include agricultural land being reinstated either side of the main	Design Principles (7.5) ES Chapters (various) (6.1)	Matter Under Discussion

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			<p>alignment between Tilbury and Chadwell St Mary which is in keeping with the historic character of reclaimed marshland.</p> <p>These documents have been shared in draft at consultation and engagement, and have been subject to discussion with the Council. Further discussions will be carried out with the Council once the finalised ES chapters and Design Principles have been shared.</p>		
Impact on vulnerable users	2.1.193	The Council continues to be concerned that some issues are not assessed within the Environmental Statement (including the HEqIA), for example, the effects of the scheme on all vulnerable users, for either the construction period or the operational phase.	The impact of the scheme on sensitive communities is set out in the HEqIA. An earlier version of this document has been shared and discussed with the Council. Further discussions will be carried out with the Council once the finalised document has been shared.	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion
Potential impact of proposed construction on traffic	2.1.194	The potential impacts from the proposed construction traffic routes will need to be assessed within the EIA and HEqIA along with the long-term effects of road closures and how this impacts access to hospitals. The OTMPfC must set out either specific mitigations or a framework to mitigate the deleterious effects that the additional traffic would	<p>The potential traffic impacts arising from construction are assessed within the Transport Assessment, including changes in vehicle flows and journey times. Potential impacts of the proposed construction routes in relation to specific topics such as severance are assessed within the HEqIA and reported on in the ES. The ES also reports on the effects of road closures on access to community infrastructure, including to healthcare facilities such as hospitals where relevant.</p> <p>The oTMPfC provides an overview of the approach that will be followed when undertaking temporary traffic management for the safe construction of the Lower</p>	<p>Transport Assessment (7.9)</p> <p>Health and Equalities Impact Assessment (7.10)</p> <p>Outline Traffic Management Plan for Construction</p>	Matter Under Discussion

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		cause along the Council's routes to the contractor's compounds and works.	<p>Thames Crossing Project. It also discusses construction access routes and explains management measures available to our Contractor(s) to reduce the impact on the local community (including journey time reliability, access, and safety). The oTMPfC states that access and egress to healthcare facilities will be maintained throughout the construction period and that communications will update facilities regarding any closures and diversion routes.</p> <p>It should be noted that this document will be used to inform the update of a Traffic Management Plan for Construction (TMP), a requirement of the Development Consent Order (DCO), which will be produced by the Contractors post DCO grant. It should be noted that LAs would be consultees to the production of this document.</p> <p>Further discussions will be carried out with the Council once the finalised documents have been shared.</p>	(oTMPfC) (7.14)	
Air Quality					
Best practice approaches in relation to dust and emissions	2.1.195	Thurrock Council requested LTC to demonstrate compliance on how the Mayor's 'Control of Dust and Emissions During Construction and Demolition' Supplementary Planning Guidance (SPG) is incorporated as appropriate within the REAC & CoCP.	<p>The Project is committed to best practice measures for managing dust and emissions, secured via the Code of Construction Practice (CoCP) and REAC measures AQ001, AQ002, AQ003, AQ004, AQ005, AQ006, AQ007 and AQ008. The Project has also demonstrated compliance with the Mayor's Supplementary Planning Guidance document.</p> <ul style="list-style-type: none"> <i>REAC AQ001 - All Non-Road Mobile Machinery (NRMM) would comply with the engine emission standards set by London's Low Emission Zone for NRMM across all sites within the Order Limits (even when the compounds are outside London).</i> 	Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)	Matter Agreed*

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			<ul style="list-style-type: none"> REAC AQ008 - Actions taken to resolve the situation will be recorded in a site logbook and the relevant local authority notified of the event and actions by telephone or email, as soon as is reasonably practicable, after or during the dust event. REAC AQ001 - Use low emission vehicles and plant fitted with catalysts, diesel particulate filters or similar devices where reasonably practicable (previously worded as - avoid the use of diesel or petrol powered generators and use mains electricity or hydrogen or battery powered equipment where these options are available) <p>Thurrock Council have seen the Project position set out above and marked the matter agreed.</p>		
Air Quality impacts along the route	2.1.196	<p>Thurrock Council consider that there may be unacceptable air quality impacts at a number of locations arising from construction and operation. Subject to confirmation of the impacts set out in the Environment Statement, there are unacceptable impacts at:</p> <ul style="list-style-type: none"> Tilbury Fields Buckingham Road (Linford) The A1089 Dock Road 	<p>The road network which forms the study area for the air quality assessment is known as the affected road network (ARN). Representative Receptors are modelled along the ARN to determine the scheme impacts. Receptors outside the ARN are not included in the air quality assessment. The areas listed by the Local Authority are included in the traffic model and therefore the change in traffic flows on those roads determines whether there is a requirement to include in the air quality model. The methodology and results of the modelling is included in the ES Chapter 5.</p> <p>The air quality assessment is presented in ES Chapter 5 - Air Quality, together with mitigation measures where appropriate. The air quality assessment assesses the</p>	<p>ES Chapter 5 - Air Quality (6.1)</p> <p>Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)</p>	Matter Under Discussion

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		<ul style="list-style-type: none"> • Calcutta Road • Fort Road • The A13 • Tilbury • Chadwell St Mary • Grays • Stifford Clays, Chafford and North Stifford, and Belhus wards - A1013 - Brentwood Road - Orsett Cock Junction - The link between Orsett Cock Roundabout and the A1089 	<p>impact of the project on roads that trigger the traffic criteria change in DMRB LA105.</p> <p>Further discussions will be carried out with the Council once the finalised ES chapter 5 has been shared.</p>		
Actions in case of air quality monitoring exceedance	2.1.197	<p>The Council require amendments to the REAC:</p> <p>AQ006 – the local authorities must be able to comment and approved if dust monitoring is required and the monitoring locations.</p> <p>AQ007 – dust monitoring should begin at least 6 months in advance of construction to cope with seasonal variations.</p>	<p>AQ006 - The approval of the air quality monitoring programme (AQ006) will be made by the Secretary of State in consultation with relevant local authorities.</p> <p>AQ007 - Extensive baseline monitoring surveys were completed between 2018 and 2019 for Air Quality. Based on other projects, pre-construction baseline monitoring would usually be undertaken 3-6 months prior to commencement of construction, however, to address concerns raised by local authorities, a commitment was made to install additional pre-construction baseline monitors this year. This is pre-construction monitoring outside of the DCO process. As our modelling and assessment work for DCO submission has been completed, the pre-construction baseline monitoring data will not be available in time to inform our assessment.</p>	Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)	Matter Under Discussion

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			However, the pre-construction baseline monitoring data would be used to inform the main works contractors' air quality and noise monitoring programme for construction as set out in REAC commitments AQ006 and AQ007.		
Operational Air Quality and Noise Monitoring	2.1.198	<p>Thurrock Council would like LTC to install sensors to monitor operational air quality and noise, with required actions if target limits are exceeded</p> <p>1. NO2 Monitoring - The Council would also like LTC to supplementing the proposed particulate monitoring programme with monitoring of NO2 particularly in proximity to proposed heavily trafficked haul routes and construction compounds where there is currently limited monitoring undertaken by Councils and potential impacts are largely unquantified.</p> <p>2. Operational Monitoring for air quality and noise - The Council require operational air quality and noise monitoring for up to 3 years following completion of the works and for the same Exceedance</p>	<p>National Highways has proposed monitoring where relevant and linked to potential effects, and as guided by relevant policy, legislation and standards. In each case, the consideration for monitoring of environmental effects has been included by each Environmental Statement topic throughout the EIA having regard to the relevant scope, methodology and professional standards and in-line with EIA Regulations and adopted policy and legislation. National Highways is content that by applying this approach, the Project has met its requirements to undertake a full detailed assessment of likely significant effects and identified mitigation to address them where necessary.</p> <p>Where mitigation and/or monitoring is considered necessary, this has been secured either through the DCO itself (as part of the Register of Environmental Actions and Commitments (REAC) or Code of Construction Practice (CoCP).</p> <p>1. The REAC sets out a requirement for air quality monitoring (particulates) during construction. Following a request from Thurrock Council, National Highways have agreed to install this air quality monitoring prior to construction (in 2022), although this is not necessary to meet the environmental mitigation requirements set out through the environmental assessment. National Highways are currently considering adding NO2</p>	<p>ES Chapter 5 - Air Quality (6.1)</p> <p>ES Chapter 12 - Noise and Vibration (6.1)</p> <p>Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)</p>	Matter Under Discussion

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		Framework to be applicable during this period.	<p>monitoring to this monitoring programme, noting that adverse impacts associated with NO2 are not considered to require monitoring during construction.</p> <p>2. The air quality and noise assessment has concluded there are no significant air quality effects during the operational stage, and consequently there is no requirement for mitigation or monitoring.</p>		
Terrestrial Biodiversity					
Commitment to Biodiversity Net Gain	2.1.199	<p>The Council state that Biodiversity Net Gain should be considered from the outset of the design process and it is currently unclear as to how National Highways will ensure that biodiversity net gain (BNG) policy requirements are met.</p> <p>The Council note that no commitment has been made within the proposed mitigation for the provision of Biodiversity Net Gain. The scheme should ensure ecological, landscaping, and flood compensation areas contain high quality habitats which are appropriate, and Thurrock Council and other stakeholder should be consulted on the</p>	<p>The biodiversity metric is detailed in Appendix 8.21 of the Environmental Statement. Details of the habitats proposed areas of landscaping, ecological mitigation and compensation, and flood compensation are shown on the Environmental Master Plan and in the planting specifications. The objectives of these habitats, including management and monitoring proposals is detailed in the OLEMP and in the Design Principles. The project design has been developed with a view to increasing the biodiversity value wherever possible across the project and has sought to deliver a landscape scale approach to habitat mitigation through improved connectivity and links with areas of retained habitats as well as new areas of habitat creation associated with other projects. This aligns with the advice provided by Natural England.</p> <p>The Project also ensures that it meets Biodiversity Net Gain in line with emerging policy.</p> <p>Thurrock Council have seen the Project position set out above and marked the matter agreed.</p>	<p>Appendix 8.21 - Biodiversity Metric Calculations (6.3)</p> <p>Outline Landscape and Ecology Management Plan (6.7)</p> <p>Design Principles (7.5)</p> <p>ES Figure 2.4 - Environmental Masterplan (6.2)</p>	Matter Agreed

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		appropriateness of these areas.			
Specific queries regarding design changes included in the Design Refinement Consultation	2.1.200	<p>Change 35 - Additional land for overhead electricity distribution cable diversion works</p> <p>1. Details on the extent of the habitat loss needs to be provided.</p> <p>2. No details of mitigation or compensation have been provided.</p> <p>Change 38 - Reduced woodland planting within The Wilderness</p> <p>1. Evidence of biodiversity mitigation to increase the area's biodiversity value needs to be provided</p>	<p>Change 35</p> <p>1. Details on the extent of the habitat loss have been provided in the Design Refinement Consultation material and ES Chapter 8 : Terrestrial Biodiversity. Any relevant mitigation or compensation proposals are also presented in ES Chapter 8.</p> <p>Change 38</p> <p>1. Further details around increasing the area's biodiversity value is included in the outline Landscape and Ecology Management Plan (oLEMP).</p> <p>Further discussions will be carried out with the Council once the finalised documents have been shared.</p>	<p>ES Chapter 8 : Terrestrial Biodiversity (6.1)</p> <p>Outline Landscape and Ecology Management Plan (6.7)</p>	Matter Under Discussion
Material Assets and Waste					
Construction waste eliminated through project design changes	2.1.201	National Highways state the reuse of excavated material from the tunnels for reuse within the Order Limits as 10,400,000 cubic metres. Is this to be a commitment to which the appointed contractors will have to adhere? It should be stated within the control documents	At Community Impact Consultation the Outline Materials Handling Plan (oMHP) and Outline Site Waste Management Plan (oSWMP) stated that the Project (not just tunnels) would retain 10.4M m3 of site won material within the Order Limits for re-use and 1.33M m3 to be taken offsite for management. This was aligned to the design DR3.0 and earthwork approach at the time. In the development of the Project design (DR3.3) and an updated earthwork approach, the Project has further improved the amount of material retained on site and	Code of Construction Practice (CoCP) Annex B outline Materials Handling Plan (6.3)	Matter Under Discussion

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		as a commitment and not just an aspiration. The metrics on that should then be reported to the stakeholders and the Secretary of State.	<p>thus reducing the quantity transported offsite to approximately 0.5M m3.</p> <p>The earthwork quantities and associated management at this stage has informed the environmental impact assessments including traffic impacts. The metrics to which the contractor will need to adhere to is the impact of the management of earthwork materials not the quantity itself. The earthwork quantities is a developing aspect aligned to design development and will be further refined in conjunction with the detailed design development. The principles of how material will be handled is detailed in the oMHP and further commitments to handing and re-use targets is detailed in the REAC.</p> <p>Further discussions will be carried out with the Council once the finalised documents have been shared.</p>	<p>Code of Construction Practice (CoCP) Annex A Outline Site Waste Management Plan (6.3)</p> <p>Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)</p>	
Lack of adequate mitigation	2.1.202	<p>Thurrock Council consider there to be a lack of adequate mitigation measures in regard to some commitments listed in the Register of Environmental Actions and Commitments (REAC). Specific commitments which have been highlighted are REAC ref no.</p> <p>1. MW005 (Pre-demolition surveys) - No clear outline of mitigation measures that will be implemented in the event</p>	<p>1.MW005 relates specifically to undertake pre-demolition surveys to identify the potential presence of hazardous material. This is only one of a number of measures relating to the safe management of hazardous material including a commitment to develop Construction Site Waste Management Plans (CSWMP) (MW010). Other commitments include such as segregation of hazardous materials and disposal under duty of care (MW010).</p> <p>2. AQ001 includes a specific commitment for all on-road heavy vehicles to comply with the standards set within the London Low Emission Zone across all sites within the Order Limits for the relevant class of vehicle.</p>	<p>Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)</p>	Matter Agreed, subject to review of DCO documents

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		<p>that materials are identified as being hazardous. Clear mitigation measures are required in relation to how hazardous substances will be disposed of in a safe manner that protects workers health. If this is linked to mitigation outlined elsewhere in the REAC, then clear signposting is required.</p> <p>2. AQ001 (Vehicle and plant emissions) - Use of electric/hybrid vehicles where practicable has not been included in the mitigation measures. It would be useful to have clarification on the rationale for not including this.</p>	Thurrock Council are agreed in principle with the position set out above, but would like to review the DCO documents before formally agreeing this matter		
Ensure clear waste management processes and mitigation measures during	2.1.203	The discussion on M11 was initially focussed on waste management measures during construction. However, on further discussion, Thurrock Council confirmed their concerns were for both construction and operational phases of the project, summarised below. The concerns on the operational	<p>The Project is committed to clear and robust waste management and mitigation processes during its construction phase as summarised below.</p> <p>1) Covered by oSWMP (project commitments and targets) and REAC MW006 and MW007.</p> <p>2) Covered by the Outline Materials Handling Plan (oMHP) which states '<i>Priority would be given to sourcing primary, secondary and recycled aggregates from Kent, Essex and Greater London whenever the design specification permits and supply is available, to embody the proximity principle of sourcing materials as close to</i></p>	Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3) Code of Construction	Matter Agreed*

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construction		<p>phase are listed under Item No. 2.1.204</p> <p>Construction phase</p> <ol style="list-style-type: none"> 1) Management of wastes in accordance with waste hierarchy 2) Management of wastes in accordance with the proximity principle 3) Management of wastes in line with extant Environmental Permits or Exemptions. 4) Storage and management of wastes clearly identified appropriate storage areas or containers 5) Records to comply with Duty of Care and Environmental Permit/Exemption compliance requirements 6) Quantification of projected waste arisings and allocation (both spatially and temporally) within the development boundaries 7) Identification of targets/rates for minimum recycling /reuse/landfill for the project and/or specific waste streams 	<p><i>the Project as possible</i>. The Contractor will use the BRE Framework Standard for Responsible Sourcing (BES 6001) (BRE, 2008), to verify imported materials are sustainably sourced and managed, to reduce impacts throughout the supply chain.</p> <ol style="list-style-type: none"> 3) Covered by REAC MW007 (Reuse of excavated materials and soils) 4) Covered by REAC MW010 (Construction Site Waste Management). 5) Covered by oSWMP (Monitoring) and REAC MW010 (Construction Site waste management procedures). 6) The project waste arisings will be spilt out into the three contract areas. This has not been completed yet as we are waiting for updated materials and waste quantity information. Material stockpile and storage information will be provided in the oMHP. REAC MW010 provides commitments about stockpiles and storage of waste. 7) Covered by oSWMP and REAC MW001, MW007, MW011 and MW0013. 8) Covered by oSWMP and CoCP in the section on <i>'Induction, training and briefing procedures for staff'</i> 9) Covered by REAC MW010 (Construction Site waste management). 10) Covered by oSWMP, which is a framework document. A Construction Site Waste Management Plan would be submitted under Requirement 4 of the DCO, in line with the controls and commitments in the oSWMP. REAC MW011 was updated as listed below to demonstrate the levels of reuse that are achievable for the Project. The Contractor would achieve a target that 	<p>Practice (CoCP) Annex B outline Materials Handling Plan (6.3)</p> <p>Code of Construction Practice (CoCP) Annex A Outline Site Waste Management Plan (6.3)</p>	

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		<p>8) Regular training for or staff and/or sub-contractors</p> <p>9) Appropriate containment of wastes during transportation</p> <p>10) Detailed measures to deliver these requirements should be set out within either a detailed SWMP</p>	<p>95% (by weight) of inert construction, demolition and excavation wastes destined for off-site waste management outside the Order Limits would be diverted from final disposal in landfill.</p> <p>Thurrock Council have seen the commitments set out above and marked the matter agreed.</p>		
Ensure clear waste management processes and mitigation measures during operation	2.1.204	<p>Thurrock Council have the following concerns for the operational phases of the project</p> <p>1) Provision of clearly marked and/or colour coded bins</p> <p>2) Management of planned/unplanned maintenance in accordance with the best practice procedures.</p> <p>3) Source segregation of hazardous waste</p> <p>4) Regular training for staff and/or sub-contractors]</p> <p>5) Exploration of further opportunities for re-use of materials during detailed design</p>	<p>The Project is committed to clear and robust waste management and mitigation processes during its operational phase as summarised below.</p> <p>1) Covered by REAC MW016 (points 6, 8, 9)</p> <p>2) Covered by REAC MW016 (point 3)</p> <p>3) Covered by REAC MW016 (point 6)</p> <p>4) Covered by CoCP in the section on '<i>Induction, training and briefing procedures for staff</i>'</p> <p>5) Covered by REAC MW006 and MW016 (point 17)</p> <p>Thurrock Council have seen the commitments set out above and marked the matter agreed.</p>	Code of Construction Practice including the Register for Environmental Actions and Commitments (6.3)	Matter Agreed*
Comments on draft		The Council's concerns relate to the sufficiency of the level of	National Highways have provided the following in response to the concerns raised by Thurrock Council:	Code of Construction	Matter Under Discussion

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DCO Documents (draft oSWMP)	2.1.205	<p>detail provided for the scale, duration and waste generation potential of the proposed project.</p> <p>1. There is no clarity on if the contractor would comply with the 'anticipated management targets' or are they for guidance. Confirmation is needed that there is sufficient capacity at off-site recycling sites and landfill sites to take the predicted arisings</p> <p>2. The waste arisings are not described with regards to their phasing</p> <p>3. There is no evidence that the storage capacities within the compounds have been assessed for sufficiency.</p> <p>4. The movements of large tonnages to/from excavation to stockpile/sorting/treatment locations before reuse (over an extended area) should be considered within assessments and control documents. Are these wastes likely to cross the river? Multi modal approach</p>	<p>The level of detail sought will be provided in the next iteration of documents provided to secure secondary consents including the SWMP and MHP, developed post consent in consultation with the LAs.</p> <p>The updated assessment of likely significant effects on landfill capacity is detailed in Chapter 11: Material Assets and Waste and will assume the worst-case scenario achieving a minimum recovery of 70% (by weight).</p> <p>The DCO contains a requirement to the effect that the Environmental Management Plan must include measures or plans for the management of materials for approval by SoS following consultation with relevant planning authorities.</p> <p>The oSWMP sets out the framework for how wastes will be managed and provides a forecast of wastes anticipated to be generated. The post consent SWMP, if consent is granted will set the detailed approach for waste management and would be substantially in accordance with this oSWMP.</p> <p>The Materials Handling Plan (MHP) will be produced during the construction phase of the Project which would be substantially in accordance with this oMHP. The MHP would set out a detailed approach for waste and material movement and handling, taking into account a higher level of detail that will be available at that stage, including design, construction programme, traffic management, environmental management and site waste management requirements and commitments.</p> <p>The oMHP provides details on the compounds that have been identified for the Project. The construction</p>	<p>Practice including the Register for Environmental Actions and Commitments (6.3)</p> <p>Code of Construction Practice (CoCP) Annex A Outline Site Waste Management Plan (6.3)</p> <p>Code of Construction Practice (CoCP) Annex B outline Materials Handling Plan (6.3)</p> <p>ES Chapter 11 – Material Assets and Waste (6.1)</p>	

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		<p>needs to be considered by various assessments.</p> <p>5. There is no identified structure for monitoring, recording and reporting on the wastes generated by the scheme.</p> <p>6. There are no proposed actions to ensure that the materials identified are captured for reuse, recycling or recovery, and in particular, how will material be separately collected?</p>	<p>compounds have been identified and designed based on various requirements including to support the type, scale and complexity of works such as the tunnel portal sites.</p> <p>The oMHP provides the Project stance on multi-modal transport use which is strongly encouraged for Contractors to reduce the impact on the road network. A commitment to the use of the river is now included in the oMHP which supports the Project stance on encouraging a multi-modal approach to the transport of materials.</p> <p>The ES Chapter 11: Materials Assets and Waste provides an assessment of likely significant effects of Project wastes on waste management facilities within the study area and in line with the requirements of DMRB LA 110. The assessment presents the baseline capacity of landfill and other waste management facilities within the study area.</p> <p>The EIA has presented a material and waste transportation scenario, which through the modelling carried out in the traffic assessments. The Project requires the Contractor to consider and implement a multimodal approach to material transport in order to minimise negative impacts and reduce safety risks. The post consent detailed MHP, should consent be granted, will be submitted to the SoS for approval would include an explanation of how multimodal solutions have been included and implemented or discounted.</p> <p>The oSWMP (and subsequently the SWMP) sets out the overarching principles and procedures that would be applied for the management of waste during the construction phase of the Project. REAC MW007 commits the contractor to prioritising the reuse of</p>		

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			<p>materials within the design and sets out the process to achieve this in line with the Waste Framework Directive Article 2. REAC MW010 sets out the requirements to reduce the quantities of waste requiring offsite management, enhance recovery and recycling rates and minimise the generation of hazardous waste.</p> <p>The oSWMP sets out the overarching principles and procedures that would be applied for the management of waste during the construction phase of the Project. REAC MW010 sets out the measures which the contractor would implement to reduce the quantities of waste requiring disposal. The SWMP would be developed in line with the principles and controls of the oSWMP, in consultation with the LAs.</p>		
Noise And Vibration					
Noise impacts along the route Noise mitigation along the route and design of acoustic barriers	2.1.206	<p>The Council consider that there may be unacceptable noise impacts at a number of locations arising from construction and operation. Subject to confirmation of the impacts set out in the Environment Statement, additional mitigation is required for:</p> <ul style="list-style-type: none"> • Stifford Clays • Chafford • North Stifford 	<p>Noise Impacts An updated noise assessment is presented in ES Chapter 12 - Noise and Vibration, together with mitigation measures where appropriate.</p> <p>Noise Mitigation 1. National Highways is also committed to the preparation of a Noise and Vibration Management Plan (NVMP) for each part of the construction works subject to Section 61 control for consideration by the relevant planning authorities (NV002). NV004 states that where appropriate, consents would be obtained from the relevant local authorities under Section 61 of the Control of Pollution Act 1974 (which may include noise and</p>	<p>ES Appendix 2.2 - Code of Construction Practice including the Register of Environmental Actions and Commitments (6.3) ES Chapter 12 - Noise and Vibration (6.1)</p>	Matter Under Discussion

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		<ul style="list-style-type: none"> • Belhus Wards • Edge of East Tilbury • Linford • North of Chadwell St. Mary • In and around the A13 junction and • To the North of South Ockendon and Ockendon • Tilbury • Little Thurrock Blackshots • Little Thurrock Rectory • Orsett Cock • Link between Orsett Cock roundabout and the A1089 • Some areas within Grays <p>The Council would like the following mitigation</p> <ol style="list-style-type: none"> 1. Additional noise mitigation in Chadwell and East Tilbury during construction 2. Build sufficient earth bunds and noise barriers along the route to reduce noise impact 	<p>vibration limits where relevant) for the proposed construction works. This would include construction works at Chadwell and East Tilbury. Furthermore, day and night-time noise and vibration monitoring would be undertaken at locations identified in consultation with the relevant local planning authorities to ensure that the mitigation measures suggested are working effectively (NV008)</p> <p>2. The ES Chapter 12 and the REAC commitments set out proposed noise mitigation measures including acoustic barriers, along with route, prior to road opening at the locations identified on ES Figure 12.7, Operational Road Traffic Noise Mitigation (NV011). The embedded mitigation measure such as earth bunds are presented in the Environmental Masterplan.</p> <p>Design of acoustic barriers</p> <p>Acoustic barriers are covered under Design Principle STR.09, which commits the Project to design materiality and appearance with consideration of the surrounding context of the landscape. The height, length and barrier type will be set out in ES Chapter 12 Noise and Vibration as part of the DCO submission, and have been considered within the context of the existing landscape.</p> <p>National Highways have shared earlier versions of these assessments. Further discussions will be carried out with the Council once the finalised documents have been shared.</p>	Design Principles (7.5)	

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		The acoustic barriers (where provided) need to be set out and secured, to ensure they are as naturalistic as possible and blended in with the landscape. Further details are required on the nature, composition and scale.			
Actions in case of noise monitoring exceedance	2.1.207	<p>The Council welcome the text in the NV015 (exceedance framework for noise); however seek immediate stoppage of works in case of an exceedance (after the works undertaken as part of the scheme are confirmed to be the source of the noise)</p> <p>Original text for NV015 - In the event that noise and vibration monitoring (as provided for in NV009) identifies that noise and vibration limits (as provided for in NV004) have been exceeded the Contractor shall, at the earliest practicable opportunity, investigate to confirm that works being undertaken as part of the scheme are the source of the</p>	<p>In relation to REAC reference no. NV015, the proposed alternative wording sought by Thurrock Council is not accepted.</p> <p>It would not be practicable to completely stop works every time there is an exceedance. There might some elements of work which are unsafe to stop at short notice or would take much longer to complete if stopped causing more inconvenience to local communities (e.g. works being completed by undertaking a closure). Instead National Highways approach is to work collaboratively with the Council to quickly identify more effective but still practicable mitigation. The details on this matter will be contained in the application for prior consent under Section 61 of the Control of Pollution Act 1974, when it is submitted to the Council.</p>	ES Appendix 2.2 - Code of Construction Practice including the Register of Environmental Actions and Commitments (6.3)	Matter Not Agreed

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		<p>noise. If this is confirmed, then the Contactor shall immediately undertake a further review of the best practicable means (as defined under the Control of Pollution Act, 1974) employed for the activity to minimise noise and agree additional or modified mitigation with the relevant local authority unless otherwise agreed with the Secretary of State.'</p> <p>Alternative text sought by the Council for the (last sentence): If this is confirmed, then the contractor shall immediately stop those works causing the exceedance and undertake a further review of the best practicable means employed for the activity to minimise noise and agree additional or modified mitigation with the relevant local authority. These particular works will only recommence when satisfactory and agreed (with the local authority) mitigation is provided.</p>			

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Population And Human Health					
Independent review of HEQIA	2.1.208	<p>The Council are currently not satisfied that National Highways have addressed concerns with the methodology of the HEqIA and have not seen updates to the assessment that reflect the concerns.</p> <p>There was an Independent Review in June 2021 of the Health and Equalities Impact Assessment (HEqIA) (from DCOv1) on behalf of nine Local Authorities named in the report. National Highways responded, advising that the next iteration of the HEqIA will not be available to view until after the submission of the DCO application. This is inadequate, particularly given the potential changes to impacts as a result of the Local Refinement Consultation, the fundamental significance of those recommendations and given that National Highways state that the aim of the consultation is to improve the</p>	<p>The comments regarding the independent review of the HEqIA are noted. The project has responded to these comments by ensuring that matters raised in the review are processed and discussed with the respective local authority and in the CIPHAG forum.</p> <p>In December 2021 the project shared the approach to sharing further environmental information with external stakeholders, which has included at the monthly CIPHAG meetings.</p> <p>The project has held monthly meetings with external stakeholders including Thurrock Council to go through the HEqIA. The project provided a line by line response on how it would respond to the content of the independent review at the CIPHAG on 22nd July 2021. In addition a presentation was given to the Thurrock Task Force in July 2021. To continue this engagement, briefings on these topics were organised in September 2022.</p> <p>The final HEqIA will be made available on submission of the DCO application.</p>	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion

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		<p>project for local people. Without sight of an updated assessment, the conclusions of the Independent Review above still stand, and we cannot comment on the health outcomes highlighted in the HEqIA in relation to the proposed Local Refinement Consultation.</p> <p>Specific concerns on the methodology are 2.1.203 to 2.222.</p>			
HIA recommendation from independent review - Health Priorities	2.1.209	<p>Links between local health priorities and the assessment should be made clear. Where the local priorities identify topics or sensitive groups, these should be considered in the assessment (including in consideration of enhancement measures).</p>	<p>The links between local health priorities and the assessment have been made clear in the Health and Equalities Impact Assessment (HEqIA). Where the local priorities identify topics or sensitive groups, these have been considered in the assessment (including in consideration of enhancement measures).</p> <p>National Highways note that this and the following comments are provided in response to earlier assessments that have been shared with the Council. Further discussions will be carried out with the Council once the finalised document has been shared.</p>	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion
HIA Recommendations from Independent review -	2.1.210	<p>Further information should be provided on construction phasing as part of HEqIA (when available) and indication of how this may influence assessment and an</p>	<p>Further information on construction phasing has been included in the HEqIA. The HEqIA includes a table showing how consultation responses have influenced decision making.</p>	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion

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Construction Phasing		explanation of how HEqIA has been planned and timed to inform decision making.	Further discussions will be carried out with the Council once the finalised document has been shared.		
HIA Recommendations from Independent review - Scope	2.1.211	Further commentary and evidence should be provided to understand how the scope of the HIA was identified and agreed. This could include provision of further information on the outcomes of discussions on scoping that were undertaken with the Community Impacts and Public Health (CIPH) advisory group.	Further commentary and evidence have been provided to describe how the scope of the Health Impact Assessment has been developed. This includes the outcomes of discussions on scoping that were undertaken with the Community Impacts and Public Health Advisory Group (CIPHAG). Further discussions will be carried out with the Council once the finalised document has been shared.	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion
HIA Recommendations from Independent review - Stakeholder Engagement	2.1.212	Further information should be provided on the outcomes of stakeholder engagement exercises and how this has meaningfully informed the HEqIA and the LTC project. 1. This includes providing further details of what was agreed at the CIPH advisory group and methods of engagement and issues raised at the focus groups and how these comments were addressed. 2. Information should also be included on measures used to	Following the Independent Review of the previous version of the HEqIA, and subsequent discussions with stakeholders at the CIPHAG meetings, it was agreed that the revised HEqIA would incorporate sections evidencing how engagement with stakeholders has informed the Project. This is informed by the 'You Said, We Did' documents shared with stakeholders as part of previous consultations and a summary will be presented in the revised HEqIA on a topic-by-topic basis. Further discussions will be carried out with the Council once the finalised document has been shared.	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion

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		reach hard to reach groups. Wider concerns have also been raised regarding the consultation activities which should be addressed as part of the wider consultation strategy.			
HIA Recommendations from Independent review - Ward sensitivity	2.1.213	National Highways should clarify how ward sensitivity has been determined through clear links to the baseline.	<p>This was discussed at CIPHAG meeting held on 29th September 2021. At this meeting, the process for attributing sensitivity on a ward by ward basis was presented to stakeholders using a series of metrics (people aged 60+, children, income deprivation, health metrics (long term illness, disability, expectancy, hospital emissions (COPD etc), deaths from respiratory diseases) to attribute low, medium or high sensitivity to individual wards.</p> <p>LTC acknowledged that there are some data limitations as 2011 census data is used for a couple of metrics, however most is much more recent (e.g. Public Health England data). This information was subsequently shared with CIPHAG members who were asked to provide feedback as appropriate.</p> <p>Comments were received from Thurrock Council regarding additional metrics which could be considered. These comments have been reviewed and any amendments made to the ward sensitivity assessments have been set out in Appendix 13.2 to Chapter 13 of the ES Population and Human Health.</p> <p>Thurrock Council are agreed in principle with the position set out above but would like to review the DCO documents before formally agreeing this matter.</p>	ES Chapter 13 - Population and Human Health (6.1)	Matter Agreed, subject to review of DCO documents

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HIA Recommendations from Independent review - Methodology for aggregating impacts	2.1.214	Justification / methodology for aggregating impacts at general population / ward level should be provided. Use of GIS mapping for baseline and assessment information would enable a clearer understanding of specific impacts including effects on health inequalities.	In each case, the scale of data that can be presented is informed by the approach to baseline data availability, monitoring data, modelling, and assessment of significant effects in-line with each relevant chapter of the Environmental Statement. The location, scale and sensitivity of sensitive receptors and concentration of effects in spatial and temporal terms has been considered, along with the health metrics. Where appropriate, mapping has been used to present baseline and assessment information. Where impacts have been aggregated at Ward level, justification has been provided. More detailed geographic assessments have been included where appropriate. Effects on health inequalities have been strengthened throughout the HEqIA. Further discussions will be carried out with the Council once the finalised document has been shared.	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion
HIA Recommendations from Independent review - Duration of effects	2.1.215	Further information should be included about the duration of effects anticipated beyond if they are temporary or permanent. This is particularly relevant to the health outcomes identified during the construction phase as this phase is anticipated to last six years. Further information should be included on if effects are considered to be short term, medium term or long	Further information has been included in the HEqIA about the duration of effects anticipated beyond if they are temporary or permanent. These durations are taken from the individual EIA assessments and considered in the context of each other, the sensitivity of receptors, and their relation to health effects. Further discussions will be carried out with the Council once the finalised document has been shared.	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion

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		term and a definition provided which outlines what each of these terms mean (e.g. short term = 1-2 years).			
HIA Recommendations from Independent review - Severity and Likelihood of health outcomes	2.1.216	The assessment should provide information on the severity and likelihood of the health outcomes. At present it is just stated whether a health outcome is considered to be positive, negative or neutral, however the assessment would benefit from further information being provided on the severity of the effect (e.g. minor, moderate or major positive/ negative) to help provide a more balanced assessment and increase understanding of the level of health outcomes anticipated.	The assessment of health impacts is in line with that set out in the Design Manual for Roads and Bridges (DMRB) LA112 Population and Human Health, which outlines that health impacts should be described as positive, negative, neutral or uncertain, with supporting evidence provided to support as necessary. This is the approach undertaken for DCO submission.	Health and Equalities Impact Assessment (7.10)	Matter Not Agreed
HIA Recommendations from Independent review - Data Sources	2.1.217	There are some concerns identified with the technical data sources used to inform the HEqIA (e.g. transport, air quality and noise assessments). Technical concerns should be addressed and updated accordingly in the HEqIA as these may have	The HEqIA uses the findings of each of the topic-specific assessments within the EIA and relies on the technical data sources developed for those assessments. Further discussions will be carried out with the Council once the finalised document has been shared.	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion

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		implications for the health outcomes identified. Clarification should also be provided on how the level of effect identified in the source assessment has been translated into the effect identified in the HEqIA (including how this has been aggregated to general population / ward level)			
HIA Recommendations from Independent review - Effectiveness of mitigation	2.1.218	The HEqIA should provide further information regarding effectiveness of mitigation / enhancement measures. This could include providing a conclusion on the residual health outcome anticipated after mitigation measures is implemented.	The assessment of health impacts is in line with that set out in the DMRB LA112 Population and Human Health, which outlines that health impacts should be described as positive, negative, neutral or uncertain, with supporting evidence provided to support as necessary. More information has been included within the assessments, around the effectiveness of mitigation where appropriate. Further discussions will be carried out with the Council once the finalised document has been shared.	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion
HIA Recommendations from Independent review - Monitoring	2.1.219	Further information to be included on monitoring (impacts, mitigation, and enhancement – to be clearly specified), how this will be secured and anticipated timelines.	Monitoring has been discussed within the CIPHAG meetings. Where monitoring has been agreed for individual topics, this has been highlighted in the HEqIA. The monitoring of health specifically or as an aggregated indicator is not proposed. Whilst monitoring health indicators across an affected population would be possible, it would be very difficult to attribute changes in health specifically to the Project. People's health and wellbeing is made up of a multitude	Health and Equalities Impact Assessment (7.10)	Matter Not Agreed

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			of inter-related factors, and many of these are external to the construction of LTC.		
HIA Recommendations from Independent review - Cumulative Effects	2.1.220	An assessment of cumulative effects (in relation to inter project effects) should be included in the HEqIA instead of cross referencing the ES to see that cumulative effects on vulnerable groups are appropriately considered.	The HEqIA includes a cumulative effects section. Further discussions will be carried out with the Council once the finalised document has been shared.	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion
HIA Recommendations from Independent review - Limitations	2.1.221	The HEqIA should include a limitations section to clearly outline any limitation or constraints of the assessment.	The HEqIA includes a limitations section to clearly outline any limitation or constraints of the assessment. Thurrock Council are agreed in principle with the position set out above, but would like to review the DCO documents before formally agreeing this matter	Health and Equalities Impact Assessment (7.10)	Matter Agreed, subject to review of DCO documents
EqlA Recommendations from Independent Review - Lack of Specificity	2.1.222	The overall document lacks specificity, with individual incidences being highlighted in the tabulated analysis of the EqlA. It is important to be specific about the rationale behind decisions when evidencing that they meet the requirements of the Equality Act 2010 and the Public Sector Equality Duty. Lack of specificity in the EqlA leads to an assumption that some	Appendix B of the HEqIA has been expanded to respond to the concerns raised and to be specific about the rationale behind decisions when evidencing that they meet the requirements of the Equality Act 2010 and the Public Sector Equality Duty. Thurrock Council are agreed in principle with the position set out above, but would like to review the DCO documents before formally agreeing this matter.	Health and Equalities Impact Assessment (7.10)	Matter Agreed, subject to review of DCO documents

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		things have been missed, when it is possible this work has been done.			
EqlA Recommendations from Independent Review - Context	2.1.223	The document lacks important context, such as study area demographic breakdowns. Providing this would give a clearer picture as to whether resources/consultation efforts have been correctly apportioned. Where shortfalls are identified, analysis of possible reasons for this and reasonable mitigations should be included.	Study area demographic breakdowns for all protected characteristics are included in Appendix C of the HEqlA and this information was shared prior to and discussed with the CIPHAG at the meeting in Jan 2022. Thurrock Council are agreed in principle with the position set out above, but would like to review the DCO documents before formally agreeing this matter	Health and Equalities Impact Assessment - Appendix C - Baseline (7.10)	Matter Agreed, subject to review of DCO documents
EqlA Recommendations from Independent Review - Disparity in genders	2.1.224	There is a large disparity between numbers of male and female consultees. This is of particular concern as gender plays an important role in travel patterns, and women may have less time to take part in consultation activities than men.	This is noted as an issue, and the literature reviews have identified the importance that gender plays in travel patterns. The Applicant considers it to be of vital importance that everyone who wishes to participate in the various consultations has had the opportunity to consider and respond to the proposals. When preparing for non-statutory consultation, the Applicant developed a strategy for engaging effectively with the stakeholders and communities it had identified as its target audience. In developing this strategy, the Applicant researched and considered the presence of hard-to-reach communities, which typically include older people, those with disabilities, those who may not be able to read, and those for whom English is not their first language.	Health and Equalities Impact Assessment (7.10)	Matter Not Agreed

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EqlA Recommendations from Independent Review - Specific Characteristic Groups	2.1.225	Additionally, the scheme has been recorded as having a 'neutral' impact on Sex and Religion or Belief characteristic groups. It is recommended this is reviewed and consultation with representatives of these groups evidenced and reconsidered.	The Equalities Impact Assessment (EQIA) has been updated and this comment has been reviewed in line with the updates prepared. Various community groups, including those representing community facilities such as places of worship have been engaged with as part of the wider programme of community engagement for the Project. Relevant findings have been reported on as appropriate in the EQIA.	Health and Equalities Impact Assessment (7.10)	Matter Not Agreed
EqlA Recommendations from Independent Review - Consideration of Covid 19	2.1.226	Covid-19 should be considered more comprehensively in the EqlA as it effects groups differently and is impacting upon and shaping travel habits and consultation efforts.	Undertaking consultation and engagement to develop a DCO application during the Covid-19 pandemic (and the legislation and advice that limited usual consultation and engagement measures) has had implications, particularly for those with protected characteristics that may have found it differentially or disproportionately more difficult to contribute and engage. This clearly has implications for the approach to HEqlA, and as such the Project has adapted its approach with this in mind to remove barriers to engagement and consultation. A hard-to-reach strategy was prepared in advance of the Community Impacts Consultation, and the LTC stakeholder team has worked to reach such groups. A summary of how such groups have been engaged has been included in the HEqlA report. National Highways has complied with its duty to have regard to views expressed by consultees in developing the Project, as is demonstrated in the Consultation Report, which is part of the DCO application.	Health and Equalities Impact Assessment (7.10) Consultation Report (5.1)	Matter Not Agreed

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EqlA Recommendations from Independent Review - Intersectional Characteristics	2.1.227	Intersectional characteristics (i.e., Religion and Gender, Age and Disability) appear not to have been considered. This can be of specific use in identifying hard-to-reach groups who may have more complex considerations, and in providing important context.	The cumulative assessment within the HEqIA has been revisited and strengthened as part of DCO submission, including intra-project effects. Appendix B of the HEqIA refers to intersectional characteristics where this is considered to be relevant. Thurrock Council are agreed in principle with the position set out above but would like to review the DCO documents before formally agreeing this matter.	Health and Equalities Impact Assessment - Appendix B - Highways England EqlA Screening Template (7.10)	Matter Agreed, subject to review of DCO documents
EqlA Recommendations from Independent Review - Data	2.1.228	The HEqIA shared by National Highways in December 2020 set out a baseline. The baseline occasionally missed an opportunity to use more recent or relevant data than the 2011 Census. It is recommended that alternatives are researched where indicated. If better data does not exist, then it is recommended this is stated in the report so that reviewers are aware.	National Highway's has reviewed Appendix C (Baseline) of the HEqIA in light of these comments and it was shared with the CIPHAG in March 2022. Thurrock Council are agreed in principle with the position set out above but would like to review the DCO documents before formally agreeing this matter.	Health and Equalities Impact Assessment - Appendix C - Baseline (7.10)	Matter Agreed, subject to review of DCO documents
Consideration of travellers site	2.1.229	The Council is of the opinion that the traveller community should be identified as a vulnerable group in the HEQIA and all impacts (from	The Traveller community are identified as a vulnerable population in the HEqIA. Further assessment work has been undertaken in relation to impacts on the Gammonfield Travellers Site as a result of the new road layout. The HEqIA incorporates updated information	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion

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		<p>construction and operational) on them re air quality, noise, health accessibility be fully assessed to ensure the health of the community will not be adversely impacted.</p> <p>The Council seek assurances that the health of the community will not be adversely impacted and will not suffer worse health outcomes as a result of this relocation. For example, it must be ensured that, once the road is operational, noise levels and air quality are within permitted limits. There is also potential for OHL noise. Site specific baseline should be provided to the Council and included in the submission.</p>	<p>relating to impacts on the Travellers Site as a result of the new road layout. This includes further consideration of environmental impacts on the site and mitigation measures where appropriate. Engagement with the Traveller Community at Gammonfields Way has been taking place as part of discussions on the revised site layout.</p> <p>The noise and air quality impacts on the replacement site for the Gammon Field Travellers' Site has been considered in the ES chapters on Noise and Vibration, Air Quality and Population and Human Health, as appropriate.</p> <p>Further discussions will be carried out with the Council once these finalised documents have been shared.</p>	<p>ES Chapter 5 - Air Quality (6.1)</p> <p>ES Chapter 12 - Noise and Vibration (6.1)</p> <p>ES Chapter 13 - Population and Human Health (6.1)</p>	
Health inequalities	2.1.230	<p>The Council believe there is no clear information about what mitigation will be employed to reduce health inequalities. Health should be carried through to the impacts and in determining what mitigation is required to support and protect the health and wellbeing of local residents. Similarly clear</p>	<p>The HEqIA describes a range of measures that will help to overcome health inequality in the region. These include access to jobs and training as a result of construction of the project, which can have a direct positive impact on people's health. Other enhancements, including to the walking, cycling and horse-riding (WCH) network will similarly play a role in reducing health inequalities. The HEqIA has been updated to include a more detailed assessment of the duration of impacts; and</p>	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion

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		information about what mitigation will be employed to reduce health inequalities is needed. In the HEQIA, opportunities to 'improve health and quality of life' through legacy benefits be fully explored. National Highways also need to ensure these are not widened as an unintended consequence of the scheme.	to include reference to the Worklessness and Health Joint Strategic Needs Assessment (JSNA). Furthermore, health has been considered in reporting what mitigation is required to support and protect the health and wellbeing of local residents. Mitigation proposed in relation to a number of topic areas is considered to be effective in reducing health inequalities. Further discussions will be carried out with the Council once the finalised document has been shared.		
HEqIA and Noise Impact on Whitecroft Care Home	2.1.231	The Council note some significant noise impacts on the Whitecroft care home and appropriate mitigation is needed. Measures like noise barriers might not be the most appropriate for dealing with noise in an outdoor environment, especially when windows need to be kept open for ventilation.	Our assessment includes noise impacts on sensitive receptors such as the Whitecroft Care Home. Our engagement with the Care Home is ongoing. Further discussions will be carried out with the Council once the finalised ES chapter has been shared.	Environmental Statement Chapter 12 - Noise and Vibration (6.1)	Matter Under Discussion
Impact on mental health and wellbeing	2.1.232	The Council would like to understand what specific mitigation measures are proposed for supporting the mental health and wellbeing of people who have to leave their homes as a result of this project or face anxiety due to	We understand that there are mental health and wellbeing concerns among local residents and construction workers. The HEqIA specifically includes an assessment of mental health and wellbeing impacts using the mental health and wellbeing toolkit. National Highways have continued to discuss potential measures that might be appropriate to support the mental health and wellbeing of those impacted by the Project with	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion

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		<p>the environmental impacts. For example, Whitecroft Care Home.</p> <p>Consideration should also be given to the impact of the project on an individual's ability to make healthy choices. For e.g. the severance and disruption to PRow networks and the delays in journey times to access to key facilities could be detrimental especially for those who may be on low incomes or not have access to private transport</p>	<p>stakeholders. Many measures set out across the Control documents will contribute to a reduction in the adverse mental health impacts.</p> <p>Consideration is given in the updated HEqIA to the impacts of severance and disruption to PRow networks and delays in journey time to key facilities on people's health and wellbeing. Further discussions will be carried out with the Council once this finalised document has been shared.</p>		
Assumptions made around LTC's worker accommodation strategy	2.1.233	<p>The Council have some concerns on the assumptions used by LTC in developing their worker accommodation strategy</p> <p>1. LTC use the term 'bed spaces', which is distinctly different to 'bedrooms', which may account for additional bed spaces that could have been included in LTC's estimates.</p> <p>2. How was the figure of 400 or 480 on page 6 derived for on-site demand?</p>	<p>More details on each of these points is contained in the Worker Accommodation Report (WAR).</p> <p>1. The original analysis by National Highways was not based on the assumption that people would share rooms, and the available capacity (bed spaces) can also be read as (bedrooms). An element of the workforce, particularly those with specialist skill sets will be non-home-based (i.e. require temporary accommodation in the area). National Highways is keen to reduce this element of the workforce by implementing a Skills, Employment and Education Strategy (SEE Strategy), but recognise that some of the skill sets required for the project (particularly tunnelling) are very limited in the UK.</p> <p>2. The figures for onsite accommodation for tunnel workers (provision being made for up to 400 'normal'</p>	<p>Worker Accommodation Report (7.18)</p> <p>ES Chapter 13 - Population and Human Health (6.1)</p> <p>Health and Equalities Impact Assessment (7.10)</p>	Matter Under Discussion

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		<p>3. What is the percentage figure for home-based workers in key assumptions</p> <p>4. Potential reduction in emergency accommodation (BnBs etc.) available to homeless households needs to be assessed.</p>	<p>condition workers and up to 80 hyperbaric workers) is based on the specialist needs for the tunnelling labour and is provided within construction compound. This is based on National Highways' professional judgement and experience of construction schemes and predicted on the scale of the tunnelling operation to be undertaken.</p> <p>3. The WAR includes several key assumptions on the proportion of the workforce that is likely to need accommodation, and the types of accommodation they may seek. A conservative estimate of 75% (workers seeking temporary accommodation) had previously been used and formed part of the assumptions shared with Local Authorities in 2019. Since then, the Project has developed its understanding of the construction workforce, using other projects as benchmarks, and developed measures within the SEE Strategy to enhance local recruitment. As such, National Highways now consider that 35% is a more realistic assumption, however, this percentage figure is conservative and likely to be exceeded.</p> <p>4. The Project would welcome any information regarding the housing demand and pressures. Technical meetings with housing officers from authorities likely to host temporary construction workers have been undertaken to help the Project understand the scale of Local Authorities' use of private sector accommodation for emergency provision.</p> <p>National Highways have provided information on the workers accommodation strategy to the Council and discussed this in engagement meetings. Further</p>		

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			discussions will be carried out with the Council once the finalised documents have been shared.		
Impact LTC's worker accommodation strategy on existing and proposed housing	2.1.234	<p>New and existing housing supply in the Borough will be affected by the construction of the LTC. The Council estimates</p> <ol style="list-style-type: none"> 1. Up to 20 homes will be lost to make way for the construction of the LTC, 2. An additional 1,400 residential properties are estimated to be affected due to their proximity to LTC, 3. 160 dwellings are located within 200m of the LTC scheme, and a further 1,240 homes located within 500m. 4. Land with the potential for up to 3,500 new homes will either be lost or will see construction delayed due to the LTC, further affecting the ability of the Borough to meet its future housing needs. 	<p>The likely effects of the Project on private property and housing in relation to demolition and land-take (temporary and permanent) are assessed in ES Chapter 13, Section 13.6. Mitigation measures comprise financial compensation; however it is acknowledged that there are wider implications for local residents associated with the loss of private property (for example in relation to anxiety, or loss of community) and these issues are considered in more detail in the HEqIA.</p> <p>The likely effects of the Project on development land are also assessed in ES Chapter 13, and no significant effects are ascertained.</p> <p>Since April 2017, the owners of properties that are within the development boundary have been able to ask National Highways to buy their property by serving a blight notice. A property is considered blighted when its value is reduced as a result of the project and the owners are unable to sell the property at the value the property would have expected without the blight. National Highways purchase blighted properties at their unaffected market value; this is the amount the property would be worth if the project did not exist, not the blighted (lower) value.</p>	<p>Health and Equalities Impact Assessment (7.10)</p> <p>ES Chapter 13 - Population and Human Health (6.1)</p>	Matter Under Discussion
Impact of construction on worker numbers	2.1.235	The Council would expect National Highways to fully assess the impact of its	1. National Highways have assessed the impacts of construction workers in on the private rental market in the Worker Accommodation Report and what it would mean for with knock on impacts for housing affordability.	Worker Accommodation Report (7.18)	Matter Under Discussion

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on private rental market		<p>workers accommodation strategy on</p> <ol style="list-style-type: none"> 1. Rental market in Thurrock, with knock on impacts for housing affordability relating to the private rental market. 2. Knock on negative impact on health and wellbeing 	<p>Although the Project is unlikely to have an adverse impact on the local accommodation, National Highways have committed to an Accommodation Helpdesk, which is secured in the DCO by the FCTP. The Project recognises that there is some uncertainty around the modelling of workforce locations, as well as a dynamic and sensitive environment in terms of accommodation supply. While there is a sizeable amount of accommodation available, there may be localised risks of concentrations which the Project and Local Authorities may need to be aware of and respond to. The early creation of an effective Accommodation Helpdesk will not only identify and direct workers to appropriate accommodation but will be a key mechanism, together with the workforce surveys, to monitor impacts on the local accommodation market. Its is also likely to act as a means to signpost potential landlords and businesses to assist and encourage bringing forward of latent beds to the market. National Highways have discussed the principles of this helpdesk at CIPHAG (7th July 2022) and a further discussion with the housing officers at Thurrock was completed on the 18th August 2022. Further discussions on the scope and implementation of the Accommodation Helpdesk will follow.</p> <p>National Highways are committed to the creation and use of an accommodation database that would monitor the accommodation being used by the workforce in terms of type and location. A Workforce Accommodation Working Group would also be established which would include representatives from National Highways, contractors and local authorities. This group would receive monthly</p>	<p>Health and Equalities Impact Assessment (7.10) Framework Construction Travel Plan (7.13)</p>	

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			<p>workforce accommodation monitoring reports from the helpdesk and regular updates and information from the Project including a 'look ahead' for potential workforce implications over a 12-month period. The findings would be considered alongside other information such as other monitoring secured by the Project (e.g., via the FCTP and SEE strategy) and the information provided by the authorities on market conditions and other developments in the local area.</p> <p>2. The impacts on health and wellbeing are presented in the HEqIA</p> <p>Thurrock Council have seen the Project position set out above but are yet to provide feedback.</p>		
Impact of construction workers on health and other services and Public Health mitigation during construction	2.1.236 -	<p>The Council would like to understand the impacts on demand for healthcare and other services from construction workers residing in Thurrock</p> <p>1. There is an existing and growing demand and capacity gap for Primary Care Services in Thurrock. Therefore, accommodating additional demand from construction workers could exacerbate the issue reducing the access to health services of the existing resident population. The Council would expect National</p>	<p>An assessment has been undertaken on the demand for healthcare from construction workers residing in Thurrock. This has taken into account information provided by health stakeholders through the CIPHAG group. As a result of this work, National Highways has made the following commitment in the REAC (PH002) regarding the provision of medical services and occupational services to construction workers</p> <p><i>'The Contractor will provide an appropriate range of medical and occupational healthcare services (including on-site facilities) to meet the physical and mental health needs of the construction workforce. The range of services will be agreed with National Highways, following engagement with Integrated Care Partnerships'</i></p> <p>Within the Thurrock Integrated Care Partnerships - partners are Thurrock Council, NELFT, EPUT, Thurrock CCG, Directors from the four Primary Care Networks,</p>	<p>ES Chapter 13 - Population and Human Health (6.1)</p> <p>Code of Construction Practice including the Register of Environmental Actions and Commitments (6.3)</p> <p>Health and Equalities Impact</p>	Matter Under Discussion

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		<p>Highways to monitor the impact of the construction workforce on demand and access to health and other services such as social care, education and community services.</p> <p>2. Additional impacts on feelings of safety, crime and mental health and well-being all need to be addressed</p> <p>3. National Highways should also clarify what welfare facilities will be provided within the construction compounds and if there will be an on-site health facility. Given the scale of the proposal, the Council would expect welfare facilities to provided on site and for adequate healthcare provision (that meets the needs of the workforce) to be in place prior to works taking place.</p> <p>4. Additionally, the mental health and wellbeing of the construction workers themselves needs consideration, particularly if the intention is for some of them to be sourced from our local</p>	<p>Healthwatch, Thurrock CVS and Mid and South Essex Hospital Trust.</p> <p>Thurrock Council have seen the commitment set out above but feedback is awaited.</p> <p>The impact of the construction workforce on demand and access to healthcare has been assessed within the Environmental Statement and a measure has been incorporated into the REAC specifically to ensure that impacts on local healthcare services would be minimised. Impacts of the construction workforce on other community services are assessed in ES Chapter 13.</p> <p>The HEqIA also includes an assessment of the impacts of the Project on mental health and wellbeing, which incorporates factors such as feelings of safety and crime within the community during the construction phase. The mental health and wellbeing assessment will include consideration of the construction workers themselves. Further discussions will be carried out with the Council once the finalised HEqIA has been shared.</p>	Assessment (7.10)	

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		<p>populations. Mitigation could include funding for increased access to mental health support and services.</p> <p>Public Health mitigation measures would include the enhancement of public transport to healthcare facilities and the reinforcement of local NHS provision during the construction phase, in addition to providing welfare facilities for construction workers.</p>			
Comments on DCOV1 documents	2.1.237	<p>Comments on CoMMA, HEqIA and Distributional Impact Appraisal (DIA) Report</p> <p>1. The ComMA Appendix D Economic Appraisal Report states that the monetary disbenefit for Air Quality is - £6m. This appears to be the opposite of what is being reported in the Air Quality Chapter and Population and Human Health Chapter of the ES and the HEqIA. The Council would like updated GIS data for review to assess the air quality modelling.</p>	<p>The CoMMA, Health and Equalities Impact Assessment and Distributional Impact Appraisal Report have been updated and included in for the DCO application.</p> <p>The ComMA deals with a range of impacts (defined as Level 1, Level 2 and Level 3 impacts), including both benefits and disbenefits. Monetised environmental disbenefits are expressed within the ComMA and not repeated in the ES Chapters (air quality, landscape and noise). However, relevant qualitative assessments of disbenefits have been included in the relevant ES Chapters. Where relevant, these have been considered in the HEqIA (a summary of which has been included in ES Chapter 13). Relevant topics relate to road safety, physical activity, affordability and severance. Whilst the methods used in DMRB for the environmental assessment of air quality and TAG for the environmental appraisal of air quality are different, they are based on</p>	<p>Combined Modelling and Appraisal Report (7.7)</p> <p>ComMA - Appendix D - Distributional Impact Appraisal Report (7.7)</p> <p>ES Chapter 13 - Population and Human Health (6.1)</p> <p>Health and Equalities Impact</p>	Matter Under Discussion

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		<p>2. In the DIA, air quality only looks at income and children/schools and not older people who are more likely to have Long Term Conditions.</p> <p>3. In the DIA, the health inequalities are not being adequately mitigated and opportunities for benefit are not being maximised for those in the most deprived areas/experiencing the worst health outcomes.</p> <p>4. Air Quality – National Highways claim that LTC will improve the overall air quality across the region. The HEqIA submitted for the DCOv1 application, however, showed neutral impacts both regionally and in Thurrock despite there being localised worsenings in air quality in the Thurrock area. Updated GIS data should be provided to the Council for review to assess the air quality modelling for the revised transport model of this consultation as the summary provided in the Operations</p>	<p>the same underlying traffic forecasts and emissions factors. Therefore, the results reported in the ES and in the economic appraisal are compatible. National Highways will work with Thurrock Council to support them in analysing the assessments supplied following the DCO submission.</p> <p>Chapter 13 of the ES and the HEqIA have not taken into account disbenefits where they are expressed in monetary terms, for example journey time reliability disbenefits during the construction period; these are instead reported qualitatively using information from the Transport Assessment (TA). Section 7.2 of the HEqIA (Accessibility impacts and mitigation during construction) makes reference to journey time reliability disbenefits (these are referred to as increases in journey times) and information from the TA is explained in paragraphs 7.2.13 to 7.2.15 and Table 7.1.</p> <p>For example, disbenefits identified in the Distributional Impact Assessment (DIA) as they affect vulnerable populations are reported in the HEqIA (notably in relation to noise and severance during the operational phase). Social impacts described in the Appraisal Summary Tables of the ComMA have been carried across into the HEqIA where relevant. Disbenefits described in the DIA, for example with regard to noise impacts during operation, are described in paragraphs 7.7.45 and 7.7.47 of the HEqIA and are one of the areas of evidence which contribute to the health outcomes described in Table 7.24. At a local level, there are areas where noise improvements occur, which may translate into positive health outcomes; similarly there are negative health</p>	<p>Assessment (7.10) Transport Assessment (7.9)</p>	

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		Update relates to the withdrawn DCOv1 application.	outcomes for certain locations and these have been identified. Further discussions will be carried out with the Council once these finalised documents have been shared.		
Impact of possession of common land and private recreational facilities	2.1.238	<p>Some areas of common land and private recreational facilities will be possessed (temporarily or permanently) resulting in changes to the availability of open space including</p> <ul style="list-style-type: none"> • Temporary/ permanent purchase of land at private recreational facilities; • Purchase and de-register of common land at Walton Common and Parsonage Common; and • Temporary possession of land at Linford Allotments for construction of utility works, which will be restored to their existing use <p>Regarding the temporary/ permanent purchase of land</p>	<p>As noted in the comment, the Project will require temporary and permanent land take from areas including common land and private recreational facilities. We have worked with the Project's design team and stakeholders to ensure that effects are for limited durations where possible in order to reduce impacts on users of these areas and facilities. These impacts, together with proposed mitigation, are reported in ES Chapter 13 as well as in HEqIA Chapter 7 (under the headings of Access to Open Space and Access to Nature).</p> <p>The response also notes potential effects on the operation of the Wild Thyme Outdoors Centre which operates from The Wilderness (an area of private woodland, part of which will be lost to permanent land take). Impacts on private recreational facilities, which are not special category land, are considered in detail in Appendix G of the Planning Statement.</p>	<p>ES Chapter 13 - Population and Human Health (6.1)</p> <p>Health and Equalities Impact Assessment (7.10)</p> <p>Statement of Reasons (4.1)</p> <p>Planning Statement Appendix D – Open Space and Green Infrastructure Study (7.2)</p> <p>Planning Statement Appendix G –</p>	Matter Under Discussion

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		<p>occupied by private recreational facilities, this would have an adverse effect to health, equalities and wellbeing due to the closure of exercise and recreational facilities during construction and/ or operation of the LTC scheme. Although these closures are likely to have an adverse effect, the Council note that National Highways have taken care to ensure that the effects to the operation of these facilities is minimal, unlikely to affect their operation significantly. Where effects are anticipated, such as effects to the operation of the Wild Thyme Outdoors centre, discussions are ongoing with the landowners and operators to explore solutions in mitigating or compensating for the potential effect. Without clear commitments at this stage, it is difficult to assess the potential impacts in this case to health, equalities and wellbeing beyond being adverse.</p>		Private Recreational Facilities (7.2)	

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Comments on draft HEqIA	2.1.239	<p>The Council has submitted detailed comments on the draft HEqIA chapters (shared before DCOV1 submission, in Aug 2020) on the following matters. These will be revisited once the HEqIA documents are available as part of DCOV2</p> <ol style="list-style-type: none"> 1. noise, waste and dust management 2. welfare facilities, healthcare and other services 3. accessibility 4. access to open space and nature 5. air quality 6. noise and vibration 7. work and training 8. housing and worker accommodation 9. mental health and wellbeing 10. baseline conditions 	<p>These detailed comments have been taken into account as the HEqIA has been updated. These comments have been addressed in the HEqIA.</p> <p>Thurrock Council will check the validity of these comments and if they have been addressed to their satisfaction after the HEqIA has been shared.</p>	Health and Equalities Impact Assessment (7.10)	Matter Under Discussion
health impacts arising from construction	2.1.240	<p>Thurrock Council consider that there may be unacceptable health impacts at a number of locations arising from construction and operation. Subject to confirmation of the</p>	<p>The health impacts of the Project are set out in the HEqIA and ES Chapter 13. a Relevant mitigation measures for the whole route (including Orsett Ward) are set out in the CoCP and REAC. National Highways have reviewed the cumulative assessment as part of the HEqIA and additional mitigation has been included in the</p>	ES Chapter 13 – Population and Human Health (6.1) Health and Equalities	Matter Under Discussion

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on and operation		<p>impacts set out in the HEQIA, there are unacceptable impacts at:</p> <ol style="list-style-type: none"> 1. residential areas surrounding the A13 junction 2. Link between Orsett Cock roundabout and the A1089 	REAC where necessary. Further discussions will be carried out with the Council, once these finalised documents have been shared.	<p>Impact Assessment (7.10)</p> <p>Code of Construction Practice including the Register of Environmental Actions and Commitments (6.3)</p>	
Complete and improve the PRow network: PRow proposals sought within and outside of the LTC DCO	2.1.241	<p>Thurrock Council sent through detailed proposals around how LTC can complete and improve the PRow network. This discussion was split into two parts</p> <p>PRow proposals sought within the LTC DCO</p> <ol style="list-style-type: none"> 1) BR58 2) FP200 3) Link through Ron Evans Memorial Ground <p>PRow proposals sought outside the LTC DCO</p> <ol style="list-style-type: none"> 1) FP1 south of Dennises Lane 	<p>National Highways have worked very closely with the Council to work on all the proposals put forward to complete and improve the Public Right of Ways network within Thurrock. Commitments have been made in the Design Principles document/ Rights of Way & Access Plans as outlined below</p> <p>Public Right of Ways proposals within the Project DCO</p> <ul style="list-style-type: none"> • BR58; this is now enshrined within the Tilbury Fields proposals and connected to FP200, secured by the Rights of Way & Access Plans • FP200 – this has been upgraded to bridleway as requested by the Council, secured by the Rights of Way & Access Plans • Link through Ron Evans Memorial ground - The indicative route through the Ron Evans Memorial Field was presented and the Council have indicated that this is considered appropriate and 	<p>Design Principles (7.5)</p> <p>Rights of Way & Access Plans (2.7)</p>	Matter Agreed*

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		<p>2) Improved link north south links via the Gatehope route through Little Belhus to Dennis</p> <p>3) North south link on western side of M25 from Stifford Road to Bridleway 230 Belhus Chase</p> <p>4) Gatehope Drive to Dennis Road</p> <p>5) Aveley to Purfleet link,</p> <p>6) Mardyke bridge - Arena Essex</p> <p>7) Buckingham Hill Lane</p>	<p>would be supported. This would be secured by the Design Principles (S11.06) and the Rights of Way & Access Plans.</p> <p>Public Right of Way proposals outside the Project DCO but covered by Designated Funds</p> <p>All other Public Right of Way proposals requested by the Council were considered by the Benefits team, except the Mardyke proposal. A fund of £280,000 has been granted by the National Highways Designated Funds Programme for feasibility studies, which will be completed in 2022 followed by capital works applications for these proposals.</p> <p>Thurrock Council have seen the commitments set out above and marked the matter agreed.</p>		
PRoW proposals sought within the LTC DCO: Potential Improvements around the northern side of Baker Street	2.1.242	Thurrock Council sent through proposals around how LTC can complete and improve the PRoW network. The PRoW proposals sought within the LTC DCO included potential improvements around the northern side of Baker Street.	<p>National Highways investigated potential measures to improve PRoW provision on the northern side of Baker Street and shared this further information with the Council. A shared use concept was identified as the preferred potential measure.</p> <p>However, subject to undertaking further investigation, the Project, concluded that this measure was not feasible due to several issues including the loss of on-street residential parking.</p> <p>Furthermore, the works in this area do not provide mitigation for an adverse impact of the Project, and as a consequence it would not be appropriate to seek the powers through the Project DCO.</p>	N/A	Matter Not Agreed
Targets in the	2.1.243	The Council would like specific and stretch targets in the	The overarching aims and objectives of the FCTP are secured as commitments to be delivered by the Project.	Framework Construction	Matter Not Agreed

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Framework Construction Travel Plan (FCTP)		<p>FCTP to be adopted by contractors. These targets should cover a certain percentage of car trips (preferably trips made via EV), cycle trips, trips by foot, trips via public transport.</p> <p>For the Travel Plan to be effective there must be a robust and proactive commitment and governance from National Highways to be incorporated from Travel Plan Co-ordinators and Managers.</p>	<p>The FCTP sets out that, given the uncertainties, setting specific mode share targets at a Project-wide level is difficult especially prior to undertaking initial baseline travel surveys (which will provide real-world data from the Project's workforce). Therefore, we cannot currently produce this level of detail at this stage of project development. Project-wide targets would also be related to site-specific targets, which have not yet been prepared. The FCTP, however, sets out a framework and overarching principles for the future Site Specific Travel Plans (SSTPs). This approach would provide the flexibility required to respond to and adapt to changing conditions over the duration of the Project.</p> <p>As set out in the FCTP, all targets will be developed and included within the SSTPs in consultation with the relevant highway and local planning authorities. No part of the authorised development is to commence until a Site Specific Travel Plan for the construction of that part, which is substantially in accordance with the FCTP, has been submitted to and approved in writing by the Secretary of State.</p>	Travel Plan (7.13)	
FCTP Assumptions	2.1.244	<p>The Council has the following suggestions for the FCTP assumptions</p> <p>1. FCTP assumes 60-minute travel time for workers based at compounds. This should account for the time taken to access the origin station or bus service and the period to travel</p>	<p>The assumptions set out in the FCTP are indicative and designed to give an idea of the likely catchment.</p> <p>The accessibility maps are based on the morning peak period, with a start/end time of 07:00/09:00 for bus and rail network services. This morning peak has been used to represent the time period with the greatest level of transport services available, and therefore the time period that will be able to implement the greatest level of mode shift.</p>	Framework Construction Travel Plan (7.13)	Matter Not Agreed

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		<p>from the destination hub or bus stop, which would reduce the catchment for the two hubs.</p> <p>2. Compound shift arrangements should reflect availability and suitability of public transport services for worker commuting periods. Early and late tunnelling shift are not suited to public transport due to the early start or late finishes. How will these challenges be resolved without encouraging travel by private cars?</p>	<p>It should be noted that LTC is committed to developing SSTPs post DCO consent, if consent is granted, in line with the controls and commitments in the FCTP. Thurrock Council would be a consultee to the development of this document. The specific measures Thurrock Council are after, are for the SSTPs to address, as there is currently no information on where people will live, or the exact shift times, so it's not possible to robustly identify what modes people will use and to/from where.</p> <p>The FCTP, however, presents a framework for developing robust site-specific targets and influencing travel behaviour of the workforce through the post consent SSTPs. The key aims of the FCTP are to reduce the number of single- occupancy vehicle trips and encourage the uptake of sustainable and active modes of travel. It also presents key tasks required as a minimum to be achieved across all construction areas and compounds during the construction period (Table 10.1). These include a commitment to use of shuttle buses, car share schemes, maintenance of agreed walking/cycling routes and regular review of active travel facilities within the vicinity of each site.</p>		
Sustainable worker transport access	2.1.245	The Council seek sustainable worker transport access to construction sites	<p>The Project is committed to providing sustainable worker transport arrangements for access to its construction compounds. The following commitment was added to the Framework Construction Travel Plan</p> <p><i>'Minibus shuttle buses (using zero emission vehicles) will be used to provide connectivity to and from public transport hubs...'</i></p>	Framework Construction Travel Plan (7.13)	Matter Agreed*

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			Thurrock Council have seen the commitment set out above and marked the matter agreed		
Use the construction phase as an opportunity to trial innovative forms of worker transport measures	2.1.246	The Council would like National Highways to commit to a journey planner including lift share booking to help construction workers make better choices based upon price, health, air quality, etc. Following a review of National Highways position, the Council's position is that the FCTP lacks clear targets before, contains loosely defined measures, lacks incentives for contractors and relies on car travel.	The Project does not necessarily provide a journey planner 'app' as such, but there are multiple schemes proposed to be run by the Travel Plan Coordinator which would serve the same purpose. These include car park management and car share schemes, as well as the provision of a site-specific welcome pack, noticeboard and intranet/website page providing details of the Site Specific Travel Plan, key contacts, the measures in force at that particular construction area or compound, along with local public transport information. All of these measures will work together towards providing better journey planning and are included in the FCTP.	Framework Construction Travel Plan (7.13)	Matter Not Agreed
Use the construction phase as an opportunity to trial innovative forms of worker transport measures	2.1.247	The Council would like National Highways to commit to pool electric vehicles; travel between compounds should be done by zero emission means such as EVs.	The Project is committed to providing sustainable worker transport arrangements and can confirm that the shuttle buses that will provide inter compound connectivity will be EV/equivalent. Further discussions will be carried out with the Council once the finalised FCTP has been shared.	Framework Construction Travel Plan (7.13)	Matter Under Discussion

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Use the construction phase as an opportunity to trial innovative forms of worker transport measures	2.1.248	<p>The Council would like National Highways to commit to mobility hubs, enabling employees to travel in by rail, bus or car and switch to shuttle bus/DRT or e-bike to the construction compound or between construction compounds.</p> <p>Following a review of National Highways position, the Council welcome the commitment to shuttle buses. However, the Council seek more clarity around how this strategy will be realised, maintained and its ultimate effectiveness.</p>	<p>It is assumed by National Highways that due to the shuttle busses connecting to existing transport hubs on both sides of the river, a mobility hub would be created anyway. Shuttle buses would operate from existing transport hubs on both sides of the River Thames. These hubs are currently envisaged at Gravesend (Bus, HS1, National Rail), Grays (Bus, National Rail), Pitsea (Bus, National Rail) and Upminster (Bus, National Rail, London Underground, London Overground). Buses are currently expected to provide routes to each compound and inter-compound connectivity, although this will be determined as the Site Specific Travel Plans are brought forward and as agreed at the Travel Plan Liaison Group. These buses would be for Project workforce only. The commitment to shuttle buses is included in the Code of Construction Practice. Please see below against Item No. 2.1.251 with regards to the response regarding Demand Responsive Transport. The detail being sought by the council at this stage, could restrict the shuttle bus contractor from delivering a successful shuttle bus operational. National Highways are confident that we have provided a framework that would enable the success of the shuttle buses.</p>	Framework Construction Travel Plan (7.13)	Matter Not Agreed
Use the construction phase as an opportunity to trial innovative forms of	2.1.249	<p>The Council would like National Highways to Travel Incentives – to cycle, use public transport, life-share and use electric vehicles.</p> <p>Following a review of National Highways position, the Council's position is that the</p>	<p>KPIs and incentivisation will be matters discussed between National Highways and its Contractors post Contract award, and during the development of the SSTPs. National Highways will not require its contractors to provide incentives that promote active travel, as a commitment within the DCO application documents. However, the Project is committed to the development of</p>	Framework Construction Travel Plan (7.13)	Matter Not Agreed

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worker transport measures		lack of specific targets before DCO submission and incentives for contractors will discourage the delivery of the commitments in the FCTP.	the SSTPs, with suitable targets, in consultation with the relevant highway and local planning authorities.		
Use the construction phase as an opportunity to trial innovative forms of worker transport measures	2.1.250	<p>The Council would like National Highways to adopt smart management of shift patterns and gangs to minimise travel in peak hours and maximum opportunity to lift share.</p> <p>Following a review of National Highways position, the Council's position is that travel spreading will flatten the profile but may not help to discourage car travel. The management of shift patterns therefore needs to be 'smart' and not solely driven by construction profiles.</p>	<p>National Highways will not require its contractors to implement smart management of shift patterns and gangs for the purposes of travel demand management.</p> <p>The Code of Construction Practice provides a band of working hours that provides flexibility for arrival (to site) and departure times. By not being overly prescriptive with respect to arrival and departure times we will encourage a broader spread of arrivals / departures based on different attendance times for different roles which should reduce travel demand. Regardless of the shift times, the measure and targets which will be set in the SSTPs, will be implemented.</p>	Framework Construction Travel Plan (7.13)	Matter Not Agreed
Use the construction phase as an opportunity to trial innovative forms of worker	2.1.251	The Council would like National Highways to commit to Demand Responsive Transport (DRT) – partner with a provider to enable employees to book a service either from home (within a service area), hotel/temporary	The Project will not be requiring our contractors to implement Demand Responsive Transport however National Highways will include in the FCTP that the contractor will consider providing Demand Responsive Transport to and from local public transport hubs.	Framework Construction Travel Plan (7.13)	Matter Not Agreed

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transport measures		<p>accommodation or public transport interchange.</p> <p>Following a review of National Highways position, the Council's position is that the wording in the FCTP is weak. National Highways should provide sufficient appropriate opportunities for workers to travel by non-car modes. Without these complementary measures National Highways is effectively proposing that car travel is the primary means of access. The contractors should be required to demonstrate why DRT would not form part of the package of measures.</p>			
Use the construction phase as an opportunity to trial innovative forms of worker transport measures	2.1.252	<p>The Council would like National Highways to commit to new construction phase cycle infrastructure – providing a permanent scheme for community, when not accessing the LTC construction site/compounds.</p> <p>Following a review of National Highways position, the Council's position is that National Highways does not</p>	<p>The Project will not be upgrading local roads to the Lower Thames Crossing construction compounds for the purpose of encouraging active travel.</p> <p>Many of the proposed construction compounds/ULH are in locations with poor accessibility by foot and this is recognised within the FCTP. National Highways does not support our workforce using unlit or roads without footways as part of our home safe and well corporate aim. Provision of temporary/permanent active travel provision to these compounds would likely not deliver value for money, would have considerable environmental impact, and in the post construction scenario these</p>	N/A	Matter Not Agreed

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		support the use of unlit access routes and routes with no footways (CoCP Para 6.3.5 (a)). Therefore, the FCTP and SSTPs will not support active travel without alterations to the existing network. The FCTP and SSTP are therefore entirely reliant on a strategy of shared transport (bus, van or car based sharing) to reduce the impact of workforce travel on the network.	routes would not offer connectivity to places people would wish to travel to in numbers that would warrant this provision. However National Highways do not consider that the FCTP and SSTPs would be unsuccessful in reducing project workforce impact on the highway network. The SSTPs would be developed by the contractor and recognise the surroundings and context for each location they are developed for. Each SSTP would therefore present measures and targets that are tailored for that specific location. Thurrock Council would be a consultee to these SSTPs, when they are produced post consent, if consent is granted.		
Enable active travel to construction sites:	2.1.253	<p>The Council request funding from National Highways to support the continued operation of the Hubs (cycle hubs at Stanford le Hope and Tilbury) will secure the infrastructure for the community for the future and provide the infrastructure for LTC construction workers to cycle from the hubs to the construction compounds.</p> <p>Following a review of the National Highways position, it is the Council's opinion that without this funding, National Highways is demonstrating a</p>	The Project are not providing funding as they are not associated with the construction of the scheme.	N/A	Matter Not Agreed

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		lack of commitment to these methods of travel.			
Enable active travel to construction sites:	2.1.254	<p>The Council would like National Highways to provide further capital works to facilitate convenient, well-lit cycle and pedestrian access to each of construction compounds from surrounding residential areas and transport hubs.</p> <p>Following a review of the National Highways position, it is the Council's opinion that National Highways is demonstrating a lack of commitment to these methods of travel.</p>	<p>Section 6 of the FCTP, it sets out an extensive walking, cycling and horse-riding network (in proximity to the Project's construction sites) that could be expected to be used for a proportion of workforce travel. It is recognised, however, that this would be a limited proportion of workforce travel, especially for some compounds. Furthermore, it is not expected that a significant proportion of the Project workforce will cycle and walk to the construction sites due to the remote location of some of the compounds, the nature of working hours and shift patterns and the nature of work these staff will be undertaking.</p> <p>As stated above, in response to 2.1.252 under 'Use the construction phase as an opportunity to trial innovative forms of worker transport measures; the Project will not be upgrading local roads to the construction compounds for the purpose of encouraging active travel.</p>	Framework Construction Travel Plan (7.13)	Matter Not Agreed
Parking at Construction Compounds	2.1.255	The Council would like compound parking provision to be based on accessibility of compound location not as a percentage of the number of workers. Poor accessibility should not be a justification for high numbers of parking spaces but should lead to improvements in	<p>National Highways are unsure where this assumption has been made on parking provision.</p> <p>The FCTP states that the baseline mode share has been assumed based on the number of available parking spaces at each compound and the likely vehicle occupancy without FCTP measures in place, simply for modelling purposes. Furthermore,</p> <p>1. The Project Action Plan sets out the implementation of a car park management scheme which would seek to ensure car parking spaces meet demand (ideally reducing the number over time). This would be aligned</p>	Framework Construction Travel Plan (7.13)	Matter Not Agreed

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		<p>environmentally sustainable options.</p> <p>What mechanisms will be put in place to ensure parking does not cascade to other compounds and result in movement between compounds along the trace or disguised as essential inter-compound travel?</p>	<p>with planned shift patterns and workforce numbers for both onsite and offsite car parking and developed at least six months prior to construction.</p> <p>2. FCTP is already committed to controls such as a car share scheme, shuttle buses, car park management strategy and review of active travel facilities (Project Action Plan).</p> <p>The SSTPs will contain more details around this issue, for the compound and Utility Logistic Hubs (ULH) they cover. The SSTPs, would be developed post DCO consent, if consent is granted, in consultation with local authorities and in line with the controls and commitments set out in the FCTP.</p> <p>Thurrock Council disagree with the project position set out above and request specific targets to be developed before DCO submission.</p>		
Appropriate provision on LTC bridge crossings	2.1.256	<p>Ensuring that the proposed re-provision of bridges across the LTC, along existing corridors, deliver sufficient legacy provision to encourage active sustainable travel and support future growth.</p> <ol style="list-style-type: none"> 1. Hoford Road - 4m WCH provision sought 2. Farm Track and FP 79 - 3.5m WCH provision sought 3. A1013 over A1089 - 5m WCH provision sought 	<p>National Highways have now made the following WCH provision on all the bridges listed, as per Thurrock Council's request. The WCH provision on each of these bridges will be secured via a Design Principle.</p> <ol style="list-style-type: none"> 1. Hoford Road Green Bridge (S10.11)- 3.6m (this is a 3.6m shared pedestrian, cycling and horse-riding route shared with the carriageway; noting that this road is closed to motor vehicles) 2. Farm Track and FP 79 (S10.13)- 3.5m 3. A1013 over A1089 (S11.17)- 5m 4. Rectory Road (S11.16) - 8.5m 5. Green Lane (S12.16) - 4m 6. Farm Track and FP 136 (S12.17) - 4m 	Design Principles (7.5)	Matter Not Agreed

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		<p>4. Rectory Road - 8m WCH provision sought</p> <p>5. Green Lane - 4m WCH provision sought</p> <p>6. Farm Track and FP 136 - 4m WCH provision sought</p> <p>7. North Road - 5m WCH provision sought</p>	<p>7. North Road (S12.18)- 5m</p> <p>Thurrock Council have refused to comment on the adequacy of the WCH provision without full cross-sectional details and dimensions of these bridges. Although the WCH widths are what Thurrock Council asked for, this matter will remain under discussion till the design principles are shared (now shared) along with the confirmation of which standards will be used. National Highways consider this level of detail is a matter that should be addressed during detailed design.</p>		
Appropriate provision on LTC bridge crossings	2.1.257	<p>Ensuring that the proposed re-provision of bridges across the LTC, along existing corridors, deliver sufficient legacy provision to encourage active sustainable travel and support future growth.</p> <p>1. Muckingford Road – 5m WCH provision sought along with a 7m bus lane</p> <p>2. Brentwood Road - separate provision for WCH sought on the bridge</p> <p>3. FP 252 over LTC - 5m provision sought on the bridge</p> <p>4. FP 252 over Railway - 5m provision sought on the bridge</p> <p>5. Stifford Clays - 7m provision sought on the bridge, with a</p>	<p>National Highways are unable to provide the WCH provision sought by the Council due to the reasons listed below</p> <p>1.Muckingford Road Green Bridge (S10.10)- A 5m WCH provision has been made as requested by the Council. Although Thurrock Council want a 7m (2x3.5m) bus lane provision to facilitate its local plan aspirations of public transport connectivity, National Highways have not been provided with a firm commitment outlining a sound reasoning on why they are required, data evidence, or a delivery programme for these works to understand how these fits in with the construction of LTC. Provision of a bridge significantly wider than the east and western approaches would not be appropriate. Further, it is understood that any additional widening of the bridge would impact on the relocation of existing utilities. National Highways' review of Thurrock Council's public transport proposals have not identified this as a key connector route from policy documents reviewed to date. It is also not clear why a bus lane would be required at</p>	Design Principles (7.5)	Matter Not Agreed

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		<p>separate equestrian route provided</p> <p>6. A1013 over LTC - 5m WCH provision sought</p>	<p>this location given current and future vehicle flows do not appear excessive and unlikely to cause significant congestion. Furthermore, it is noted that to the east and west of proposed bridge, the carriageway width is limited by adjacent land use towards Chadwell St Mary and Linford, therefore the bus lane along Muckingford would only be over a short section which will not offer continuity of public transport provision.</p> <p>2. Brentwood Road - No WCH route provided on the bridge as a separate provision has made i.e. 2.75m verges have been provided. Currently there are no confirmed commitments that identify the need for pedestrian and cycle facilities along Brentwood Road. The Project are promoting an alternative route within the WCH strategy that connects Brentwood Road to the A1013 and Rectory Road via resurfaced footpaths, that are re-designated to bridleways, so available for all WCH. This would cross LTC via a new bridge. Provision of a bridge significantly wider than the east and western approaches would not be appropriate with potential tie-in issues. No details have been provided to justify the provision of pedestrian and cycle facilities along Brentwood Road nor a programme for delivery of the adjacent works required.</p> <p>3. FP 252 over LTC (S12.17)- The WCH width provided is 3.5m, not 5m. The widths provided are consistent with current design standards for a shared surface.</p> <p>4. FP 252 over Railway (S12.17)- The WCH width provided is 3.5m, not 5m. The widths provided are consistent with current design standards for a shared surface.</p>		

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			<p>5. Stifford Clays Road (S11.18)- Along Stifford Clays Road we are proposing to provide an extension to the existing pedestrian/cycle footway. This will be a combined pedestrian (2m) and cycling route (3m). Provision for equestrian users has not been provided. Consultation with the local riding school/stables identified that routes to the north are used, rather than Stifford Clays Road.</p> <p>6. A1013 over LTC (S11.17)- A 5m WCH provision has been made as requested by the Council. Although Thurrock Council want a 7m (2x3.5m) bus lane provision to facilitate its local plan aspirations of public transport connectivity, National Highways have not been provided with a firm commitment outlining a sound reasoning on why they are required, data evidence, or a delivery programme for these works to understand how these fits in with the construction of LTC. Provision of a bridge significantly wider than the east and western approaches would not be appropriate. Further, it is understood that any additional widening of the bridge would impact on the relocation of existing utilities (if any exist). National Highways' review of Thurrock Council's public transport proposals have not identified this as a key connector route from policy documents reviewed to date. It is also not clear why a bus lane would be required at this location given current and future vehicle flows do not appear excessive and unlikely to cause significant congestion.</p> <p>National Highways consider that the proposed provision of capacity on these bridges is proportional to the current and likely forecast usage. Increasing capacity on bridges</p>		

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			would lead to an increase in the requirement for land, and increased cost, which is not proportionate to the identified need.		
Delivery of the Two Forts Way Project (TFWP)	2.1.258	The Council would like LTC to complete the improvements to cycling and footpath provision for the Two Forts Way	National Highways have now funded and completed the scope works on Two Forts Way, as agreed with Thurrock Council. This comprised of fencing and signing the new route, as well as some minor areas of surfacing to ensure the route remains passible. National Highways are also committed to delivering the first phase of the Association of South Essex Local Authorities (ASELA) Coastal Path Project between Coalhouse Fort and Stanford-le-Hope using the Designated Funds Programme. It would comprise improvements to the existing public right of way along the north bank of the Thames, connecting into a number of wildlife sites. Thurrock Council have seen the commitments set out above and marked the matter agreed.	N/A	Matter Agreed
Safety of NMUs	2.1.259	Other impacts of the construction, operation and maintenance periods for the Project, such as fear and intimidation, safety and disruption should be assessed and suitable mitigation proposed. There is insufficient detail relating to the safety of NMUs or the details of the proposed complementary strategy to enhance opportunities to	Any replaced WCH routes will be designed as per relevant design and safety standards. In-line with the requirements of the Planning Act, and national and local policy and guidance, the Project will mitigate its effects in terms of severance, changes in amenity and temporary and permanent changes to the WCH network where a significant effect is identified. This has been primarily secured through embedded mitigation, for example where National Highways has included new road crossings or diverted or upgraded routes within the scheme. In other cases, National Highways is working with local authorities and other partners to consider alternative securing mechanisms –	ES Chapter 13 - Population and Human Health (6.1) Health and Equalities Assessment (HEqIA) (7.10)	Matter Under Discussion

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		encourage a move away from vehicular travel.	<p>such as Section 106 Agreements – for other works which may be outside of the Order Limits.</p> <p>Beyond that, National Highways has taken a precautionary and responsible approach to the wider WCH network in order to maintain and enhance the social and health benefits of good accessibility across WCH links. Where new public open space will be provided as part of the scheme, it has been considered in the context of how local communities will access it. National Highways recognises the importance of a coherent network of links that contribute to health and wellbeing and go beyond a simple 'identify and fix' approach to affected locations, and the changes to the network have been assessed in this way through the Chapter 13 of the ES, and through local level assessments within the HEqIA. The benefits of an uplift in access to active travel is a key component of the HEqIA.</p> <p>Assessments of the users of PRoW, including in terms of their Protected Characteristics at a community level, are set out within Chapter 13 of the ES and the HEqIA. Further discussions will be carried out with the Council once these finalised documents have been shared.</p>		
Road Drainage and Water Environment					
Flood risk mitigation and water quality improvement	2.1.260	The Council would like more information on the flood risk mitigation and water quality improvement measures used by LTC on the Project.	The project scope has been reviewed by the Environment Agency. This review covers all aspect of their regulation and includes on flood risk & water quality, which LTC does comply with their requirements and is documented with our Statement of Common Ground with	Code of Construction Practice including the Register of Environmental	Matter Agreed*

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through SuDS			<p>the Environment Agency which will be submitted as part of the DCO application.</p> <p>Sustainable drainage systems have been integrated into the operational surface water drainage design and the features are illustrated on the Environmental Masterplan. North of the river, drainage systems would generally discharge to surface watercourses via retention ponds and detention basins, with the exception of one infiltration basin at the A13/A1089 junction. The drainage strategy and its Sustainable drainage systems components is detailed in Part 7 of the Flood Risk Assessment. Water quality of highway run-off would be improved prior to discharge by means of separate lined sedimentation forebay and/or vortex separators located upstream of the infiltration basins and attenuation ponds/basins. In addition, penstock chambers are provided as emergency shut-off facilities. Sedimentation forebays would be utilised for containment of spillages (when the penstock is closed during an incident) and therefore would be lined to prevent escape of contaminants, in line with Register of Environmental Actions and Commitments reference RDWE034.</p> <p>A schedule of water quality treatment systems per infiltration basin is provided in Annex 1 of the Hydrogeological Risk Assessment.</p> <p>A schedule of water quality treatment systems per attenuation pond/basin is provided in Appendix 14.3 of the Environmental Statement.</p> <p>The adequacy of the treatment provided has been tested through application of both National Highways Water Risk Assessment Tool, the Construction Industry</p>	<p>Actions and Commitments (6.3)</p> <p>Flood Risk Assessment (6.3)</p> <p>ES Appendix 14.3</p> <p>Operational Surface Water Drainage Pollution Risk Assessment (6.3)</p> <p>ES Appendix 14.5</p> <p>Hydrogeological Risk Assessment (6.3)</p>	

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			<p>Research and Information Association Simple Index Approach, and detailed groundwater modelling. The results of these assessments are reported in Appendices 14.3 and 14.5 of the Environmental Statement.</p> <p>Thurrock Council have seen these commitments and marked the matter agreed.</p>		
Design matters related to flood risk mitigation and water quality improvement through SuDS	2.1.261	<p>As part of these discussions the Council have also sought more clarification/ commitment on some additional matters as listed below</p> <p>1) Consideration of local design standards, Essex SuDS Design Guide (2020)</p> <p>2 Assurance that the 'preliminary design' will be pushed through the detailed design stage and SuDS features won't be reduced in favour of value engineering. Confirmation that further detail will be submitted at the detailed design stage, demonstrating that the SuDS strategy meets all the LLFA's requirements and standards</p>	<p>1) As acknowledged in our technical engagement with Thurrock and Essex County Council on drainage matters, the Project has, through the sharing of a series of technical notes, demonstrated that the preliminary drainage design has considered, and meets the requirements of local drainage design requirements in additional to those of the Design Manual for Road and Bridges.</p> <p>2) It is key to note that the assessment of the effects of the Project on the watercourses that would receive drainage discharges (water quality and flood risk) is based on the preliminary drainage design. Surety that the detailed drainage design will deliver an equivalent degree of both attenuation and treatment of drainage discharges is provided by Requirement 8 of the DCO. It stipulates that no part of the authorised development is to commence until, for that part, written details of the surface water drainage system have been submitted and approved in writing by the Secretary of State following consultation with the relevant planning authority on matters related to its function. This requirement also states that the surface water drainage system must be constructed in accordance with the approved details and that where any amendments are proposed, the Secretary</p>	Draft Development Consent Order (3.1)	Matter Agreed*

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			<p>of State (following consultation with the relevant planning authority on matters related to its function) must be satisfied that these amendments would not give rise to any materially new or different environmental effects to those presented in the Environmental Statement. The Lead Local Flood Authorities (Thurrock) and Essex County Council would both be consulted as part of the discharge of this Requirement, therefore given the opportunity to review the detailed drainage design and provide comments on it, removing the risk of the final drainage scheme not achieving compliance with local drainage standards. This commitment provides the necessary safeguards to ensure that the detailed drainage design will deliver to both local and national drainage standards.</p> <p>Thurrock Council have seen these commitments and marked the matter agreed</p>		
Commitments related to flood risk mitigation and water quality improvement through SuDS	2.1.262	<p>As part of these discussions the Council have also sought more clarification/ commitment on some additional matters as listed below</p> <p>1) A greater commitment to use Open SuDS features, integrated into the landscape to deliver water quality requirements as these provide additional amenity and biodiversity benefits should be considered.</p>	<p>1) The commitment to use of Open Sustainable drainage systems features is secured by the Project's Design Principles and the Environmental Masterplan, which shows Open Sustainable drainage systems features included in the preliminary drainage design that provide for both attenuation and water quality treatment. A series of infiltration basins are shown to the south of the Thames, and a combination of attenuation basins, an infiltration basin and swales are shown to the north. Where this attenuation is provided via ponds, the ponds would be designed to appear as naturalistic elements within the wider landscape setting, with planting provided</p>	<p>Design Principles (7.5) Code of Construction Practice including the Register of Environmental Actions and Commitments (6.3) ES Figure 2.4 - Environmental</p>	Matter Agreed

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		2) Commitment wording (RDWE025) to better reflect the agreed assessment methodology that includes both the HEWRAT and CIRIA SiA assessment	<p>to soften edges where this is appropriate, this is secured by Design Principle LSP.17.</p> <p>2) The current wording of RDWE025 in the REAC is robust in securing the treatment necessary to prevent discharge of highway drainage causing detriment to the water quality of receiving watercourses. The preliminary drainage design has been assessed using HEWRAT, with verification undertaken using the Construction Industry Research and Information Association Social Impact Assessment methodology, the results of which have been shared with Essex Country Council. These results demonstrated that proposed treatment measures are sufficient. It is also noted that RDWE025 commits to further assessment to confirm treatment measures at the detailed design stage, informed by survey and sampling to define the flow regime and water quality of receiving watercourses.</p> <p>Thurrock Council have seen these commitments and marked the matter agreed.</p>	Masterplan (6.2)	
Future responsibilities of sea defences at Coalhouse Point	2.1.263	<p>Thurrock Council have been part of the discussion with the Environment Agency and LTC regarding future responsibilities of sea defences at Coalhouse Point. Discussions regarding the proposed water supply for the HRA and ecology mitigation which is proposed by LTC adjacent to Coalhouse Fort are</p>	<p>National Highways is considering options for ensuring a water supply to the Functionally Linked Land mitigation adjacent to Coalhouse Fort. The current proposal is to allow ingress of water from the River Thames through a water inlet with self-regulating valve, or equivalent.</p> <p>In parallel, a formal agreement is to be provided to Thurrock Council which seeks to gain a legal agreement to supply water from the existing infrastructure within the Coalhouse Fort moat.</p> <p>Further discussions will continue once this formal agreement has been shared with the Council.</p>	N/A	Matter Under Discussion

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		ongoing between the EA and LTC. Thurrock Council are engaging with National Highways to better understand these proposals and determine next steps and await further detail. In parallel, a formal agreement is anticipated to be needed to supply water from the existing infrastructure within the Coalhouse Fort moat.			
Climate and Carbon					
Responding to National Policy changes on Climate Change and Decarbonisation	2.1.264	The Council would like LTC recognise the urgency of the climate emergency, and the scale of ambition required to meet net zero carbon by 2050 in the UK. The current focus on only relieving congestion at Dartford is considered too narrow, potentially at the cost to local communities and with unresolved impacts. LTC helps to resolve one historic problem but creating creates new ones for Thurrock. National Highways, in doing so, is not observing the Governments	More information on how the Project aligns with the Transport Decarbonisation Plan is included within the Planning Statement and Carbon and Energy Management Plan. National Highways has completed a series of meetings between late 2021-mid 2022 to discuss the Project's approach to climate and carbon as well as wider innovative approaches being pursued by National Highways outside the DCO application. An update on climate and carbon related issues was provided to all local authorities including Thurrock Council at CIPHAG in April 2022. This was followed by a more detailed presentation in August 2022, covering carbon emissions related to both construction and operational phases of the Project as well as commitments made in the DCO	Planning Statement (7.2) Carbon and Energy Management Plan (7.19)	Matter Under Discussion

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		<p>own aspirations to decarbonise the transport network and LTC scheme objectives that also include supporting sustainable local development.</p> <p>LTC should assess the implications of the scheme to transport decarbonisation i.e. how the scheme might need to be adapted to respond to this challenge or to become an enabler of transport decarbonisation and green growth in the Thames Estuary using alternative modes and travel patterns. The proposals should clearly address how the scheme will support the 6 strategic priorities set out in the DfT's Transport Decarbonisation Plan and in particular, how the scheme will support and contribute to</p> <ol style="list-style-type: none"> 1. accelerating modal shift to shift to public and active transport, 2. decarbonise road transport/ reduce road user emissions, and 	<ol style="list-style-type: none"> 1. New walking and cycling infrastructure is proposed as part of the Project design to help improve connectivity and increase opportunities for active travel, thereby supporting sustainable development. New and improved routes include routes for recreational purposes and those which link people with jobs, services and facilities. 2. The DCO is being developed in accordance with national guidance and latest policy in road user emissions. As a consequence, the DCO submission is not linked to any further additional initiatives by National Highways generally or the Project locally relating to road user emissions. Through Project Rapid, National Highways are committed to increasing the number of rapid charging points at existing Motorway Service Areas on the Strategic Road Network. This will not be delivered at a Project level and would be delivered at a strategic regional/national level to ensure the most effective roll out to meet growing demand for EV infrastructure. 3. National Highways are also undertaking initiatives to develop new HGV solutions at a national level. National Highways recognise the responsibility of Local Authorities to develop local solutions for their residents and businesses and where National Highways can support Thurrock Council led programmes, we would be happy to get involved, such as through the Sustainable Travel Working Group. National Highways is currently under discussion with UK Power Networks (UKPN) to determine suitable opportunities, but these are outside the scope of the Project 		

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		<p>3. decarbonise how we get our goods.</p> <p>There are multiple benefits of taking action to reduce carbon (especially around reduction in cost of delivery & maintenance of infrastructure, active travel, lower congestion, better air quality, reduction in noise, improvements to health) and these should be priorities for the project.</p>			
Responding to National Highways' Net Zero Plan	2.1.265	<p>The LTC proposals need to be reviewed in light of National Highways' Net Zero Plan and its associated commitments.</p> <p>Thurrock Council consider there are important questions to consider about how freight movement on the strategic road network will develop and what consequences this might have for the operation of the SRN. For example, encouraging the development of a hydrogen network for freight and construction vehicles, developing locations for intermodal and last mile connections (including transfer to river transport), and</p>	<p>The DCO application (ES Chapter 15 and Carbon & Energy Management Plan) demonstrates how Lower Thames Crossing is aligned to the National Highways' Net Zero Plan (and consequently to the government's own target for 2050), which sets ambitious targets for corporate emissions, maintenance and construction emissions, road-user emissions and follows a trajectory towards achieving net zero by 2050.</p> <p>The Project is committed to promoting low carbon innovation and approaches. On completion, it will be demonstrated that LTC has achieved its low emission aims and is aligned to the National Highways' Net Zero Plan's highways trajectory of a 40-50% reduction in emissions in the construction year 2030. This is a challenging target, and one that National Highways are committed to. The ES Chapter 15 and Carbon & Energy Management Plan demonstrate how the Project has adopted market leading practice to align with the</p>	ES Chapter 15 - Climate (6.1) Carbon and Energy Management Plan (7.19)	Matter Under Discussion

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		delivering enabling roadside technology, (such as the development of HGV platooning technology) to support improved logistics functionality and operation should also be explored, thus enabling safety and environmental gains.	<p>emissions reduction trajectory required to achieve the government's 2050 aspirations.</p> <p>Within the Carbon & Energy Management Plan, the Project presents its low carbon position in the form of a detailed emissions baseline calculation. This takes account of emission savings based on today's best practice and availability of low carbon technologies / materials and applies to both the construction and operation phase. This sets the baseline position on GHG emissions for the construction and operation phases and forms the worst-case scenario assessed in the EIA.</p> <p>National Highways is undertaking further discussions to develop ambitious approaches to carbon reduction. For e.g. National Highways is under discussions with plant manufacturers and specialists in the Thames Estuary area to explore the practicalities of using hydrogen fuelling on site and other alternative energy sources. This will continue outside of the DCO application process, as something that National Highways considers may present a genuine alternative to fossil fuel for site plant. However due to the nature of these discussions in this evolving environment, there is insufficient detail to make this part of the DCO application.</p>		
Future changes in vehicle use due to electrification	2.1.266	The Council notes that the 6th Carbon Budget Methodology report (published by the Climate Change Committee) identifies vehicle electrification, and the introduction of CAV technology will result in	Over the last year, there has been regular engagement with Thurrock Council regarding LTC's approach to climate change and carbon reduction. These have included discussion of how these issues will be addressed in the DCO submission, as well as the broader opportunities that National Highways is working on, primarily for the construction phase of the project.	Carbon and Energy Management Plan (7.19)	Matter Not Agreed

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		<p>significant impact on road transportation (including increases), on the basis of assumptions made. The Council queries:</p> <ol style="list-style-type: none"> 1. Are these good outcomes for carbon reduction and community cohesion? 2. What assumptions would need to be made to secure reductions in single vehicle use, and how might these apply to the road user charging regime for LTC? 3. How could the operational regime be used to create positive outcomes from a carbon and community perspective? <p>The Council has seen no assessment of uncertainty as part of the development of this scheme, and no evidence of proposals that could suggest that LTC could become a transformational project.</p>	<p>There are currently no plans to use charge specifically to target carbon and this is a policy matter for government, outside the remit of Project.</p> <p>The Project is aiming to be aligned with the National Highways net zero plan, which sets ambitious targets for corporate emissions, maintenance and construction emissions, road-user emissions and follows a trajectory towards achieving net zero by 2050. The Carbon and Energy Management Plan sets out the framework which the Contractor will be required to adopt to ensure continued identification of low carbon opportunities and low carbon innovation during the detailed design and construction phases.</p>		
Developing a suitable framework	2.1.267	LTC needs to provide clear commitments to decarbonising the scheme throughout its lifecycle. The current LTC	The aim is to make the Project compliant with National Highways Net Zero Plan. To illustrate the interventions that are going to make this possible, the DCO application includes a detailed Carbon & Energy Management Plan.	Carbon and Energy Management Plan (7.19)	Matter Agreed, subject to review of

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for carbon commitments secured via the DCO		<p>scheme and the associated climate change impacts appear to be inconsistent with the 78% Carbon Reduction by 2035, and its subsequent Carbon Budget Orders of 2021.</p> <p>National Highways has previously said the DCO commitments on carbon will be stronger and more comprehensive but have expressed concern about committing to delivering outcomes that are inherently uncertain. However, the Council would like to set broad objectives and a framework for future action secured through the DCO. At present, there is nothing which acts as an incentive on National Highways to make a concerted effort to be progressive on this agenda, and the Council believes that this needs to be grasped.</p> <p>For example, National Highways could go further to improve conditions/outcomes, for example, including an incentive for more ambitious</p>	<p>This document sets out the necessary framework and clear commitments which the Contractor will be required to adopt to ensure continued identification of low carbon opportunities and low carbon innovation during the detailed design and construction phases.</p> <p>Some of the stronger, more comprehensive commitments include:</p> <p><i>CBN08 - The Applicant will require Contractors to provide and maintain electric vehicle charging facilities, using zero carbon electricity, for 30% of parking capacity in each compound, increasing this as necessary to satisfy demand. CBN09 – The Applicant will require Contractors to use zero tailpipe emission vehicles for all staff movements within the working areas of compounds and to and from public transport hubs. CBN10 – The Applicant will require Contractors to promote the use of active transport for personnel to and from the compounds and to provide managed electric charging facilities for e-bikes at each compound, in covered cycle parking areas, to satisfy demand.</i></p> <p>Incentivisation is covered by the following commitments</p> <p><i>CBN11 - The Applicant will provide commercial incentives for Contractors to reduce emissions below the maximum level of emissions (as set out in CBN04)</i></p> <p><i>CBN12 - The Applicant will include a contractual mechanism that allows Contractors to be paid the additional costs of implementing agreed carbon reduction technologies, together with an incentive payment to further encourage their identification and adoption</i></p>	Code of Construction Practice including the Register of Environmental Actions and Commitments (6.3)	DCO documents

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		carbon reduction targets should be included beyond that stated in REAC items CC002 (GHG emissions reductions from the carbon model baseline)	National Highways are investigating the potential for a hydrogen supply to the construction compounds and have promoted the concept of using hydrogen as a diesel replacement, to their contractors as outlined in the CoCP. Thurrock Council are agreed in principle with the position set out above, but would like to review the DCO documents before formally agreeing this matter.		
Reduction of carbon during construction	2.1.268	<p>The Council seeks clarity on</p> <ol style="list-style-type: none"> How 'new standards for reducing carbon during construction' have been incorporated into the design of these local refinements and carbon reduction has been achieved through these design changes. The standards need to be enforceable by National Highways. National Highways should include a Low Emissions Strategy for Construction in the DCO Since autumn 2021, National Highways have been in discussions about wider ambitions and innovation measures to address climate change and decarbonisation, including with the TEGB and supply chains. These 	<ol style="list-style-type: none"> Details of LTC proposals for reducing carbon emissions in relation to construction were shared with the Local Authorities on Tuesday 2nd August during the "Local Authority Carbon Update". The Project's carbon commitments are set out in the Carbon and Energy Management Plan. National Highways consider that the provision of new standards for reducing carbon during construction will be an ongoing process and that discussions with the Council will continue until the completion of the project. <p>National Highways have maintained the principles of carbon reduction through all changes in the design, e.g., the placement of materials close to or within the footprint of the north portal area, to reduce carbon footprint and double handling. The Project is also committed to delivering carbon literacy training and achieving silver level certification from the carbon literacy project to develop a skills syllabus to support low carbon construction. It will work with partners including local educational institutions and the Supply Chain Sustainability School.</p> <ol style="list-style-type: none"> The Project's lowest carbon strategy, set out in the Carbon & Energy Management Plan describes 	Carbon and Energy Management Plan (7.19)	Matter Under Discussion

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		<p>discussions are welcomed by the Council, but there is still a lack of clarity in terms of commitments that will be incorporated within the DCOv2 application. The Council would expect to see details of what infrastructure will be included within the DCO to enable carbon neutral construction (for example power infrastructure scaled and sited for electrification of construction equipment, or spatial planning of new fuels, such as hydrogen).</p>	<p>commercial and management mechanisms by which the Project would continue to make improvements in carbon performance through following a PAS2080 carbon management system and ongoing innovations</p> <p>3. There is currently no clear precedent for the implementation of specific carbon neutral construction technologies e.g. use of hydrogen for fuelling a large plant at a construction site. As such, any delivery of this would have to be delivered collaboratively with the contractor / supplier / regulator, and in this evolving environment, there is insufficient detail to make this part of the DCO application. To achieve this, National Highways would need to know what plant will be available in two to three years' time, the physical requirements necessary and then do a spatial analysis of our construction sites to determine what might be necessary to deliver. Commitment (CBN07) as included in the Carbon & Energy Management Plan states:</p> <p><i>The Applicant will require Contractors to procure renewable electricity throughout construction, to meet any demand that is not met through onsite renewables and will provide Renewable Energy Guarantee of Origin (REGO) certificates covering the total amount of electricity consumed.</i></p> <p>Further discussions will be carried out with the Council once these finalised documents have been shared. In addition, National Highways will continue to:</p> <ul style="list-style-type: none"> a. Work with contractors / equipment suppliers to promote the use of alternative fuels b. Work with hydrogen and hydrogen equipment suppliers to understand technical requirements (size of 		

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			facility, safety offsets), all so that National Highways are ready to support the contractors with delivery when they start on-site.		
Use of best-in-class energy efficient systems	2.1.269	The Council would like LTC to commit to best-in-class energy efficient systems for the operational phase of the Project.	<p>The Project is committed to using the best-in-class energy efficient systems for its operations and the following commitments are included in the DCO application documents for both construction and operational phases</p> <p>The CoCP says- <i>'The Contractor will achieve a CEEQUAL 'Very Good' standard by completion of their works and support National Highways in achieving a Project standard of 'Excellent'</i></p> <p>The Carbon and Energy Management Plan includes the following commitments:</p> <p>CBN13,14 & 15 - <i>'The Applicant will obtain PAS 2080 certification for the Project from an independent, UKAS accredited third-party certification body and will maintain the certification annually. The Applicant will require subcontractors to obtain PAS 2080 certification from an independent, UKAS accredited third-party certification body within 52 weeks of the contract starting date and will maintain the certification annually. The Applicant will require subcontractors to obtain PAS 2080 certification within 52 weeks of appointment, unless otherwise agreed by the Applicant'</i></p> <p>Furthermore, the Carbon and Energy Management Plan states that the applicant will continue to engage with industry partners to seek to reduce carbon emissions during the operation of the Project. The Applicant has included a requirement in the draft Development Consent</p>	Code of Construction Practice including the Register of Environmental Actions and Commitments (6.3) Carbon and Energy Management Plan (7.19)	Matter Agreed*

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			<p>Order, which would require it to prepare and submit for the approval of the Secretary of State a third iteration of the Carbon and Energy Management Plan. The Carbon and Energy Management Plan includes the following commitments:</p> <p><i>CBN04 – The Applicant will develop and, where appropriate, implement measures to avoid / prevent, reduce and remediate emissions arising from the construction of the Project to ensure that net construction emissions do not exceed 1.763 million tCO₂e.</i></p> <p><i>CBN16 – The Applicant will publish an annual carbon report that will include information on forecast life cycle carbon emissions, carbon reductions and progress against carbon commitments as well as key actions and targets for the following year.</i></p> <p><i>CBN22 – The Applicant will publish a third iteration of this Carbon and Energy Management Plan explaining how carbon emissions will be managed and minimised during the operation and maintenance of the Project, to support the Applicant's carbon policies, plans and strategies. This would include measures such as the use of low energy lights.</i></p> <p>Thurrock Council have seen these commitments and marked the matter agreed.</p>		
Building in climate resilience and maximising carbon	2.1.270	The Council welcome the creation of new habitats and the benefits they will bring. Further information is required to understand the following :	The oLEMP will ensure any planting established will be successful and deal with the challenges of climate change. The approach to planting will be agreed by stakeholders in the oLEMP advisory group, post consent, if consent is granted. There is a monitoring and aftercare period during which the contractor is responsible for	Outline Landscape and Environment Management	Matter Agreed, subject to review of DCO documents

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sequestration in new habitats		<p>1. How are these habitat proposals designed to achieve benefits such climate change resilience.</p> <p>2. How will they in turn be established to be resilient to the impacts of climate change? (for example, noting comments regarding landscaping and tree planting on high bunds and irrigation challenges, which may be exacerbated by future climate change).</p> <p>3. How will the commitments made in DCOv2 ensure habitat design and delivery will maximise carbon sequestration where appropriate balanced against good design for nature recovery.</p>	<p>ensuring vegetation is successfully established. Further robust arrangements will be put in place for long term management.</p> <p>The planting of landscaping and compensatory habitats is secured through the Environmental Masterplan, Design Principles document and oLEMP. The oLEMP includes provision for the oLEMP advisory group to oversee the planting detailed design and implementation. The advisory group will have the opportunity to consider carbon sequestration in the detailed design.</p> <p>Thurrock Council are agreed in principle with the position set out above but would like to review the DCO documents before formally agreeing this matter.</p>	<p>Plan (oLEMP) (6.7)</p> <p>ES Figure 2.4 - Environmental Masterplan (6.2)</p> <p>Design Principles (7.5)</p>	
Specific comments on DCOV1 submissions	2.1.271	<p>1. The GHG emission calculations of 5.98M tCO₂e over the 60-year appraisal period - these calculations and results should be provided to the Council.</p> <p>2. Further information is needed to have a clear understanding of the spatial scope of the operational</p>	<p>A response to the issues is provided below. Further discussions will be carried out with the Council once the finalised ES Chapter 15 and the Carbon and Energy Plan have been shared.</p> <p>1. The figures for the operational phase road user traffic emissions are calculated by using WebTAG and the Emissions Factor Toolkit and cover the appraisal period of 60 years from the opening year. The latest Emissions Factor Toolkit was used for the assessment in the DCO application. It reflects some electrification of the fleet and</p>	<p>ES Chapter 15 - Climate (6.1)</p> <p>Carbon and Energy Management Plan (first iteration) (7.19)</p>	Matter Under Discussion

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		<p>assessment of traffic, and to understand the associated GHG assessment conclusions.</p> <p>3. In the Carbon and Energy Plan, we would expect estimates to be made of emissions reduction through phased/ increased use of electric vehicles. We would also anticipate calculations to be included of carbon emissions reduction of operational mitigation measures</p> <p>4. The mitigation measures included are high level and specific measures relevant to Thurrock should be clarified, for example in relation to the landscape design and GHG emissions offset, and specific measures to maintain existing and provide new connectivity for walkers, cyclists and horse-riders.</p>	<p>we anticipate that the calculated road traffic emissions will be further reduced. The latest appraisal on the operational phase road user traffic emissions is included in the ES Chapter 15 : Climate together with a clearer definition of the model's spatial scope. In addition to the modelled values, analysis is included within this ES chapter on the potential impacts of the DfT's Transport Decarbonisation Plan on the operational phase emissions.</p> <p>2. The Project's transport model covers the whole of England, Wales and Scotland, but more comprehensively so in Dartford, Thurrock, Kent, Essex and London. This is set out in the Transport Assessment and the ES Chapter 15, as well as consultation materials - most recently the Operations Update at the Community Impacts Consultation. The GHG assessment conclusions are presented in ES Chapter 15.</p> <p>3. During construction, there will be provision for contractors to use electric vehicles on the local road network, and electric hybrid and hydrogen plant on site. The Carbon and Energy Management Plan details the measures embedded within the carbon baseline to reduce GHG emissions as well as the processes and procedures that the Contractors would be required to follow to ensure continued carbon performance. The Carbon and Energy Management Plan includes the following commitments:</p> <p><i>CBN08 - The Applicant will require Contractors to provide and maintain electric vehicle charging facilities, using zero carbon electricity, for 30% of parking capacity in</i></p>		

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			<p>each compound, increasing this as necessary to satisfy demand.</p> <p>CBN10 – The Applicant will require Contractors to promote the use of active transport for personnel to and from the compounds and to provide managed electric charging facilities for e-bikes at each compound, in covered cycle parking areas, to satisfy demand.</p> <p>4. GHG emissions offsets through using WCH provision would be negligible in comparison to LTC journeys. Land-use change emissions have been calculated and show a positive benefit.</p>		
Nitrogen Deposition					
Nitrogen Deposition, Assessment and Methodology	2.1.272	<p>The Council seek the following details</p> <p>1. Detail regarding the methodology for quantifying the predicted emissions or for determining what levels of mitigation would be required. As a result, it is not possible to assess the robustness of the assessment and proposed mitigation and compensation.</p> <p>2. The mitigation hierarchy requires that avoidance and mitigation be fully considered before compensation measures are adopted as a final level.</p>	<p>National Highways has been at the forefront of developing best practice related to compensating impacts arising from nitrogen deposition; with the Lower Thames Crossing being one of the first National Highways projects to identify the impacts of nitrogen deposition and propose compensation. This issue has come forward as a result of a change (advancement) in government guidance on nitrogen deposition (NDEP). The impacts of the Project have not changed as a result. Our understanding of the effects the Project might have on plants and soils in certain environmentally sensitive areas has been progressed. National Highways have worked with Natural England (NE) to be the first to create a much more robust model around the effects of nitrogen deposition – in essence we now understand our potential impacts far better than we did.</p> <p>National Highways' approach to determining the scale of compensation required to address the potential impact of</p>	ES Chapter 8 - Terrestrial Biodiversity (6.1)	Matter Under Discussion

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		<p>3. No detail has been provided setting out the reasoning why measures such as lower speed limits could not be enforced along the route.</p> <p>The Council wishes to see the detailed evidence justifying the proposed approach/ methodology.</p>	<p>NDEP on designated sites and habitat is, as required, proportionate and appropriate to the significance of the effects assessed. Key to this is the consideration of the character of the impact on designated sites and habitats. This would occur as a potential degradation in habitat quality rather than a direct loss of habitat, and therefore the scale of compensation reflects this.</p> <p>National Highways have discussed this approach with NE, both in terms of the scale of compensation provision and also its location, focusing on a landscape-scale approach rather than more localised site-based measures, which are considered less effective or certain in their benefit. NE have responded in support of the approach we have taken.</p> <p>These detailed comments are noted and are addressed in ES Chapter 8: Terrestrial Biodiversity. Further discussions will be carried out with the Council once this finalised chapter has been shared.</p>		
Nitrogen Deposition , DCO Requirement	2.1.273	<p>It is essential that Thurrock Council are involved in development work to ensure that these schemes deliver appropriate new habitat and wider green infrastructure benefits that accord with the Council's emerging Local Plan. We therefore request an additional DCO Requirement to cover such controls and discussions.</p>	<p>The detailed design of the new habitat on the Nitrogen Deposition compensation sites will be developed through the Landscape and Ecological Management Plan (LEMP). The LEMP will be developed post consent, if consent is granted, and would reflect the Design Principles document, and mitigation measures set out in the REAC and will be based on the Environmental Masterplan contained in the Environmental Statement. The LEMP would be developed in consultation with the landowner, Local Authority and approved by the Secretary of State secured through Requirement 5 of the draft Development Consent Order.</p>	Draft Development Consent Order (3.1)	Matter Not Agreed

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
			The Council disagree with the position as they want to approve the LEMP rather than be a consultee to this document.		
Protective Provisions					
Work on flood defences	2.1.274	Thurrock Council, as the local flood authority, have reviewed the proposed Protective Provisions. The Council are concerned that there is not sufficient information on the obligations on National Highways to undertake works on flood defences damaged as a result of the Project.	The approach taken to development of the protective provisions for the protection of drainage authorities has considered precedent approaches taken by other projects. National Highways will be responsible for any works on flood defences and will have to follow the relevant approvals process. Thurrock Council are yet to confirm if they are satisfied with this Project position.	N/A	Matter Under Discussion
Legacy items beyond the scope of the Project					
Smart speed limits	2.1.275	The Project should set smart speed limits on the LTC that can respond to traffic flows and pollutant concentrations.	This request was declined by National Highways on 2 March 2021. However, this could be developed through the life of the project. Although the infrastructure will be capable of doing this, there will be knock on impacts on the rest of the road network both locally and nationally that would need to be considered for this proposal to be implemented. It would therefore have to be developed as part of a regional strategy with National Highways, Essex, Kent and Thurrock and is considered beyond the scope of the DCO application.	N/A	Matter Not Agreed

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
Hypothecation of LTC tolls	2.1.276	The Project should ensure a fixed proportion of LTC tolls are hypothecated to support projects within Thurrock.	This request was declined by National Highways on 2 March 2021. This is outside National Highways control and would need to be taken up directly with the Department for Transport. A hypothecated funding to support would be complex and novel within the UK, and therefore unlikely to be successful as described.	N/A	Matter Not Agreed
Bus access at the operational access (at Tilbury)	2.1.277	It's the Council's opinion that the operational access (at Tilbury) opens an opportunity for bus access which the LTC doesn't currently provide.	<p>National Highways have provided for an operations and emergency access at Tilbury, and not a junction open to the public. This operations and emergency access has not been designed specifically for any particular future connection into the local road network, however if the Local Authority or a third-party stakeholder is considering any future development they would need to liaise with National Highways Spatial Planning to develop their proposals and follow the relevant planning process at the appropriate time.</p> <p>Consideration of the use of the emergency access points onto Lower Thames Crossing has been made and it has been determined that their use in this way would not be possible. There are plans to work together collaboratively to help bring forward the Tilbury Link Road which would be able to provide additional network connectivity, particularly for local buses.</p> <p>The opportunity to provide a link for new bus services across the Thames between North Kent and Thurrock/South Essex, could provide a significant change in public transport connectivity across the Thames. The positive impact would extend to the Dartford Crossing which is forecast to see journey time reliability increase, and journey times reduce as a result</p>	N/A	Matter Not Agreed

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			<p>of the Project. The whole of the Project route is accessible to local and longer distance public transport routes, if operators choose to make use of it.</p> <p>National Highways consider local authorities best placed to lead on the development and appraisal of future public transport projects. They also have strong existing relationships and lines of communication with commercial bus operators as part of Local Transport Authority duties. National Highways is of course willing to work with authorities where appropriate. National Highways has established a Sustainable Transport Working Group (STWG) in parallel to the Project, with its primary purposes to maximise the benefits of the new crossing and develop sustainable travel initiatives that could be eligible for National Highways' designated funds and to support cases for future investment. Should the Project gain consent, National Highways will use the STWG up until opening as a forum to engage Local Authorities and operators to build awareness and develop improvements to existing commercial services and potential new services to make best use of the opportunities provided by the new crossing. National Highways considers that supporting this collaboration between Local Authorities on both sides of the Thames is the most effective and sustainable solution and this ask is beyond the scope of the LTC DCO.</p>		
Passive Provision at South Ockendon	2.1.278	It is Thurrock Council's opinion that the LTC scheme either severs or impacts access to a number of potential housing and employment growth areas	The Order limits for the Project have been developed looking at what is necessary and proportionate to enable the delivery of the Project only. The Project is not permitted to seek any land, rights or works powers that are not explicitly required for the delivery of the Project,	Book of Plans (Volume 2) Draft Development	Matter under Discussion

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		<p>in Thurrock including at Ockendon. Therefore, LTC should confirm that 'passive provision' for an interchange on LTC between North and South Ockendon is acceptable and that the LTC would be configured not to preclude that aspiration.</p> <p>Therefore, Thurrock Council would like the</p> <ol style="list-style-type: none"> 1. DCO to include provision for the non-preclusion zones within its Plans for Approval and 2. This passive provision should be legally secured within a separate legal agreement that is finalised and signed prior to DCO re-submission. 	<p>as per Ministry of Housing, Communities and Local Government guidance on both compulsory acquisition and associated development (as defined in section 115 of the Planning Act 2008)</p> <p>The position on the passive provision of junctions is therefore that the Project will seek to ensure that the proposed design of the Project does not preclude the potential for future junctions. The Project will use reasonable endeavours to ensure that potential locations for future junctions, are kept as clear as reasonably practicable of any unnecessary obstructions such as major utility diversions or significant permanent structures. This passive provision is embedded within the Project design which is already secured via Requirement 3 contained in Schedule 2 to the DCO. The Project will not be seeking any separate legal agreement around passive provision as the securing mechanism is already in place. The Project have also provided further clarification of the terms such as significant permanent structures, major utility diversions, unnecessary obstructions, as reasonably practicable on the Council's request.</p> <p>Any links to the Project which do not form part of the Project, (including a connection at Ockenden), will require their own planning consent (and associated approvals and appropriate assessment work). In line with the processes in place for any development which could affect the operation of the strategic road network, there will be ongoing engagement with, and evaluation by, the National Highways Spatial Planning Team.</p>	Consent Order (3.1)	

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
Upgrading Medebridge Road	2.1.279	The Project should deliver the proposed construction haul road along Medebridge Road alignment from the A13 to Grangewater to a sufficient width and standard to enable it to be adopted by the council	The LTC team has had discussions with Thurrock Council about the proposed use of Medebridge Road as a haul road. The powers proposed within the draft DCO are limited to those required for its safe use as a haul road. National Highways and Thurrock Council are currently discussing an opportunity to undertake additional works along this road, increasing the scope of works along this road to support the local development aspirations. Any such works would not be undertaken in support of the construction of Lower Thames Crossing, and would be subject to their own planning approval. Thurrock Council are in agreement that this is a matter outside the scope of the LTC DCO.	N/A	Matter under Discussion
Enhancement of key sites in close proximity of LTC	2.1.280	The Council would like the Project to enhance key sites that are in close proximity to the LTC, are of low quality, and are in need of investment <ul style="list-style-type: none"> • King George's Park (Daisy Field) • Koala Park • Anchor Fields • Fielding Avenue • Orsett Heath and Chadwell Recreational Ground and Wickham Fields • Blackshots 	This is not tied to the Project and considered a legacy item. The Council asked the Project for £100,000 to fund the delivery of masterplans for six key sites in the Borough. The funding has been granted by National Highways Designated Funds Programme on the basis of the co-ordinated masterplans which would be produced to demonstrate how the identified future investment(s) would increase levels of physical recreational activity and trips by foot or bike, and the impact this would have on public health, and improvements to biodiversity. The amounts allocated to each site are listed below <ul style="list-style-type: none"> • £25,000 for King George's Park (Daisy Field) • £15,000 for Koala Park • £20,000 for Anchor Fields • £10,000 for Fielding Avenue 	N/A	Matter Agreed*

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
			<ul style="list-style-type: none"> £20,000 for Orsett Heath and Chadwell Recreational Ground and Wickham Fields <p>The last site on this list is Blackshots. The Council are broadly satisfied with the proposals at Blackshots, within the wider Project proposals, and therefore this hasn't been put forward for further investment.</p> <p>Thurrock Council have seen these commitments and marked the matter agreed.</p>		
Restoration of Belhus Wood	2.1.281	The Project should complete the restoration of Belhus Woods including a site survey and Conservation Management Plan	This is not linked to the Project and considered a legacy item. National Highways have funded the management plan for Belhus Park for £50,000 via the Designated Funds Programme. Thurrock Council have seen the Project position set out above and marked the matter agreed.	N/A	Matter Agreed*
Facilitating the restoration of East Tilbury Landfill	2.1.282	The Project should support and facilitate the collaborative partnership of organisations seeking to deliver the restoration of the site at East Tilbury Landfill	National Highways have answered some technical questions around the East Tilbury Landfill for Thurrock Council. However, the Council are yet to confirm their actual ask for this item. Discussions are expected to continue after further clarity on the ask is received.	N/A	Matter under Discussion
Incentivisation of electric and/or low emissions vehicles	2.1.283	The Project should ensure that electric and/or low-emission vehicles are incentivised to use the LTC with discounted or free use.	Any incentivisation of electric vehicles would need to align with the wider DfT proposals for transport decarbonisation. At present the Transport Decarbonisation Plan does not set out a need to incentivise use of electric vehicles on the strategic road network to achieve the government target of net zero. In the event that such incentivisation were to be identified as appropriate and aligned with government strategy, National Highways would work with Thurrock Council to	N/A	Matter Not Agreed

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			support this case being made to the Department for Transport.		
Low-emission vehicle usage targets	2.1.284	The Project should commit to low-emission vehicle usage targets with financial penalties payable to Thurrock in the event of exceedance.	This request was declined by National Highways on 2 March 2021. This request is associated with a wider issue that would need to be taken up with the Department of Transport for consideration. The Project cannot commit to the request as it is outside the scope of the LTC DCO. HATCH-L19 (Item No. 2.1.283) (incentivisation of EV / low emission vehicles) is more likely to be successful and we could support Thurrock making that case.	N/A	Matter Not Agreed
Changes to A13/Orsett Cock Junction Arrangements; Trunking of A13	2.1.285	The Project should commit to trunking of the A13 from Stanford-le-Hope and Manorway Roundabout (including a section of the A1014) to the A13 junction with the A1089. National Highways' trunking / de-trunking proposals as part of the LTC scheme are not yet clear and have not been the subject of effective technical engagement and / or consultation.	National Highways has written to Thurrock Council on the 23rd August 2022 offering to work collaboratively and resume trunking process meetings as soon as possible. The offer contains a pledge to work as quickly as possible so that, subject to further detailed assessment work on the route, a trunking order can be promoted with a view that National Highways can take over operations of the A13 and the A1004 by the end of the current RIS period. This offer has been set out by National Highways separately from the development of the LTC and it is neither contingent on nor associated with the LTC scheme. In addition to working towards trunking the section of the A13 to Manorway and A1014, National Highways would also be willing to explore trunking the whole of the A13 in Thurrock to Five Bells junction in parallel with the section to Manorway. We believe this approach will maximise the benefits to Thurrock Council. As well as transferring the costs and liabilities associated with an additional 7km to	N/A	Matter Under Discussion

Topic	Item No.	Thurrock Council Comment	National Highway's Response	Application Document Reference	Status
			<p>National Highways, it will remove the last remaining section of high-speed road network from Thurrock Council maintenance responsibilities. Trunking will also transfer the responsibility for operation, maintenance and any future upgrading of the A13 and A1014 to National Highways, meaning that Thurrock Council can divert specialist resources onto other A and B roads managed by the Council. It will allow any necessary large-scale enhancements to the A13 corridor to be more easily developed and delivered through the RIS process.</p> <p>Thurrock Council have seen the project position set out above, but are yet to provide feedback.</p>		

Appendix A Documents considered within this Statement of Common Ground

A list of the key documents which have been considered in the development on this SoCG outside of the DCO application documents are provided below.

- a. Consultation materials released by LTC at the following stages of consultation:
 - i. Route Consultation (Opened January 2016, closed March 2016)
 - ii. Statutory Consultation (Opened October 2018, closed December 2018)
 - iii. Supplementary Consultation (Opened January 2020, closed April 2020)
 - iv. Design Refinement Consultation (Opened July 2020, closed August 2020)
 - v. Community Impacts Consultation (Opened July 2021, closed September 2021)
 - vi. Local Refinement Consultation (Opened May 2022, closed June 2022)
- b. Scoping Opinion: Proposed Lower Thames Crossing, 2017
- c. Consultation responses received from Thurrock Council at the following stages of consultation:
 - i. Route Consultation (Opened January 2016, closed March 2016)
 - ii. Statutory Consultation (Opened October 2018, closed December 2018)
 - iii. Supplementary Consultation (Opened January 2020, closed April 2020)
 - iv. Design Refinement Consultation (Opened July 2020, closed August 2020)
 - v. Community Impacts Consultation (Opened July 2021, closed September 2021)
 - vi. Local Refinement Consultation (Opened May 2022, closed June 2022)
- d. LTC Mitigation Benefits Report, October 2020 (Hatch Report)
- e. LTC Response: Thurrock LTC Mitigation Benefits Report and delivering on your asks of the project, March 2021
- f. Thurrock Council and National Highways Position Statements related to the Hatch Report (July 2021, Nov 2021):

- i. Securing Passive Provision via Requirement 3
- ii. Passive Provision – Definitions
- iii. Development of the TLR
- iv. Development of a junction at Ockendon
- g. Thurrock Council's comments on the draft and final DCO application documents (the withdrawn DCO application), mid 2020- mid 2021
- h. Technical notes, position papers and emails related to mitigation and legacy (Hatch) measures, exchanged between Thurrock Council and National Highways, 2020-2022
- i. Thurrock Council's reviews of the draft DCO (April 2021, October 2021, February 2022 and Aug 2022) and LTC Responses to comments on the draft DCO (June 2021, December 2021, April 2022 and Aug 2022)
- j. Thurrock Council's comments on the LTC Cordon Models, 2021-2022
- k. Sustainable Transport Complementary Measures Report, March 2021, developed by the Sustainable Transport Working Group (STWG)
- l. Lower Thames Crossing A13 Junction Design Approach, May 2021
- m. Traffic and transport assessment in DCO 2.0, a memo for stakeholders, April 2022
- n. Remaining Changes since DCO 1, an update for CIPHAG, May 2022
- o. Sharing Environmental Information, presentation to CIPHAG, December 2021
- p. Letter from National Highways to Thurrock Council re A13/A1014 Trunking, August 2022
- q. Thurrock Council and Thames Estuary Growth Board (TEGB) Climate Change Action Plan, February 2022
- r. Current legislation and government guidance in relation to compensation
- s. https://nationalhighways.co.uk/publications/?__RequestVerificationToken=__DtnguETa0yYmAKZLpFkltbLMeQcjvzxHfErLlu5CQOH7hU51mCldFRaAtnOWgxfjuGcUi9oyrySUjOGJnUOBVXqxhT5JKlzmPOq2zRW2VQ1&sort=&query=&subject=Land%252c%2Bproperty%2Band%2Bcompensation
- t. Meeting notes of all relevant meetings (2017-2022)

Appendix B Glossary

Term	Abbreviation	Explanation
A122 Lower Thames Crossing	Project	A proposed new crossing of the Thames Estuary linking the county of Kent with the county of Essex, at or east of the existing Dartford Crossing.
Affected Road Network	ARN	In air quality assessment, the network of roads to be considered within the air quality model (selection of the roads within the model depends on a number of criteria such as changes in Heavy Duty Vehicle flows).
Air Quality	AQ	A measure of the level of various atmospheric pollutants.
Air Quality Expert Group	AQEG	The Air Quality Expert Group (AQEG) is an Expert Committee to Defra that provides independent scientific advice on air quality, in particular the air pollutants contained in the 2019 Clean Air Strategy, the Air Quality Strategy (AQS) for England, Scotland, Wales and Northern Ireland and those covered by the EU Directives on Ambient Air Quality. Specifically, AQEG gives advice on concentrations, emission sources and characteristics of air pollutants in the UK.
Air quality objectives	AQO	There are a wide range of terms and concepts in national and international initiatives, for example, standards, objectives, target values and limit values. The two which feature within the UK's air quality strategy are standards and objectives. The Air Quality Standards Regulations 2010 contain Limit Values and Target Values. The national Air Quality Objectives and Air Quality Standards Regulations limit and target values with which the UK must comply are summarised in the National air quality objectives of the Air Quality Strategy.
Air Quality Strategy 2019	AQS	A strategy defined by the Government for improving air quality in the UK in the medium term.
All-purpose trunk road	APTR	A road available for all types of traffic to use, unless restricted by a Traffic Order. In contrast, a motorway is restricted to use only by certain types of traffic in accordance with DMRB standards.
Association of South Essex Local Authorities	ASELA	A partnership of six neighbouring councils that have come together to promote growth and prosperity in the region. The partners are Basildon Borough Council, Brentwood Borough Council, Castle Point Borough Council, Rochford District Council, Southend-on-Sea Borough Council and Thurrock Council
Biodiversity Net Gain	BNG	Ecological enhancements introduced by the Project which leave the natural environment and the number of species present in it, in a measurably better state than before construction.

Term	Abbreviation	Explanation
Carbon and Energy Plan	CEP	A DCO document that demonstrates National Highways carbon ambitions for the project and how they will be achieved. This is a secured document, meaning that the carbon-reduction commitments contained within it will be legally binding.
Carbon dioxide	CO ₂	Carbon dioxide is a colourless gas, naturally occurring in the Earth's atmosphere. Carbon dioxide is a significant long-lived greenhouse gas. Anthropogenic emissions of carbon dioxide since the Industrial Revolution have rapidly increased its concentration in the atmosphere.
Chronic Obstructive Pulmonary Disease	COPD	An obstructive lung disease characterised by chronically poor airflow that typically worsens over time.
Civil Engineering Environmental Quality Assessment and Award Scheme	CEEQUAL	An evidence-based sustainability assessment, rating and awards scheme for infrastructure and celebrates the achievement of high environmental and social performance.
Clinical Commissioning Group	CCG	Clinically led statutory NHS bodies responsible for the planning and commissioning of health care services for their local area. CCGs were created following the Health and Social Care Act in 2012 and replaced Primary Care Trusts on 1 April 2013.
Code of Construction Practice	CoCP	Control measures and standards to be implemented by the Project, including those to avoid or reduce environmental effects.
Combined Modelling and Appraisal Report	ComMA	The purpose of the Combined Modelling and Appraisal Report is to inform decision makers and stakeholders on how the evidence underpinning the business case has been developed, from the initial identification of the underlying problem through the collection of data and the production of any supporting traffic models and forecast impacts of the Project on traffic to the eventual economic appraisal.
Community Impact Consultation	CIC	This consultation explained the impacts of the project and how we plan to reduce them, as well as the changes we have made to the project since the design refinement consultation. These have been informed by feedback received from our stakeholders and ongoing design work.
Community Impacts and Public Health Advisory Group	CIPHAG	An advisory group established by National Highways to understand local knowledge and understanding to feed into the relevant technical assessments.
Connected and Autonomous Vehicles	CAV	Connected and autonomous vehicles combine connectivity and automated technologies to assist or replace humans in the task of driving. This can be through a combination of advanced sensor technology, on-board and remote processing capabilities, and telecommunications systems.

Term	Abbreviation	Explanation
Construction Environmental Management Plan	CEMP	The primary environmental management document that defines the procedures for achieving the objectives set out in the environmental policy. It incorporates environmental performance targets set for the Project.
Construction Industry Research Information Association	CIRIA	A not-for-profit, independent organisation that facilitates a range of collaborative activities to help improve the construction industry.
Construction Logistics and Community Safety Standard	CLOCS	The CLOCS Standard is the direct result of collaboration between the construction and fleet sectors to address shared issues. It draws together evolving and applied best practice from a number of standards, policies and codes of practice to provide one industry standard that can be implemented by regulators, clients, principal contractors and fleet operators.
Council Led Support	CLS	Term used in the Thurrock Council 'LTC Mitigation Benefits' Report also referred to as the 'Hatch Report dated October 2020 which identified mitigation and legacy measures. Council-led Support: measures that ensure sufficient local resource is available to support local businesses and communities throughout the construction phase and into the transition of the operating scheme.
Demand Responsive Transport	DRT	A flexible service that provides shared transport to users who specify their desired location and time of pick-up and drop-off.
Department for Environment, Food and Rural Affairs	Defra	The UK Government department responsible for environmental protection, food production and standards, agriculture, fisheries and rural communities in the United Kingdom of Great Britain and Northern Ireland.
Department for Levelling Up, Housing and Communities	DLUHC	The UK Government department for housing, communities, local government in England and the levelling up policy. Formerly called the Ministry of Housing, Communities and Local Government.
Department for Transport	DfT	The UK Government department responsible for the English transport network and a limited number of transport matters in Scotland, Wales and Northern Ireland that have not been devolved.
Design Manual for Roads and Bridges	DMRB	A comprehensive manual which contains requirements, advice and other published documents relating to works on motorway and all-purpose trunk roads for which one of the Overseeing Organisations (National Highways, Transport Scotland, the Welsh Government or the Department for Regional Development (Northern Ireland)) is the highway authority. For the A122 Lower Thames Crossing, the Overseeing Organisation is National Highways.

Term	Abbreviation	Explanation
Design Principle	DP	Design principles are the fundamental ideas and elements that could be applied to achieve successful design. The elements that together comprise a design.
Detailed Local Operating Agreement	DLOA	The Detailed Local Operating Agreement will set out the agreed operational and communication protocols for the LTC Project throughout the construction period and will enable handover into Operational Maintenance.
Development Consent Order	DCO	A DCO is a means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects (NSIP) under the Planning Act 2008.
Development Consent Order application	DCO application	The Project Application Documents, collectively known as the 'DCO application'.
Distributional Impact Appraisal	DIA	Distributional Impact Appraisal
Draft Development Consent Order	dDCO	dDCO is the draft document obtaining permission for developments categorised as Nationally Significant Infrastructure Projects.
Electric vehicle	EV	Electric vehicles are vehicles that are either partially or fully powered on electric power.
Environmental Health Officers	EHO	Environmental health officers are responsible for mentoring and enforcing health and hygiene legislation. They also investigate when there's an incident, such as pollution, a noise problem, toxic communication, pest infestation or an outbreak of food poisoning.
Environmental Impact Assessment Report	EIA	A report prepared for a consenting authority who, when deciding whether to grant consent for a project which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision-making process.
Environmental Impact Assessment	EIA	A process by which information about environmental effects of a proposed development is collected, assessed and used to inform decision making. For certain projects, EIA is a statutory requirement, reported an Environmental Statement.
Environmental Management Plan	EMP	A plan setting out the conclusions and actions needed to manage environmental effects as defined by the Design Manual for Roads and Bridges standard LA 120. The CoCP is the equivalent of the first iteration of the EMP (EMP1). The contractor's EMP would be EMP2 and the end of construction EMP would be EMP3.
Environmental Statement	ES	A document produced to support an application for development consent that is subject to Environmental Impact Assessment (EIA), which sets out the likely impacts on the environment arising from the proposed development.
Engagement with the	ESSPSG	An advisory capacity only, to enhance local knowledge and understanding. All decisions relating to opportunities to

Term	Abbreviation	Explanation
Emergency Services and their Safety Partners		reduce impacts or identification of benefits as a result of the Project are reserved for Highways England.
Equalities Impact Assessment	EQIA	a process designed to ensure that a policy, project or scheme does not unlawfully discriminate against any protected characteristic.
Essex Partnership University NHS Foundation Trust	EPUT	an NHS foundation trust which provides community health, mental health and learning disability services to approximately 1.3 million people throughout Bedfordshire, Essex, Suffolk and Luton.
Examining Authority	ExA	The Examining Authority is the Inspector, or the Panel of Inspectors appointed to conduct the Examination of the application
Excavated Materials Assessment	EMA	Excavated Materials Assessment provides a mechanism to determine and validate which third-party potential receiver sites would be capable of accepting excavated materials from the Project.
Fine particulate matter	PM	Particulate matter containing microscopic solids or liquid droplets that are so small that they can be inhaled and cause serious health problems.
Fleet Operator Recognition System	FORS	The Fleet Operator Recognition Scheme (FORS) is a voluntary accreditation scheme for fleet operators. FORS aims to drive up standards within fleet operations and demonstrate which operators are achieving exemplary levels of best practice in safety, efficiency and environmental protection.
Flood Risk Assessment	FRA	An assessment of the risk of flooding from all flooding mechanisms, the identification of flood mitigation measures, and identification of actions to be taken before and during a flood.
Footpath	FP	A footpath is a type of thoroughfare that is intended for use only by pedestrians and not other forms of traffic such as motorized vehicles, bicycles and horses. They can be found in a wide variety of places, from the centre of cities, to farmland, to mountain ridges.
Functionally Linked Land	FLL	‘Functionally linked land’ (FLL) is a term often used to describe areas of land or sea occurring outside a designated site which is considered to be critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a Special Areas of Conservation (SAC)/ Special Protection Area (SPA)/ Ramsar site has been designated.
GD 300	GD 300	Requirements for new and upgraded all-purpose trunk roads (expressways).

Term	Abbreviation	Explanation
Geographic Information System	GIS	A geographic information system (GIS) is a computer system for capturing, storing, checking, and displaying data related to positions on Earth's surface. GIS can show many kinds of data on one map, such as streets, buildings, and vegetation.
Green Belt Assessment	GBA	A Green Belt Assessment is a process which considers the impact of a proposed development on the Green Belt designation, takes account of the Policy Tests set out in National Policy and reaches a policy-based conclusion.
Greenhouse gas	GHG	Gases able to absorb infrared radiation emitted from Earth's surface and reradiate it back to Earth's surface, thus contributing to the greenhouse effect. Carbon dioxide, methane, and water vapour are the most important greenhouse gases.
Habitats Regulations Assessment	HRA	A tool developed by the European Commission to help competent authorities (as defined in the Habitats Regulations) to carry out assessment to ensure that a project, plan or policy will not have an adverse effect on the integrity of any Natura 2000 or European sites (Special Areas of Conservation, Special Protection Areas and Ramsar sites), either in isolation or in combination with other plans and projects, and to begin to identify appropriate mitigation strategies where such effects were identified.
Health and Equalities Impact Assessment	HEqIA	A systematic process used to identify the potential health and equalities impacts arising from policies, plans, programmes and projects, to identify the distribution of those effects amongst the population and to identify mitigation measures to address these effects, thereby minimising adverse effects on the local population
Health Impact Assessment	HIA	An assessment of potential impacts on human health. Not a legal requirement but good practice and will almost certainly be done for the Project.
Heavy Duty Vehicle	HDV	Freight vehicles of more than 3.5 tonnes (e.g. lorries) or passenger transport vehicles of more than 8 seats (e.g. buses).
Heavy Goods Vehicle	HGV	A large, heavy motor vehicle used for transporting cargo.
Highways England Water Risk Assessment Tool	HEWRAT	Highways England Water Risk Assessment Tool – a spreadsheet which automates the calculation of the risk of discharges of routine highway runoff to surface watercourses causing sedimentation as well as failures of environmental quality standards for dissolved metals. The tool also allows calculation of the risk of an accidental spillage causing a serious pollution incident.
Institute of Air Quality Management	IAQM	A professional body for air quality professionals.

Term	Abbreviation	Explanation
Joint Operations Forum	JOF	The JOF is an executive level forum made up of National Highways and its Contractors. National Highways will establish and chair a JOF, attended by senior representatives from the Contractors.
Joint Strategic Needs Assessment	JSNA	Joint Strategic Needs Assessment (JSNA) looks at the health needs of local people to help Thurrock council: commission health, well-being and social care services in the borough; and improve the physical and mental health and well-being of individuals and communities. It supports commissioning processes used by health, council and community organisations in Thurrock.
Key Performance Indicator	KPI	Measurable value that demonstrates how effectively a company is achieving key business objectives.
Landscape and Ecology Management Plan	LEMP	A document which provides details on the delivery and management of the landscape and ecology elements identified in the Environmental Masterplan for the Project, including their success criteria.
Lead Local Flood Authority	LLFA	LLFAs are county councils and unitary authorities. They lead in managing local flood risks (i.e. risks of flooding from surface water, ground water and ordinary (smaller) watercourses). This includes ensuring co-operation between the Risk Management Authorities in their area. The LLFA for the M25 area is Essex County Council who is acting on behalf of Thurrock.
Light-emitting diode	LED	A semiconductor device that emits visible light when an electric current pass through it.
Limits of deviation	LoD	The tolerances, both laterally and vertically, that any parts of the Project can be constructed from the lines and situations shown on the Works Plans (Application Document 2.6) and the levels shown on the Engineering Section Drawings (Application Document 2.9).
Local Air Quality Management	LAQM	A process that requires local authorities across the UK to review, assess and manage the air quality within their geographical areas.
Local Authority	LA	A local authority is an organisation that is officially responsible for all the public services and facilities in a particular area.
Local Highway Authority	LHA	A local highway authority is an organisation that is responsible for the maintenance of public roads. The current role of a highway authority is defined in the Highways Act 1980 and the role is held by a large number of different groups.
Local Planning Authority	LPA	A local planning authority is the local authority or council that is empowered by law to exercise statutory town planning functions for a particular area of the UK. May also be referred to as 'local authority'.

Term	Abbreviation	Explanation
Local Refinement Consultation	LRC	The local refinement consultation was held to share a number of updates made to the project based on feedback from a consultation in 2021, ongoing stakeholder engagement and technical surveys.
Local Road Network	LRN	The Local Road Network is that portion of the Road Network for which a Local Government is responsible and is eligible for funding from the State Government to operate and maintain.
Lower Thames Area Model	LTAM	Transport model designed to forecast impacts of providing additional road-based capacity across the River Thames at locations at or east of the existing Dartford Crossing.
M2 Motorway	M2	Orbital motorway that encircles most of Greater London.
M25 Motorway	M25	Orbital motorway that encircles most of Greater London.
Main Works Contractor	MWC	A term used to identify the contractor who will be awarded a main contract for the delivery of a section of the LTC programme. They will be responsible for delivering all main works and will work with the Client to discharge our obligations under the DCO.
Major Road Network	MRN	The Major Road Network (MRN) is a classification of local authority roads in England. It incorporates the National Highways-controlled Strategic Road Network (SRN) and the more major local authority-controlled A roads.
Management of Research Projects in the Historic Environment	MoRPHE	The Management of Research Projects in the Historic Environment (MoRPHE) is a series of project-management guides designed to support the planning and implementation of both basic research and applied research and development projects in the historic-environment sector produced by Historic England. They provide the highest levels of best practice for archaeological work in England.
Medium-sized enterprises	SME	An SME is any organisation that has fewer than 250 employees and a turnover of less than €50 million or a balance sheet total less than €43 million. A breakdown of the different organisation sizes is in the below table.
National Health Service	NHS	The name of the public health services of England, Scotland and Wales, also commonly used in Northern Ireland.
National Health Service Thurrock Clinical Commissioning Group	Thurrock CCG	Thurrock Clinical Commissioning Group (CCG) is responsible for the commissioning and delivery of local health care services. The CCG buys healthcare from hospitals, community and mental health services and some specialist services (service contracts with GPs, dentists, pharmacists and opticians are managed by NHS England).
National Highways	NH	A UK government-owned company with responsibility for managing the motorways and major roads in England. Formerly known as Highways England.

Term	Abbreviation	Explanation
National Networks	NN	The national networks comprise the strategic road network (the network for which the Secretary of State for Transport is highway authority), the rail network and strategic rail freight interchanges (SRFIs). The strategic road network covers motorways and major A roads in England.
National Planning Policy Framework	NPPF	The National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied.
National Policy Statement	NPS	There are 12 designated National Policy Statements (NPSs), setting out government policy on different types of national infrastructure development, including energy, transport, water and waste. NPSs provide the framework within which Examining Authorities make their recommendations to the Secretary of State.
National Policy Statement for Electricity Networks Infrastructure (EN-5)	NPS EN-5	NPS EN-5 sets out the needs for the Government's policy for delivery of major energy infrastructure and provides the primary basis for decisions taken by the Infrastructure Planning Commission (IPC) on applications it receives for electricity networks infrastructure.
National Policy Statement for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)	NPS EN-4	Formed in January 2018, the MHCLG took over the duties of the former Department for Communities and Local Government. In September 2021, it was renamed the Department for Levelling Up, Housing and Communities.
National Policy Statement for National Networks	NPSNN	The NPSNN sets out the need for, and Government's policies to deliver, development of Nationally Significant Infrastructure Projects on the national road and rail networks in England. It provides planning guidance for promoters of Nationally Significant Infrastructure Projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.
Nationally Significant Infrastructure Project	NSIP	Major infrastructure developments in England and Wales, such as proposals for power plants, large renewable energy projects, new airports and airport extensions, major road projects, etc. that require a development consent under the Planning Act 2008.
Natural England	NE	An executive non-departmental public body, sponsored by the Department for Environment, Food & Rural Affairs, which is the government's adviser for the natural environment in England, helping to protect England's nature and landscapes for people to enjoy and for the services they provide.
New Engineering Contract	NEC	A system of contracts created by the Institution of Civil Engineers and used as the form of contract to engage both designers and contractors.

Term	Abbreviation	Explanation
New Roads and Street Works Act 1991 (c.22)	NRSWA	Legislation for the Co-ordination of Street Works and Works for Road. Purposes and Related Matters.
Nitrogen Deposition	NDEP	The rate at which nitrogen accumulates on a surface as a result of separation from the atmosphere. The principal unit of measurement of nitrogen deposition is kilograms of nitrogen per hectare per year (kgN/ha/yr).
Nitrogen dioxide	NO ₂	A reactive gas introduced into the environment by natural causes, including entry from the stratosphere, bacterial respiration, volcanos, and lightning. It is also introduced by the emissions of internal combustion engines burning fossil fuels.
Non-motorised user(s)	NMU	Users of non-motorised vehicles (eg cyclists, horse riders) and pedestrians
Non-Road Mobile Machinery	NRMM	Any mobile machine, item of transportable industrial equipment, or vehicle – with or without bodywork – that is not intended for carrying passengers or goods on the road and is installed with an internal combustion engine.
North East London NHS Foundation Trust	NELFT	NELFT provides an extensive range of integrated community and mental health services for people living in the London boroughs of Barking & Dagenham, Havering, Redbridge and Waltham Forest and community health services for people living in the south west Essex areas of Basildon, Brentwood and Thurrock.
Outline Landscape and Ecology Management Plan	oLEMP	A document which outlines the proposed management of the landscape and ecological elements of the A122 Lower Thames Crossing.
Outline Materials Handling Plan	oMHP	A document which sets out the approach and high-level principles for handling construction materials and waste on the Lower Thames Crossing Project, both inside and outside the Order Limits.
Outline Site Waste Management Plan	oSWMP	The Outline Site Waste Management Plan (oSWMP) sets out the overarching principles and procedures that would be applied for the management of waste during the construction phase of the Project.
Outline Traffic Management Plan for Construction	oTMPfC	The outline Traffic Management Plan for Construction (oTMPfC) has been produced to provide an outline framework and principles that will be applied for the design and management of construction traffic management and transport logistics for the Lower Thames Crossing Project.
Overarching National Policy Statement for Energy (EN-1)	NPS EN-1	A document which sets out the need for the Government's policy for delivery of major energy infrastructure. This Overarching National Policy Statement for Energy (EN-1) is part of a suite NPSs initially issued by the Secretary of State for Energy and Climate Change (now the Department for Business, Energy and Industrial Strategy). There are a

Term	Abbreviation	Explanation
		further five technologies specific NPSs for the energy sector.
Preliminary Environmental Information Report	PEIR	The PEIR presents preliminary environmental information compiled by the applicant for consultation bodies to use to develop an informed view of the likely significant environmental effects of a development (and of any associated development).
Preferred Route Announcement	PRA	The announcement by the SoS for Transport on the route selected from the options stage of the scheme.
Procurement Policy Note	PPN	This note sets out how to take account of social value in the award of central government contracts by using the Social Value Model.
Public Right of Way	PRoW	A right possessed by the public to pass along routes over land at all times. Although the land may be owned by a private individual, the public may still gain access across that land along a specific route. The mode of transport allowed differs according to the type of Public Right of Way, which can consist of footpaths, bridleways and open and restricted byways.
Register of Environmental Actions and Commitments	REAC	A document which identifies the environmental commitments that would be implemented during the construction and operational phases of the Project if the Development Consent Order is granted, and forms part of the Code of Construction Practice (Application Document 6.3, ES Appendix 2.2).
Rendezvous Point	RVP	A location to which responding services personnel attending an incident can be held prior to deployment to the scene.
Road Investment Strategy	RIS	The UK Government's long-term strategy to improve England's motorways and major A roads. The first RIS (known as RIS 1) was published in 2015 and covers the period 2015-2020. A second RIS (RIS 2) was published in 2020 and covers the post-2020 period.
Road Investment Strategy 2	RIS2	The Department for Transport's 5-year strategy for investment in and management of the strategic road network from April 2020 to March 2025.
Royal Institute of British Architects	RIBA	A professional body for architects primarily in the United Kingdom, but also internationally, founded for the advancement of architecture under its royal charter granted in 1837, three supplemental charters and a new charter granted in 1971.
Statement of Reasons	SoR	The Statement of Reasons is a DCO Application Document which sets out the Applicant's reasons for seeking to acquire land.
Secretary of State	SoS	The Secretary of State has overall responsibility for the policies of the Department for Transport.

Term	Abbreviation	Explanation
Site Specific Travel Plans	SSTPs	Site Specific Travel Plans will be developed by contractors in respect of the sites which they are responsible (either an individual construction area or compound, or a number of construction areas and compounds where these are closely located with similar levels of accessibility), following the latest policy advice and best practice documents.
Site Waste Management Plan	SWMP	A document which sets out how resources will be managed, and waste controlled during the Project. Plans usually involve recording the amount of waste that will be produced and details the proposed methods of waste disposal.
Skills, Education and Employment (SEE) Strategy	SEE Strategy	The Skills, Education and Employment Strategy introduces how National Highways aim to provide long-term benefits to communities close to the Project through new jobs and work, higher skills and education. It also begins explains how National Highways will set the standard for construction in a low carbon world. This document will be revised every two years throughout the delivery of the project to remain current and responsive to local and national needs.
Small and Medium Sized Enterprise	SME	A small or medium-sized enterprise with fewer than 250 employees. The EU also defines an SME as a business with fewer than 250 employees, a turnover of less than €50 million, or a balance sheet total of less than €43 million.
Social Value Framework	SVF	The LTC Social Value framework is reflective of local needs and priorities and sets out the wider opportunities that are realised through the way we design and build the crossing. It also aligns with the Government's Social Value Model, published December 2020.
Statement of Common Ground	SoCG	A written statement containing information about the proposal which is the subject of the appeal that the appellant reasonably considers will not be disputed by the local planning authority.
Strategic Outline Business Case	SOBC	First stage of drawing together evidence pertaining to a transport scheme, focusing on the strategy or reasons why change may be required.
Strategic road network	SRN	The core road network in England managed by National Highways.
Supplementary Planning Guidance	SPG	Documents which provide supplementary information in respect of the policies in current or emerging Local Plans or national policy.
Sustainable Drainage System	SuDS	A drainage system designed to reduce the potential impact of new and existing developments with respect to surface water drainage discharges.
Sustainable Transport Working Group	STWG	To develop and deliver improvements to integrated sustainable transport infrastructure, including maximising use of the River Thames and improving connectivity and accessibility for walkers, cyclists and horse-riders.

Term	Abbreviation	Explanation
Targets in the Framework Construction Travel Plan	FCTP	A document which sets out a framework to reduce the impact of the project's construction workforce on the road network as a result of travel to and from construction areas and compounds (including utility logistic hubs). The FCTP sets out proposed ways in which this would be done, including by reducing single occupancy vehicle trips and encouraging sustainable and active travel.
Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014	TTT	The Thames Tideway Tunnel Project as authorised under the 2014 Order.
The National Planning Framework	NPF	The National Planning Policy Framework sets out the government's planning policies for England and how these are expected to be applied.
The Third Road Investment Strategy	RIS3	RIS3 sets out the government's aims and proposals for <i>investment</i> in the <i>strategic road</i> network from 2025 to 2030
Thurrock Community and Voluntary Services	Thurrock CVS	Thurrock CVS (Community and Voluntary Services) supports local organisations and community groups in Thurrock by working behind the scenes to ensure the long-term future of essential services delivered by the voluntary sector.
Thurrock Council	TC	Thurrock Council is the local authority for the borough of Thurrock in Essex, England. Since 1997, Thurrock has been a unitary authority, combining the functions of a non-metropolitan county with that of a non-metropolitan district. The other such authority in Essex is Southend-on-Sea.
Tilbury Link Road	TLR	An option considered, following PRA in developing the preliminary design for Statutory Consultation.
Tonnes of carbon dioxide equivalent	tCO ₂ e	A metric relating to emissions of carbon dioxide and the resultant climate change impact adopted by the UN.
Traffic Management Forum	TMF	The TMF would review planned traffic management arrangements and receive comments as to their appropriateness. The TMF would also monitor, review, and provide updates to the TMPs when required.
Traffic Management Plan	TMPs	The approach to carrying out temporary traffic management for the safe construction of the Project. It will also explain management measures available to our Contractor to reduce the impact on the local community (including journey time reliability, access, and safety).
Transport Analysis Guidance	TAG	National guidance document produced by the Department for Transport.

Term	Abbreviation	Explanation
Transport Assessment	TA	A document that sets out assessments of the transport implications of development, and Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential impact of the development (ie. in the case of developments with anticipated limited transport impacts).
Tunnel boring machine	TBM	Machine used to excavate tunnels with a circular cross-section.
UK Power Network	UKPN	An energy network operator. Owns and maintains the electricity cables in Southeast England, the East of England and London.
United Kingdom Accreditation Service	UKAS	The United Kingdom Accreditation Service is the sole national accreditation body recognised by the British government to assess the competence of organisations that provide certification, testing, inspection and calibration services.
Utilities Logistics Hub	ULH	The ULH receives, stores and distributes the plant machinery and materials for specific utility works.
Walkers, cyclists and horse riders	WCH	Walkers, cyclists and horse riders.
Web-based Transport Appraisal Guidance	WebTAG	Former name given for the Department for Transport's web-based multi-modal guidance on appraising transport projects and proposals, now known as Transport Analysis Guidance (TAG).
Wider Network Impacts Management and Monitoring Plan	WNIMMP	A document which sets out a traffic impact monitoring scheme to be carried out a year prior to opening (to establish a baseline) and one and five years after the road opens.
Worker Accommodation Report	WAR	The Worker Accommodation Report (Application Document 7.21) sets out the estimated number of workers at the peak construction phase of the Project who would require temporary accommodation, what type of accommodation these workers are anticipated to seek and where, and a consideration of this demand in the context of supply and the operation of the accommodation market
World Health Organization	WHO	The WHO is a specialised agency of the United Nations that is concerned with international public health.
Written Scheme of Investigation	WSI	A document which sets out the scope, guiding principles and methods for the planning and implementation of archaeological assessment.
Local Operating Agreement	LOA	Any agreement governing the formation and operation of any Local Operating Entity formed pursuant to Section 3.3 of this Agreement.

Term	Abbreviation	Explanation
Compulsory Purchasing Order	CPO	A compulsory purchase order (CPO) is a legal process that allows acquiring authorities (including public and private bodies) to require those with interest in property, e.g. owners and occupiers, to sell their interests if they obstruct any development or infrastructure project that benefits the 'greater public good'.

Appendix C List of engagement activities

- C.1.1 A summary of the meetings and correspondence undertaken between the two parties in relation to the Project is outlined in Table C.1 below.
- C.1.2 It is agreed that this is an accurate record of the key meetings and correspondence undertaken between (1) National Highways and (2) Thurrock Council in relation to the matters addressed in this SoCG.
- C.1.3 Our engagement with Thurrock Council has been undertaken via various forms and these comprise of regular technical engagement meetings including fortnightly procedural meetings, fortnightly Hatch meetings, wider network impacts meetings, strategic discussions, traffic modelling fortnightly catch-up, monthly CIPHAG meetings, senior forum, climate and decarbonisation meetings and additional technical meetings.
- C.1.4 In addition to the meetings / correspondence listed in the tables, there has also been regular correspondence by email / phone call. This is not reported in the table, but the total number of contact entries in our stakeholder database is 2649 emails and 31 phone calls.
- C.1.5 In addition to the meetings detailed in Table 2.1, information has been shared with stakeholders to assist with their understanding of the Project and its effects. The key pieces of technical information shared with Thurrock Council is outlined in Table C.2.

Table C.1 Engagement activities between National Highways and Thurrock Council

October 2020 – August 2022		
Procedural Meetings		
01.10.20 – 27.10.22	Meeting 34 occurrences	Fortnightly catch-up meetings to provide updates and discuss ongoing work and tasks. This meeting has also been used to discuss Thurrock's fundamental Group 3 Issues.
Topic Specific Regular Technical Meetings		
09.02.21 – 28.10.22	Meeting 43 occurrences	Fortnightly Hatch Report meetings to discuss ongoing progress on 58 items raised within the Council's Hatch Report.
26.01.21 – 18.10.22	Meeting 18 occurrences	Monthly Wider Network Impacts Meetings with Thurrock Council to discuss outstanding wider network matters.
13.01.22 – 27.10.22	Meeting 21 occurrences	Fortnightly Traffic Modelling Catch-up to discuss technical traffic modelling matters, assumptions and outputs

10.06.21 – 16.06.22	Meeting 8 occurrences	Climate and Decarbonisation Meeting to discuss National Highway’s approach to climate and carbon. This meeting has also been used to discuss the Climate Change Action Plan prepared by Thurrock Council and associated commitments.
12.05.22 – 13.09.22	Meeting 10 occurrences	Fortnightly Construction Traffic Impacts meeting to discuss the impacts of the LTC construction phase on Thurrock Council’s roads. <ul style="list-style-type: none"> This meeting has also been used to discuss area wide and localised mitigation measures.
02.02.22 – 03.08.22	Meeting 4 occurrences	S106 Meetings to discuss the Heads of Terms proposed for inclusion. <ul style="list-style-type: none"> This meeting has also been used to discuss commitments from the SEE Strategy and the Community Fund.
12.10.20- 26.08.22	Meeting 18 occurrences	Land Use and Traveller site meetings to discuss <ul style="list-style-type: none"> Project Design Land use and plot information Effects of project on property Project proposals and compensation Relocation of Gammon Field Travellers site, site design options and feedback from Essex Police Orsett Heath Academy and Memorandum of Agreement
Strategic Discussions		
19.10.21 – 18.10.22	Meeting 17 occurrences	Strategic Discussions to discuss key issues between senior members of Thurrock Council and National Highways including transport modelling, legacy and Hatch measures.
06.07.21 – 14.09.22	Meeting 16 occurrences	Senior Forum meetings used to discuss key issues between senior members of Thurrock Council and National Highways including the Executive Director, Matt Palmer. The Senior Forum Meeting is designed to remove blockages from the technical engagement process and expediate decision-making on key issues.
12.07.22 and 07.10.22	Meeting 2 occurrences	Strategic Meetings with LTC Project Director and Thurrock Officers to discuss key issues including matters both within and outside the scope of the LTC DCO. This meeting was also used to map out next steps including a site visit.
Additional Technical Meetings/Workshops		
18.03.21 - 24.05.21	Workshop 6 occurrences	Workshop discussing comments on:

		<ul style="list-style-type: none"> • Transport Assessment Chapter 8 (from the DCO submission in Oct 2020) • Draft Outline Traffic Management Plan for Construction
24.03.21	Meeting	Meeting to discuss the London Resort proposals , potential impact on LTC and way forward
06.05.21	Workshop	Workshop discussing comments on: <ul style="list-style-type: none"> • Draft Outline Site Waste Management Plan • Draft Outline Landscape and Ecology Management Plan
20.05.21 and 03.12.21	Meeting 2 occurrences	Design and evolution of Tilbury Fields covering the evolution of the tilbury Fields proposal, stakeholder concerns and next steps
08.06.21 - 20.10.21	Meeting 15 occurrences	Topic specific meetings covering comments made on ES chapters by the Council and resolving older issues to develop the SOCG. Covering the following topics: <ul style="list-style-type: none"> • Air quality • Biodiversity • Cultural heritage • Noise • HEQIA • Highway design • Drainage • Climate • Cumulative assessment • Geology • Waste • Landscape
16.07.21	Workshop	Workshop on Manorway, Orsett Cock and Asda roundabouts. Discussion on traffic modelling issues affecting these locations.
23.07.21 - 28.07.21	Meeting 3 occurrences	Issue Resolution consolidation exercise to combine and assimilate the outstanding issues in the issue logs
09.08.21 and 23.11.21	Meeting 2 occurrences	Impact of construction works on Thurrock PRowS covering closures and diversions of all the PRowS in Thurrock potentially affected by construction works and mitigating impacts on the PRow users
04.10.21 and 25.05.22	Meeting 2 occurrences	Meeting with Whitecroft Care Home to discuss Mitigation of impacts of LTC on the Care Home
03.02.22	Meeting	Issue Resolution discussion covering Issues categorised as Group 1 and Group 3 issues

22.02.22	Meeting	Outstanding Issues in the draft Development Consent Order (DCO) meeting to discuss all outstanding matters in the dDCO (Group 3 and Group 2 matters) and next steps
10.03.22	Meeting	Nitrogen Deposition Methodology Briefing covering methodology for understanding nitrogen deposition impacts and the Project's approach for mitigation and compensation.
05.05.22	Meeting	Issue Resolution discussion covering issues categorised as Group 2 issues
31.05.22	Meeting	Briefing Session covering the Tilbury Link Road & A13 modelling exercise undertaken by National Highways
28.09.22	Briefing	EIA Topic Specific Briefings on: <ul style="list-style-type: none"> • Terrestrial Biodiversity • Marine Biodiversity • Geology and Soils • Material Assets and Waste • Road Drainage and Water Environment • Cultural Heritage • Landscape and Visual • Climate and Cumulative Effects Assessment • Carbon
10.08.22 - 10.10.22	Workshops 4 occurrences	SoCG Writing Session to discuss development of SoCG, rewriting the issues and fine tuning
13.10.22	Meeting	Draft DCO Review to discuss Thurrock Council comments on the draft DCO
18.10.22	Meeting	Meeting on operational incident management to discuss operational incident management in Thurrock: <ul style="list-style-type: none"> • The frequency and scale of incidents at Dartford • Operational management framework
Cross Local Authority Meetings/Workshops		
27.04.22	Meeting	Joint meeting between Thurrock Council and Essex Council on traffic modelling output specifications, next steps, key work elements, and clarification of the areas of shared and individual involvement for the two authorities.
31.03.21 – 18.08.22	Meeting 12 occurrences	Community Impact and Public Health Advisory Group discussing issues such as: <ul style="list-style-type: none"> • Comments on previous version of HEQIA • Independent Review of the HEQIA

		<ul style="list-style-type: none"> • Approach to engagement with hard to reach groups. • Feedback from Community Impacts Consultation • Update on community impacts report • Sharing of environmental information, noise and air quality impacts and mitigation (inc exceedance framework) • Sharing of information relating to construction phasing, initial findings of journey time impacts • Approach to assessment of severance • Discussion of sensitive receptors such as Whitecroft Care Home • Community Fund and links with health and wellbeing • Construction workforce impacts on accommodation and healthcare • Medical and operational healthcare commitments
03.11.21	Meeting	Securing Mechanisms Workshop to discuss the role of the local authorities within the discharge of the Schedule 2 Requirements, provide a definition of mitigation, compensation and benefits, and clarify the securing mechanisms that the Project can use to secure such mitigation, compensation and benefits.
02.08.2022	Meeting	Local Authority Carbon Update to provide a brief overview of the legislative and policy background which included reference to UK legislation, planning policies, and National Highways policies, the transport decarbonisation plan and the IEMA guidance. It then covered the carbon matters in the DCO and signposted the attendees to where information relating to greenhouse gas emissions would be presented within the DCO documents. Both construction and operational carbon emissions were discussed. An overview of all carbon commitments contained within the DCO was presented which included commitments by both the National Highways and the contractor.
25.01.22	Workshop	Design of Tilbury Fields Meeting to discuss the proposed Tilbury Fields re-design with all relevant stakeholders such as Thurrock Council, Natural England, Historic England and Environment Agency.
03.10.22 and 13.10.22	Briefing 2 occurrences	EIA Topic Specific Environmental Briefings with other CIPHAG attendees on <ul style="list-style-type: none"> • Air Quality

		<ul style="list-style-type: none"> • Noise and vibration • Health impacts • Climate and carbon
Consultation Briefings		
05.07.21	Meeting	Community Impacts Consultation and additional documents content briefing
04.05.22	Meeting	Local Refinement Consultation and additional documents content briefing
Other Relevant Meetings		
Benefits Steering Group		
06.10.2020 – 29.04.2022	Meeting 6 occurrences	The purpose of the group is to provide a strategic oversight and make key decisions that supports the shared ambition to maximise the wider benefits of the scheme by working in partnership with others.
Sustainable Transport working Group		
21/01/2021 - 20/04/2022	Meeting 5 occurrences	The purpose of the group is to develop and deliver improvements to integrated sustainable transport infrastructure, including maximising use of the River Thames and improving connectivity and accessibility for walkers, cyclists and horse-riders
Environment Working Group		
26.01.2021 – 14.03.2022	Meeting 6 occurrences	The purpose of the group is to develop and deliver a programme of activity that increases biodiversity and habitat connectivity, enhances the landscape, and improves public access to green space.
Heritage Working Group		
13.01.2021 – 26.04.2022	Meeting 5 occurrences	The purpose of the group is to develop and deliver a programme of activity that protects and enhances our heritage through interpretation and technology as well as improving access and connectivity to archaeological finds and assets.
Skills, Education and Employment Working Group		
22.02.2021 – 16.09.2022	Meeting 7 occurrences	The purpose of the group is to work with key stakeholders within the South-East and Thames Estuary regions including local authorities, industry professionals, education and training providers and businesses, to develop a strategy that understands and aligns to local needs and priorities. Our objectives are to deliver a skills legacy, create new jobs, inspire future careers, support business growth. The final product of these discussions is the Skills, Education and Employment Strategy, which is part of the DCO application.
Community Fund		

26.01.2022 – 29.06.2022	Meetings 3 occurrences	The purpose of these meetings was to inform the group about the purpose of the Community Fund, look at relevant case studies from other large infrastructure schemes and discuss updated proposals on: <ul style="list-style-type: none"> • Themes • Geographical priority areas • Annual funding allocations • Awarding panels • Funding levels per grant • Additional funding criteria and • Support for applicants.
Other Key Designated Funds Meeting		
28.06.2021	Coastal Path	Meeting to refine the proposals for National Highways Designated Funds and provide clarity on what will be delivered. Leading to the investment of £965,000 in the route.
26.11.2021	ASELA High speed fibre connectivity	Meeting to refine the proposals for National Highways Designated Funds and provide clarity on what will be delivered. Leading to the investment of £890,000 in the infrastructure.
20.05.2022	Future of Coalhouse Fort	Partnership meeting with Thurrock Council, Historic England and National Highways to develop a plan for the conservation and preservation of the historic fort.
Key Emails Received		
October 2020 - August 2022	Email	Emails received on the following topics: <ul style="list-style-type: none"> • Traffic Modelling; outputs and programme • DCO Programme • Prematurity of Consultation • Hatch Measures • Options Appraisal • Future Proofing • Outline Business Case
September 2017 – September 2020		
Procedural Meetings		
19.09.2018 - 09.09.2020	Meeting 32 occurrences	Regular Catch-up meetings to provide updates and discuss ongoing work, actions and tasks including but not limited to planned ground investigation, land matters, surveys, PPAs, future engagement, traffic modelling.
Topic Specific Regular Technical Meetings		
20.11.2017 – 17.09.2020	Meeting 63 occurrences	Technical meetings under a range of topics including:

		<ul style="list-style-type: none"> • Thurrock Task Force • Wider Network • PRoW • DCO Requirements • SoCC Briefing • Mitigation Options • NMUs • PPAs • Construction Impacts on Local Traffic, Design and PAA • Local Plan Impacts • Operations and Survey Access • Design Development Discussions • Environmental Impacts and Mitigation and DCO Timeline/Process • Local Plan Workshop covering the emerging Thurrock Local Plan and its interfaces with the LTC and key issues of concern • Legacy, Skills and Benefits • RASA and RoSF • Engagement • GI & Archaeological Trial Trenching Update • East Facing Slips Discussion • Impact on Schools • Technical meeting to discuss traffic impacts from LTC and the traffic modelling • Construction Impacts Workshop • Designated Funds • East Facing Slips • FRA discussion with Thurrock and ECC • Demand Matrices for the Thurrock Local Plan Scenario • LTC Cordon Traffic Model
<p>28.11.17 - 22.09.20</p>	<p>Meeting 18 occurrences</p>	<p>Land Use and Traveller site Meetings to discuss</p> <ul style="list-style-type: none"> • Open Spaces study • Progress with the Local Plan • Orsett Heath Academy; effect on land, property, design and utilities • Land use and plot information • Relocation of Gammon Field Travellers site, engagement plan, surveys, site design and next steps • Pre-Examination agreements

17.09.2020 - 13.10.2020	Meeting 9 occurrences	Specific SoCG meetings under a range of topics including: <ul style="list-style-type: none"> • Design and construction • Air Quality • Biodiversity • Landscape • Noise and Vibration • Protective Provisions • Travellers site
Cross Local Authority Meetings/Workshops		
22.09.2017	Meeting	Stakeholder Advisory Briefing to further discuss traffic modelling and provide updates
01.11.2018 – 21.07.2020	Meeting 9 occurrences	Community Impact and Public Health Advisory Group discussing issues such as <ul style="list-style-type: none"> • Terms of agreement • Scoping for air quality, noise, accessibility, severance, safety, skills and legacy • Baseline data • Topics, approach and structure of the assessment • Discussion of DMRB LA 112 • Benchmarks projects and best guidance • Environmental mitigation incorporated into the assessments • Sensitive populations/communities • Key findings by topic
24.09.2019	Workshop	Design Development workshop to discuss and share the design evolution of the LTC since the feedback received at Statutory Consultation in 2018.
04.09.2019	Workshop	Design Development workshop to discuss and share the design evolution of the LTC since the workshop in April 2019.
17.10.2019	Meeting/Site Visit	Thurrock, Essex, Historic England Site Visit to discuss Coalhouse Fort and Legacy Opportunities
13.11.2019	Workshop	Design Development workshop to focus on changes to the development boundary and development of utilities diversions
03.12.2019	Workshop	Utilities Diversion workshop to focus on changes to the development boundary and to discuss utilities diversions in more detail
11.12.2019	Workshop	Construction Impacts Workshop to discuss and share the potential impacts of building the LTC, including impacts of construction, an overview of the

		transport assessment (for construction) and an update on the utilities diversions proposals
06.02.2020	Workshop	Construction Impacts Workshop to discuss and share the potential impacts of building the LTC, including impacts of construction, an overview of the transport assessment (for construction) and an update on the utilities diversions proposals
21.04.2020	Workshop	Preliminary Environmental Impacts and Mitigation and CoCP Review Workshop to discuss and share the preliminary environmental impacts, assessment methodology, significant effects and approach to mitigation for each ES topic. Topics discussed included Air Quality, Noise, Population & Human Health (including HEqIA), Terrestrial and Marine Biodiversity, Landscape Visual Impact Assessment and Cultural Heritage. Other topics discussed included DCO programme, Supplementary Consultation feedback, Code of Construction Practice (CoCP) and ongoing technical engagement
21.05.2020	Workshop	North Traffic Modelling Workshop to discuss general project update, revised cordon models, technical questions from local authorities and future ways of working and next meeting
21.05.2020	Workshop	Key Elements of the Draft DCO Workshop to discuss key elements of the DCO including Order Limits update, Further consultation (D-CON), DCO process, DCO application documents, Control Plan, Draft Development Consent Order and Schedules, Requirements and Book of Plans. Another key topic of discussion was the Statements of Common Ground; their purpose, content, principles, preparation and timescales
23.06.2020 & 25.06.2020	Workshop 2 occurrences	Two sessions on Environmental Impacts and Mitigation and REAC Review Workshop to discuss and share the environmental impacts of the Project, assessment methodology, significant effects and emerging mitigation ideas for each ES topic. Topics discussed included Air Quality, Noise, Population & Human Health (including HEqIA), Terrestrial and Marine Biodiversity, Landscape Visual Impact Assessment and Cultural Heritage. Other topics discussed included the Environmental Masterplan (EMP), securing commitments in the DCO, DCO programme and ongoing technical engagement timeline
15.09.2020	Meeting	Air Quality Technical Session with Tier 1 Authorities
24.09.2020	Meeting	LTC Protective Provisions: Drainage Meeting with Essex County Council and Thurrock Council

21.09.2020	Meeting	North Portal Landscape Discussion with Thurrock Council, Essex Place Services, Historic England
20.10.2020	Meeting	Meeting re Enhanced Statement of Significance for Built Heritage with Thurrock Council, Essex Place Services, Historic England, Kent County Council
29.10.2020	Meeting	NPS vs DMRB ; discussing the precedence of relevant guidance issue in the Cultural Heritage assessment with Thurrock Council, Historic England, Essex Place Services,
Consultation Briefings		
04.09.2019 – 11.12.2019	Workshop 4 occurrences	Supplementary Consultation Workshops: <ul style="list-style-type: none"> • Design Development workshop • Utilities Diversions update • Construction impacts workshop
03.10.2018	Meeting	Statutory Consultation Documentation Briefing
04.10.2018	Site Tour	Statutory Consultation Site Tour
15.10.2018	Meeting	Task Force Statutory Consultation Presentation

Table C.2 Key Technical Reports & Application Documents Shared

Document	Date Shared with Local Authority
DCO Application Documents and Draft documents	
DCO Application (October 2020) Vol 1 – Vol 7	1 December 2020
Updated Statement of Community Consultation	12 February 2021
Updated Transport Assessment Chapter 8	03 February 2021
Outline Traffic Management Plan for Construction	11 February 2021
Outline Site Waste Management Plan	18 February 2021
Outline Landscape and Ecology Management Plan	19 February 2021
Framework Construction Travel Plan	11 May 2021
Outline Materials Handling Plan	28 May 2021
Control documents shared as part of Community Impacts Consultation <ul style="list-style-type: none"> • Code of Construction Practice including REAC • Design Principles • Framework Construction Travel Plan • Outline Landscape and Ecology Management Plan • Outline Site Waste Management Plan • Outline Materials Handling Plan • Wider Network Impacts Management and Monitoring Plan • Outline Traffic Management plan for Construction • DCO schedule 2 and explanatory note 	Part of Community Impacts Consultation 2021
Code of Construction Practice (1st Draft)	03 May 2020
Draft DCO + Notification of Development	29 May 2020
Draft Skills, Education & Employment Strategy	23 June 2020 16 th August 2021 11 th July 2022
Draft ES Topic Chapters <ul style="list-style-type: none"> • Air Quality • Terrestrial Biodiversity • Marine Biodiversity • Geology and Soils • Material Assets and Waste • Population and Human Health • Road Drainage and Water Environment • Cultural Heritage • Landscape and Visual 	02 July – 14 July 2020

Document	Date Shared with Local Authority
<ul style="list-style-type: none"> Noise and Vibration Climate and Cumulative Effects Assessment. 	
Draft Environmental Masterplan	14 July 2020
Draft Health and Equalities Impact Assessment	03 August 2020
Code of Construction Practice (2nd Draft) + Register of Environmental Actions and Commitments	18 August 2020
Draft Design Principles	25 August 2020
Key Structures Drawings	25 August 2020
LTC Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation	07 October 2020
Draft Skills, Education & Employment Strategy	16 Aug 2021
Final Skills, Education & Employment Strategy	11th July 2022
Technical Notes and Draft Assessments	
LTC Traffic and transport assessment in DCO 2.0 (Memorandum for Stakeholders)	28 April 2022
Technical note for SoCGs	29 January 2020
Response to comments on the draft Development Consent Order issued by BDB	<ul style="list-style-type: none"> 22 June 2021 16 December 2021 28 April 2022 1 September 2022
Summary Open Space Study	30 January 2020
Draft Agreements Scoping Paper	11 February 2020
Draft Cumulative Assessment Methodology and Long & Short Lists	06 March 2020
Consultation on LVIA Update to Local Landscape Character Area Boundaries	24 March 2020
Palaeolithic and Geoarchaeological Assessment Report and Palaeolithic and Quaternary Deposit Model	03 April 2020
Green Belt Heritage Methodology	03 April 2020
Local Plan Policy Compliance Review	17 April 2020
Traffic modelling (revised DCO Cordon Model)	24 April 2020
Cultural Heritage Desk-Based Assessment	15 May 2020
Sub Regional Non-Motorised Users Study	27 May 2020
Worker Accommodation Summary	17 May 2020
Permit Scheme Considerations	26 May 2020
Draft Protective Provisions for LLDAs	03 July 2020

Document	Date Shared with Local Authority
Aggregate Use/Demand Briefing Note	17 July 2020
Flood Risk Assessment (ES Chapter 14 Appendix)	03 August 2020
Revised Issues Logs/Theme Lists	29 July 2020
Hydrogeological Risk Assessment ES Chapter 14 Appendix)	17 September 2020
Key Structures Drawings	25 August 2020
Drainage Pollution Risk Assessments (Groundwater Risk Assessments) with LLFAs/LLDAs	28 August 2020
Traffic Modelling Outputs	
Traffic count data	19 November 2018
Traffic counts (from the traffic survey in May 2018)	January 2019
Schematic Plan DR2.8 and the shapefiles showing the nodes and links in the model in Thurrock	15 January 2019
Cordon of the LTAM highway assignment model	28 January 2019
HGV data including select link matrices for the LTC, north and south of the A13, for HGVs in 2026 with LTC in place	5 February 2019
GIS shapefiles for the base year (Run 100) traffic model outputs	5 February 2019
Cordon Model for 2026 and 2041	13 May 2019
Cordon Model for 2031 and 2051	6 June 2019
GIS shapefiles for the cordon models	27 June 2019
Journey time data	8 August 2019
GIS shapefile for LTAM zoning system	12 August 2019
Additional modelling data and shapefiles for: <ul style="list-style-type: none"> • Split by year (2026, 2041) • Time period (AM, IP, PM) and • Scenarios • Saturn/node information and traffic flows 	2 October 2019
Updated GIS shapefile to include modelled link distance and modelled speed	7 October 2019
Additional modelling data with: <ul style="list-style-type: none"> • Traffic counts • LTAM network only cordon • Select link analysis for base year • 2026 with and without LTC, for all time periods • 2041 with and without LTC, for all time periods 	21 November 2019
DCO traffic model data including:	24 April 2020

Document	Date Shared with Local Authority
<ul style="list-style-type: none"> • Cordon models for all model years (Base 2016, 2027, 2032, 2042 and 2051), with LTC and without LTC for all time periods (AM, IP, PM) • LTC DCO traffic model outputs in GIS shapefile; including Saturn and node information, link time and vehicle information • Uncertainty logs 	
Coding for the East Facing Slips work (for Mott MacDonald on behalf of Thurrock Council)	22 June 2020
Traffic counts (from 2016 – 2019)	25 June 2020
Cordon models and traffic information needed for the East Facing Slips work (for Mott MacDonald on behalf of Thurrock Council) <ul style="list-style-type: none"> • Without LTC, without the east facing slips • With LTC, without the east facing slips • With LTC, with the east facing slips 	7 July 2020
Prior matrix cordon models for the East Facing Slips work (for Mott MacDonald on behalf of Thurrock Council)	24 July 2020
Demand matrices used for the Thurrock Local Plan test	28 July 2020
Thurrock Local Plan Cordons models for Thurrock sensitivity tests	12 October 2020
Thurrock construction cordon models	3 March 2021
GIS shapefiles for construction modelling	8 March 2021
2042 Thurrock emerging local plan cordon models including: <ul style="list-style-type: none"> • Without LTC and without TLR • With LTC and without TLR • With LTC and ASDA Roundabout Mitigation, without TLR 	26 March 2021
DCO2 Thurrock Cordons: <ul style="list-style-type: none"> • Updated DCO Cordon Models – for the opening year (2029), with LTC (CS31) and without LTC (CM22) • Updated Uncertainty Log for new developments 	29 April 2021
Journey times ready requested by Thurrock	6 July 2021
Lower Thames Area Model (LTAM) Cordon Model and Shapefiles	26 July 2021
GIS Shapefiles showing operational traffic model flow forecasts for the LTC	27 April 2022
Cordon Model from the LTAM (Thurrock Cordons)	29 April 2022

Document	Date Shared with Local Authority
Orsett Cock VISSIM (Micro-simulation traffic modelling software) Base Model (v2)	11 May 2022
Orsett Cock Local Model Validation Report (LMVR) (v2)	16 May 2022
LTAM DCO2 Highways Schemes Uncertainty Log	16 May 2022
LTAM Cordon Model Correspondence	24 May 2022
LTAM Zone System GIS	25 May 2022
Thurrock Cordon Models of the LTAM Construction Modelling	30 May 2022
Thurrock East-West base VISSIM model and Thurrock East-West LMVR	27 June 2022
GIS Shapefiles showing operational traffic model flow forecasts for the LTC	1 July 2022
Orsett Cock LMVR and Base Year VISSIM model (v3)	14 July 2022
LTAM DCO2 Core Scenario 2030 & 2045 AM and PM LR_CM45 & LR_CS67 Select Link GIS Total Actual Flows PCUs	29 July 2022
Orsett Cock 2030 Operational Appraisal Design Release 4.3 Operational Modelling Report	14 September 2022
Orsett Cock Junction VISSIM Model and Presentation	20 September 2022
Revised Thurrock East-West VISSIM base model and LMVR	22 September 2022
Manorway Junction VISSIM files and report	19 October 2022

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