

# Lower Thames Crossing

## 5.4.5.4 Statement of Common Ground between (1) National Highways and (2) Shorne Parish Council

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## Statement of Common Ground between (1) National Highways and (2) Shorne Parish 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 may 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 (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues 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) Shorne Parish 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 Shorne Parish Council is a Local Authority constituted under the Local Government Acts. The Parish is located to the east of Gravesend, in the Borough of Gravesham in the north-west of the county of Kent and is therefore in the western part of the Thames Gateway and Thames Estuary. The majority of the Project south of the Thames that has visible/above ground structures lies within Shorne parish.

## 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, 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 It is agreed that any matters not specifically referred to in Section 2 of this SoCG are not of material interest or relevance to Shorne Parish Council. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Shorne Parish Council. However, if

new matters arise Shorne Parish 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 It is agreed that this statement is an accurate description of the matters raised by Shorne Parish Council and the current status of each matter.

1.5.2 It is agreed that Appendix C is an accurate record of the key meetings and consultation undertaken between (1) National Highways and (2) Shorne Parish Council relation to the matters addressed in this Statement of Common Ground.

## 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) Shorne Parish Council.

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.

**Table 2.1 Matters**

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
<b>Need for the project</b>					
Project Objectives	2.1.1	Objectives need review - do not match or address actual problems: The principal problem at the Dartford Crossing is south-to-north traffic volume and flow, queuing and consequent pollution yet very little, and only temporary, relief will actually be delivered by the Project. Improving flow in that direction is inexplicably not an objective of the Project. The Project does not directly help the most deprived areas in North	The Project objectives were agreed through extensive discussions with the Department for Transport (DfT) and outline what the Project should achieve. The objectives are: <ol style="list-style-type: none"> <li>1. To support sustainable local development and regional economic growth in the medium to long term.</li> <li>2. To be affordable to government and users.</li> <li>3. To achieve value for money.</li> <li>4. To minimise adverse impacts on health and the environment.</li> <li>5. To relieve the congested Dartford Crossing and approach roads, and improve their performance by providing</li> </ol>	The Need for the Project (Application Document 7.1)	Matter Not Agreed

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
		<p>Kent (Grain and Sheppey). Objectives appear to be selected to ensure “Option C” was chosen rather than according to overall transport needs.</p>	<p>free-flowing, north-south capacity.</p> <p>6. To improve resilience of the Thames crossings and the major road network.</p> <p>7. To improve safety.</p> <p>Whilst objective (5) and (6) do not specifically refer to the south to north capacity, reduction in congestion at the Dartford Crossing and its approach roads; a reduction in journey time and improvements in resilience and connectivity alongside benefits to both the local and regional economy, are the principal benefits which would be delivered through the Project. The ‘Need for the Project’ (Doc 7.1) sets out how the identification, selection and design process has responded to the Project Objectives and how a collaborative engagement process has been used to inform the proposed Project. The Project is predicted to result in a significant reduction in traffic flow at the Dartford Crossing, which will also lead to an improvement in air quality at that location.</p> <p>As well as the objectives above, the Project is being developed in line with the National Policy Statement for National Networks, which sets out</p>		

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			government policies for Nationally Significant Infrastructure Projects (NSIPs) for England.		
Project Objectives	2.1.2	Objectives conflate different aims: The Project was originally “sold” as being about improvements at Dartford but discussion has morphed into being about economic improvement. The immediate area around the crossing in the south however receives no benefits only deteriorations.	<p>The Project is expected to deliver a range of benefits including congestion relief at the Dartford Crossing. The improved connectivity across the River Thames and reduced journey times would help local businesses to boost productivity, supporting sustainable local development and regional economic growth.</p> <p>For more information about the Project objectives and economic benefits, see the Need for the Project (Application Document 7.1) and the Economic Appraisal Package (EAP), which is Appendix D of the Combined Modelling Appraisal Report (Application Document 7.7), the Environmental Statement (ES) (Application Documents 6.1, 6.2 and 6.3), and the Planning Statement Application Document 7.2)</p>	<p>Need for the Project (Application Document 7.1)</p> <p>Economic Appraisal Package (EAP), Appendix D of the Combined Modelling Appraisal Report (Application Document 7.7)</p> <p>Environmental Statement (ES) (Application Documents 6.1, 6.2 and 6.3), Planning Statement Application Document 7.2)</p>	Matter Not Agreed
Cost of the Project	2.1.3	Question whether the Project is affordable and represents value for money: Estimated costs have so far increased by 50% to over £8billion and no doubt still rising, while	The Appraisal Summary Table within the Economic Appraisal Package (EAP) within Appendix D of the Combined Modelling Appraisal Report (Application Document 7.7) summarises the Project’s cost and benefits, while the Economic Appraisal Report provides more information	Appendix D of the Combined Modelling Appraisal Report (Application Document 7.7)	Matter Not Agreed



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		also omitting other required enabling costs such as improvements to the A229 and its junctions with the M2 and M20. There will also be other consequential costs either not presently included or identified post opening, these should all be considered in the financial evaluation.	about the appraisal methods and results.		
Project Objectives	2.1.4	Project will not deliver adequate improvement at Dartford, especially for the projected cost: Another bridge is anyway needed at the Dartford Crossing, possibly together with the “A14” long tunnel option bypassing Dartford.	Since the Preferred Route Announcement in 2017, National Highways have re-appraised routing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location.  The ‘Need for the Project’ (Doc 7.1) sets out how the identification, selection and design process has responded to the Project Objectives and how a collaborative engagement process has been used to inform the proposed Project.	The Need for the Project (Application Document 7.1)	Matter Not Agreed
Project Objectives	2.1.5	Improving resilience of the Thames Crossings is a major objective but has not been discussed	The ‘Need for the Project’ (Doc 7.1) sets out how the identification, selection and design process has responded to the Project Objectives	The Need for the Project (Application Document 7.1)	Matter Not Agreed

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		<p>so far: Apart from one Figure in the very first consultation, which showed only a “least worst” scenario, there has not been any discussion about how the Project could and will provide resilience to the Dartford Crossing, especially without gridlocking the whole of north-west Kent in the process.</p> <p>All possible scenarios need to be considered, modelled and published.</p> <p>How resilience will be provided is extremely unclear, enabling works would be needed especially for the south-north direction (e.g. at M25 J2 northbound to A2 eastbound which needs to be free-flowing, and others) but are not included in the Project.</p>	<p>and how a collaborative engagement process has been used to inform the proposed Project.</p> <p>The Project is predicted to result in a significant reduction in traffic flow at the Dartford Crossing, which will also lead to an improvement in air quality at that location.</p>		

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Project Objectives	2.1.6	Project needs reality checks: The Project seems to have developed a life of its own without being sufficiently connected to the reality of existing and predicted traffic levels in north-west Kent, which the Project will worsen, or the actual problems that need a solution.  Need to consider what success will look like, and the opposite, which outcomes are the Project delivering	The 'Need for the Project' (Doc 7.1) sets out how the identification, selection and design process has responded to the Project Objectives and how a collaborative engagement process has been used to inform the proposed Project	The Need for the Project (Application Document 7.1)	Matter Not Agreed
<b>Route selection, modal alternatives &amp; assessment of reasonable alternatives</b>					
Route Selection	2.1.7	The sequential approach discarded potentially better options from proper reconsideration: Options "D" and "E" were discarded early on but principally over the cost and difficulty of a bridge structure. Once a "tunnel only" solution had been decided, all	Since the Preferred Route Announcement in 2017, National Highways have re-appraised routing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location.  The 'Need for the Project' (Doc 7.1) sets out how the identification, selection and design process has responded to the Project's Objectives and how a collaborative engagement	The Need for the Project (Application Document 7.1)	Matter Not Agreed

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		the options should have been reconsidered in that format, also including include a hybrid between options D and E connected to M2 J5 (currently being massively reconfigured).	process has been used to inform the proposed project.		
Route Selection	2.1.8	An up-to-date reappraisal should be published with the DCO: There needs to be assurance that “Option C” remains the best and best value, most viable route.	Since the Preferred Route Announcement in 2017, National Highways have re-appraised routing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location.  The ‘Need for the Project’ (Doc 7.1) sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project.	The Need for the Project (Application Document 7.1)	Matter Not Agreed
Route Selection	2.1.9	Crossings implementation should have started furthest east: If the objectives are reviewed looking at which the Project can and can’t deliver, it becomes obvious that there is little point (and	The Project objectives were agreed through extensive discussions with the Department for Transport (DfT) and outline what the Project should achieve. The ‘Need for the Project’ (Doc 7.1) sets out how the identification, selection and design process has responded to the Project Objectives and how a collaborative	The Need for the Project (Application Document 7.1)	Matter Not Agreed

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		there is economic disbenefit) to bringing strategic traffic past the Medway Towns via the M2 when it could have crossed the Thames much further east. The Project objectives refer to sustainable development.	engagement process has been used to inform the proposed project.		
<b>Consultation and engagement</b>					
Number of Consultations	2.1.10	<p>Too many Consultations: There have been six Consultations since 2017, it has been very difficult to read all the documents and respond.</p> <p>Often information provided, and therefore comments that had to be made were very similar, other times there were very large differences.</p> <p>Changes were not highlighted so every word had to be read again to detect differences.</p>	<p>The five consultations that have taken place since 2017 have been beneficial to ensure the public and stakeholders have had opportunities to provide feedback on what is a large and complex project as it has been developed over time. Development of a project of this scale is an iterative process. As the design develops and is taken to consultation, feedback leads to a need to modify the proposals, and some of these modifications require further consultation. It is normal for a project of this size to hold a series of rounds of consultation.</p> <p>As National Highways developed each consultation, careful checks were undertaken to make sure that the changes from the previously consulted</p>	Consultation Report (Application Document 5.1)	Matter Not Agreed

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			<p>proposals were highlighted, but also that the full nature of the proposals following the changes remained clear.</p> <p>National Highways undertook the Community Impacts Consultation to directly address concerns raised by local authorities, including Gravesham Borough Council, that further consultation was required prior to submission of the DCO application.</p>		
Consultation documents	2.1.11	Consultation documents had varied availability and ease of access: Getting hold of the documents was sometimes difficult and they were not easy to access or view. Cross referencing is extremely difficult as is finding references indicated in National Highways responses.	National Highways have developed the consultation materials in a way that is designed to help the public access information at the level required. The consultation guides provided an entry point, from where people could then read in further depth into the areas that were of particular concern. National Highways acknowledges that due to the volume and quality of the consultation responses received, the volume of information provided, particularly in the You Said We Did document, was large. However, it was important to provide responses to all stakeholders. National Highways worked carefully on the referencing to try and make access into the documentation as straightforward as possible.	Consultation Report (Application Document 5.1)	Matter Not Agreed

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Consultation presentation	2.1.12	Data not updated, re-presentation misleading: Old data was presented again in different formats rather than the later Consultations containing new/updated data. By altering the formats the false impression was given that that there was new information being published.	During the Community Impacts Consultation, data from the withdrawn DCO submission was used to set out the environmental impacts associated with the operation of the project. National Highways applied a simplification to this data to make it more understandable for the public. This was the first time this data had been shared in a public way. National Highways recognise that because [some stakeholders including] Shorne Parish Council had received the Environmental Statement that was prepared as part of the withdrawn DCO submission in 2020, they had already seen this data, however there was no intent to mislead, and the data is considered to be suitably representative of the forecast impacts of the project.	N/A	Matter Not Agreed
Consultation Promotion	2.1.13	Publicizing varied greatly, and therefore affected the number and nature of responses elicited, impact of consultation fatigue: The first Consultation was e-mailed to the entire Dart Charge e-mail list, this skewed both quantity and	At the start of the Statutory Consultation National Highways used the Dart Charge email to notify customers of the Dartford Crossing. One of the objectives of this consultation was to gather information on the need for the Project and impacts on road users, and as a project objective is to relieve the congested Dartford Crossing and approach roads, National Highways	Consultation Report (Application Document 5.1)	Matter Not Agreed

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		<p>quality of the responses, whether they looked at the full documentation or just believed the headlines. Subsequently the number of responses has fallen to very low numbers (only 1206 in July 2021), although overall quality of responses may therefore be higher.</p>	<p>considered it appropriate to consult the customers. National Highways then also used this channel for the Community Impacts Consultation in July 2021 (responses actually totalled 3218), again to understand the impacts on customers.</p> <p>At each consultation we have reviewed each response on its own merits, to understand the individual concern. While the Dart Charge emails did likely lead to a significant increase in the responses, this did not lead to a reduction in the level of consideration given to a local respondent.</p>		
<p>Consultation Information</p>	<p>2.1.14</p>	<p>Misleading Consultation information: The first Consultation showed a two lane tunnel, no other structures, a very small A2 junction footprint, narrow emergency access, no side feeder roads etc – these and other aspects were then superseded by very different and greatly expanded proposals. These omissions would have</p>	<p>The consultation on a tunnel with two lanes was our Route Consultation in 2016. This consultation set out a series of route options for consideration and resulted in the Secretary of State selecting the current proposed route in 2017. This consultation was undertaken at a relatively early stage of design, when it was considered that only two lanes would be required to meet the scheme objectives, and all routes were presented on a similar basis (i.e. all routes were represented as two lanes in each direction). Following the selection of the route, the design and</p>	<p>Consultation Report (Application Document 5.1)</p>	<p>Matter Not Agreed</p>



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		<p>misled responders about the true impact.</p>	<p>traffic modelling were developed further, and it was identified that three lanes were required. This was reflected in the proposals set out in the Statutory Consultation in 2018, and in consultations after that. Prior to the Statutory Consultation in 2018, a review was undertaken to consider the changes that had been made to the project, including the changes both to the connection between the Project and the A2, and the increase from two to three lanes. This review found that the increased scale of the project, noting that similar modifications would have been need at other locations, would not have led to the Secretary of State making a different decision in 2017.</p>		
<p>Consultation Responses</p>	<p>2.1.15</p>	<p>Not all concerns raised are addressed or given a public response: Some concerns that have been raised by many responders are not addressed or receiving a response. Response documents discuss the most frequently raised concerns but there could be important</p>	<p>Due to the volume of consultation responses provided,(28,493) at Statutory Consultation, it was not practical to provide a response to each individual response. Instead a process of coding the responses to provide a single response to multiple issues was undertaken. This approach is set out in the Consultation Report, and an earlier version of the report was provided to Shorne Borough Council for consideration. This process informed the preparation of</p>	<p>Consultation Report (Application Document 5.1)</p>	<p>Matter Not Agreed</p>

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		<p>points raised by only one person, these should be included rather than being edited out and hidden/ignored. Responses in response documents are often repetitive pasting and not truly answering the point raised, they can come over as dismissive of valid concerns.</p>	<p>the You Said, We Did document, as well as the consultation report. This approach is commonly used for projects of this scale, and aligns with guidance.</p>		
<p>“Ward summary” presentation</p>	<p>2.1.16</p>	<p>“Ward summary” presentation disguised disbenefits: Some data was presented in Ward Summaries, this had some benefits but also disbenefits for the largest Ward south of the river Thames (Shorne, Cobham and Luddesdown) because it is so large, stretching from the middle of the Thames to the southernmost parts of Gravesham, and the impacts vary greatly within its area, being</p>	<p>The decision to use ward boundaries to present the Project’s impacts was discussed with local authorities before consultation and National Highways considered feedback on the approach and the ward selection at that time. While drafting the ward summary chapters, National Highways accounted for the fact that some wards were larger than others and that some were more heavily impacted than others. National Highways tailored the information in each ward to the size and level of impacts, and some wards with fewer or similar impacts were presented together in a joint chapter. Larger and more heavily impacted wards were presented with</p>	<p>Consultation Report (Application Document 5.1)</p>	<p>Matter Not Agreed</p>

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		<p>greater north of the A2 than to its south.                      For future publications the ward should be split along the A2 into north and south sections.                      [SPC note July 2022 – The warding arrangements were changed in the recent Electoral Boundary Review, Shorne is now combined into a Ward with Higham. So future publications should consider Shorne and Higham separately.</p>	<p>one ward per chapter. Shorne, Cobham and Luddesdown ward was one of the largest wards featured in the document and the National Highways provided more information in its chapter, ensuring that the content was proportionate to the impacts. For example, the Shorne, Cobham and Luddesdown chapter was 94 pages long, with more information about the northern section of the ward that would be most affected by the project. Nearby Higham ward was covered in 58 pages because it covers a smaller area and would be impacted by the project to a lesser extent than other wards.                       Overall, we consider our Ward Impact Summaries document to have provided consultees with a proportionate amount of information about the areas that would be affected by the construction and operation of the Project.</p>		
Information Provision	2.1.17	<p>Withheld or “Confidential” information provision: Not all information that we needed/requested was provided to the Parish Council, this is</p>	<p>National Highways have provided detailed information to Shorne Parish Council. To supplement the information provided during the public consultations, National Highways have provided the withdrawn DCO application documents, which included</p>	N/A	Matter Not Agreed

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		<p>very frustrating and still ongoing. Updated traffic data in particular has been provided to Gravesham Borough Council and Kent County Council under a Confidentiality agreement but not to the Parish Council. National Highways say that Gravesham Borough Council can provide it to us but GBC consider that they cannot.</p>	<p>full documentation of the traffic model. National Highways takes a proportionate approach to the sharing of information, and has worked with the local planning authorities and highways authorities to make sure they have access to the latest data sets. Nevertheless, the data provided to Shorne Parish Council is considered to be representative for the purposes of understanding the impacts, both adverse and beneficial, of the Project.</p>		
Route Design changes	2.1.18	<p>Decision making processes are opaque: Aspects of the proposals change without us being able to understand why, this is sometimes connected to Statutory bodies such as Natural England, Areas of Outstanding National Beauty (ANOB) – “stakeholders” who do not consult or communicate with residents and Parish</p>	<p>National Highways work hard to balance the concerns of all stakeholders in making decisions relating to the Project. The framework for consideration is set out in the National Policy Statement for National Networks (DfT, 2014), which sets out how certain aspects, such as impacts on AONB, impacts on Green Belt, and environmental impacts such as noise and air, should be considered. This needs to be factored into the decision making, and at times leads to certain statutory bodies, who are tasked with protecting specific designations or assets, being given additional weight.</p>	N/A	Matter Not Agreed

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		Councils but influence the plans from afar without having or seeking any local knowledge. National Highways give these non-representative organisations too great a weight.			
Collaboration of the Project with Local Authorities	2.1.19	Too much working is isolation by Local Authorities: The different local authorities have different responsibilities but their inputs into planning also overlap. While it is good if several responses say the same thing independently of each other, given the enormous size and consequences of the project it would be better if there was a requirement and facilitation to collaborate between local authorities working	National Highways cannot determine how local authorities choose to work. National Highways have set up a number of joint sessions with the local authorities but cannot influence how they work together.	N/A	Matter Under Discussion

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		together and including SPC			
Information event request	2.1.20	In 2017 SPC requested an additional information event to be held in Shorne West/Riverview.	In response to this request National Highways held an additional event for Riverview residents.	N/A	Matter Agreed
<b>Land and Compulsory acquisition</b>					
Extent of order limits	2.1.21	Enormous land take: After expansion of the order limits and compensation/mitigation land needed, Shorne has about one third of its total area affected.	Throughout the development of the Project, land use has been revised as the proposals have been progressed. Between Statutory Consultation in 2018 and Supplementary Consultation in March 2020, the Order Limits increased, largely due to additional land needed to divert utilities and the development of the proposals to establish natural habitat areas, including the planting of trees and vegetation. Following Supplementary Consultation, work continued with stakeholders, including utility companies, to refine the proposals and minimise the land needed. Consultation took place on revised Order Limits (22.9km <sup>2</sup> across the whole project) during Design Refinement Consultation in July 2020. This reduced the amount of land needed for the Project from that proposed at Supplementary	Land Plans (Application Document 2.2)  Statement of Reasons (Application Document 4.1)  Need for the Project, (Application Document 7.1)	Matter Under Discussion

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			<p>Consultation (26km<sup>2</sup>), while remaining above what was proposed at Statutory Consultation (21km<sup>2</sup>). At Community Impacts Consultation in July 2021 the order limits were reduced further to 22.2km<sup>2</sup>. At Local Refinement Consultation (May 2022) following engagement with stakeholders and refinements to the utility design, the order limits were further refined in certain areas and the order limits increased to 24.35km<sup>2</sup>.</p> <p>Land was added to include four habitat compensation areas including Shorne Woods. These sites are proposed to compensate for the potential effects from nitrogen caused by the forecast changes in traffic as a result of the Lower Thames Crossing.</p> <p>The land required for the Project is shown on the Land Plans (Application Document 2.2) and the reason each plot is required is explained in the Statement of Reasons (Application Document 4.1). Reducing the impacts of the Project on the environment is one of the Project requirements (see the Need for the Project, Application Document 7.1). At every step of the Project’s lifecycle, consideration has been given and efforts have been made to reduce the environmental</p>		

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			impacts, while still fulfilling the needs of the Project. National Highways has followed the mitigation hierarchy of 'avoid, minimise, restore and compensate' to protect the environment in which it would be situated and in keeping with industry best practice.		
Green Belt impact	2.1.22	The land that the crossing will take is Green Belt, what is supposed to be a strategic gap between built up areas and providing them with green recreational space and clean air. There should be a specific discussion about impact on Green Belt Land (as well as Ancient Woodland, SSSI's, Special Protection Areas, Ramsar Site etc).	Further information is provided in the Green Belt Report Appendix E of the planning statement.	Planning Statement Green Belt Report Appendix E	Matter Under Discussion
Order limits selection methods	2.1.23	Opacity of inclusion and exclusion of land from order limits: The method by which land is included/excluded is opaque and seems to have involved some	For any land within Order Limits National Highways must be able to demonstrate its need, or function, and also evidence compliance with statute and policy guidance.  PA2008 CPO guidance states;	N/A	Matter Not Agreed



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		<p>negotiations which may not be in the interest of all local residents. E.g. if one piece of land is negotiated out, another person’s land may be taken, even if much more remotely from the Project.</p> <p>Effect of taking land that speculators would like to develop, sends problems elsewhere.</p>	<p><i>“Section 122 of the Planning Act provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that; the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development..., and, there is a compelling case in the public interest for the compulsory acquisition.</i></p> <p><i>Applicants must therefore be prepared to justify their proposals for the compulsory acquisition of any land to the satisfaction of the Secretary of State”</i></p> <p>It goes on to say;  <i>“The applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate”</i></p>		

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Loss of agricultural land	2.1.24	Severance of land and farm viability, loss of productive farmland: Some proposals have rendered farms non-viable or taken the centre rather than the edge. Loss of productive farmland threatens food security and increase food miles.	Agricultural land impacts are provided in Chapter 10 (Geology and Soils) which will be informed by information contained within Appendix 10.4 (Agricultural Land Classification) of the Environmental Statement.	Environmental Statement Chapter 10 (Geology and Soils) Appendix 10.4 (Agricultural Land Classification)	Matter Under Discussion
<b>Design – Road, Tunnels, Utilities</b>					
Green bridges, width and nature	2.1.25	Width can always be greater, using a lot more cut and cover, this would increase protection of nearby residents from noise, light and air pollution.  Discrepant plan for Thong Lane green bridge not yet corrected. Question likelihood of anything being able to grow in the fumes from 18 lanes of tarmac.	The green bridge carrying Thong Lane over the Project was widened as part of design revisions presented during supplementary consultation.  As at Local Refinement Consultation in 2022 National Highways have widened the replacement green bridge at Thong Lane over the M2/A2 by a further 10 metres.  The design of these green bridges has been informed by the practicalities of constructing replacement structures over the A2, whilst needing to avoid the total closure of the A2 during this process, as closure of the A2 was deemed to be too impactful to the wider road network. This balance between level of 'greening' and	Design Principles document (Volume 7, Application Document 7.5, Appendix B Project Enhanced Structures – Bridge Diagram).	Matter Under Discussion

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			<p>keeping the A2 open during construction is something that we have discussed during our design workshops with Gravesham Borough Council and Kent County Council. National Highways have therefore sought to provide as much planting as possible on the green bridges that span the A2 corridor without requiring closure of the strategic road network in this location or impacting on third party green bridges that span the gap between the A2 and HS1 railway, which the new A2 green bridges need to tie-in to, thereby providing connectivity across the whole A2-HS1 corridor. Further information is contained within the Design Principles document (Volume 7, Application Document 7.5, Appendix B Project Enhanced Structures – Bridge Diagram).</p> <p>Regarding Thong Lane north green bridge, National Highways acknowledge that it was shown incorrectly as a straight line (instead of curved) at Community Impacts Consultation and has since been corrected in the latest consultation material.</p>		

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Loss of A2 wooded central reservation	2.1.26	Unhappy about the highly wooded central reservation being lost, it softens the appearance and masks noise.	Options were explored to both retain the central reservation, or to re-instate the central reservation. However, both options would have resulted in the further widening of the A2/M2 corridor and encroach further into the adjacent ancient woodland and SSSI areas. It was felt better to keep the A2/M2 corridor as narrow as possible to reduce impact on the existing woodland.	N/A	Matter Not Agreed
Landscaping for local benefit	2.1.27	Landscaping should be focused on and primarily to benefit local residents before any beautification to improve user experience.	National Highways aim is to provide a balance of suitable mitigation against the existing heritage and character of the local area. For example, Thong Village conservation area is described as having open views out to the countryside, so where possible these have been retained, woodland planting has been provided to the south-west of Thong Village to provide visual screening of the junction and its associated infrastructure. To the west, the Project is in a cutting, so where possible open views are retained. A walking, cycling and horse-riding strategy has been woven into the landscape design to ensure a variety of routes in this area, connecting Gravesend with the wider countryside and the country parks.	The Project Design Report (Application Document 7.4, Part D: General Design South of the River and Part E: Design for Walkers, Cyclists and Horse Riders)	Matter Under Discussion

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			The Project Design Report sets out how the preliminary design was developed - Application Document No.: 7.4, <i>Part D: General Design South of the River</i> and <i>Part E: Design for Walkers, Cyclists and Horse Riders</i>		
Removal of access from northern feeder road to M2 eastbound	2.1.28	Removal of access from northern feeder road to M2 eastbound, should be restored: This was in earliest plans then removed without prior discussion. Claims of lack of safety are not accepted as valid, it should be reinstated. Removal means a long diversion for some directions of traffic via routes that will be choked/jammed at peak hours. There will be an increase in rat running through Shorne by traffic previously turning onto the A2/M2 at Brewers Road.	A direct link is not provided to the A2/A289 however a new two-way local link road is provided to cater for this movement. A direct link to the M2 eastbound is provided.	N/A	Matter Not Agreed
Increased journey times	2.1.29	All directions of travel are being made more difficult and journeys will	National Highways have looked at the junction configuration and have provided more direct connectivity	N/A	Matter Not Agreed

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		<p>be longer, traffic light facilitation is needed: From Shorne and Gravesend East it will be exceedingly difficult to make many journeys (including accessing stations, supermarkets and shopping centres): To reach A2 westbound requires negotiating several traffic light-controlled roundabouts To reach M2 eastbound requires long diversion of extra 2km on A289 northbound then U-turn at Higham, already a busy and jam prone route, this needs traffic light facilitation. An alternative route via northbound from Shorne village requires a hazardous right turn at a busy and fast crossroads on the A226, this needs traffic light facilitation. Traffic from Gravesend East cannot access the A2/A289, only the M2,</p>	<p>between Gravesend and the M2 eastbound &amp; redesigned the Gravesend East junction and link roads to improve journey times and will reduce the impact on the local roads.</p> <p>National Highways would like to clarify that the A2 corridor and local road network has been designed to current standards and traffic modelling undertaken to assess its impact on traffic flows. This has shown that the layout and capacity of referenced junctions are suitable for the predicted traffic flows.</p> <p>In addition, a review of the pedestrian crossings has been undertaken and controlled crossings are to be provided where required.</p>		

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		<p>this will also lead to traffic travelling further and for longer. The design there should also be revisited as an extra link could be provided.</p> <p>Difficulty exiting Thong Lane onto the southern two-way link road when wanting to travel west on the A2 as need to turn right across the dominant traffic flow, may need traffic lights or yet another roundabout.</p> <p>Increased journey times for local residents cause increased personal costs.</p>			
Reduction of M2 to two lanes eastbound through Gravesend East	2.1.30	The width of the M2 line has been reduced from current four lanes to only two through Gravesend East, SPC do not believe this will be adequate.	This section will still provide the capacity for the forecast traffic flows for two lanes (Transport Assessment 7.9) The Transport Forecasting Package will have some of the flow numbers (inc at the A2/M2/LTC junction) - App C of the Combined Modelling and Appraisal Report (ComMA) (7.7).	<p>Transport Assessment (Application Document 7.9)</p> <p>Appendix C of the Combined Modelling and Appraisal Report (ComMA) (Application Document 7.7)</p>	Matter Not Agreed

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Sight lines exiting Shorne Ifield Road to Thong Lane	2.1.31	Sight lines exiting Shorne Ifield Road to Thong Lane need improving: The Project works are altering the road layout so that Shorne Ifield Road emerges on the inside of a blind bend with inadequate visibility, this needs to be corrected by revising the alignment of Thong Lane.	National Highways have clarified that the realignment of Thong Lane has been designed to current standards and the required visibility at this junction is provided in both north and south directions.	N/A	Matter Not Agreed
Lack of hard shoulders	2.1.32	Raised many times, whether classified as Smart Motorway (as originally), Expressway or whatever the Project is now being called (All-purpose trunk road?), hard shoulders are needed for safety reasons.	Improving safety is one of the project's objectives. The Lower Thames Crossing would be an all-purpose trunk road, similar to the A13 and other A-roads. It is being designed and built to the highest safety standards recommended, but National Highways will continue to adapt our proposals in line with new guidance. The new road's safety features would include vehicle detection, emergency areas, variable mandatory speed limits and lane closure signals in the event of an incident, such as a vehicle breakdown or collision. Control measures across the route, including in the tunnel, would identify vehicles stopping in a live lane and	Consultation Report (Application Document 5.1).	Matter Not Agreed



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			<p>allow for rapid changes of traffic management to avert danger. In the tunnels, recovery services would be provided for any stopped vehicle. Technology would also help the emergency services to access incidents. This includes signage that can be changed to alert road users of lane closures, speed restrictions and incidents ahead. If one tunnel is blocked, emergency vehicles could access incidents using the pedestrian cross-passages that connect the two tunnels at regular intervals.</p> <p>Further information is presented in the Consultation Report (Application Doc 5.1).</p>		
Location and nature of southern tunnel control building, and pumping stations, other structures	2.1.33	Extra structures appear on new plans despite assurances that will not happen, questions about the tunnel control building and pumping stations remain unanswered.	At Supplementary Consultation the Project consulted on 3 potential locations for the proposed substation at the A226 of which the preferred location was presented at the Design Refinement Consultation. At the Design Refinement Consultation the Project also communicated the proposal to install a compound along Thong Lane for the relocated switchgear equipment. Following feedback the proposals were combined at the A226 and presented at Community Impacts Consultation.	N/A	Matter Not Agreed

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			The tunnel control building, and potentially the pumping station will be located within the portal itself.		
Tunnel Drainage	2.1.34	SPC felt that more information on the method and route for tunnel drainage was required but acknowledge the National Highways comment and now understand that this will be further explained in the Hydrogeological Risk Assessment.	Tunnel drainage will be pumped to a treatment and storage facility in the vicinity of the north portal and discharged from a new outfall that would be constructed on the north bank of the River Thames in proximity to the existing Bowaters Sluice. The Hydrogeological Risk Assessment provided as Appendix 14.5 of the Environmental Statement provides further information.	Environmental Statement Hydrogeological Risk Assessment Appendix 14.5	Matter Under Discussion
Design for local weather conditions	2.1.35	Design must be for true local weather conditions (e.g. torrential rain, sea fogs as in Estuarine weather) and for peaks rather than looking at averages measured at distant monitoring stations e.g. rainfall data used was from Heathrow.	National Highways has designed the Project for the appropriate conditions and has taken extreme weather events into account.  More information is provided in the Environmental Statement Appendix 15.3 - Climate Resilience Impacts and Effects and Appendix 4.2 - Major Accidents and Disasters Long List	Environmental Statement Appendix 15.3 - Climate Resilience Impacts and Effects and Appendix 4.2 - Major Accidents and Disasters Long List	Matter Under Discussion

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Protection from rat running on local roads	2.1.36	Where the proposed layout is likely to result in additional traffic flow and rat running being induced on local residential and unsuitable roads, protective solutions should be integral to/integrated with the Project.	<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> <p>An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) is included in the application, providing information about the proposed traffic monitoring.</p>	Wider Network Impacts Management and Monitoring Plan (Application Document 7.2)	Matter Not Agreed
Junction of LTC with A226 (removed)	2.1.37	Objections were raised to the insertion of this junction, which caused widespread shock and strong objections concerning traffic impacts from many sources, including from SPC. The junction was subsequently removed from plans however the principal reason was probably that engineering considerations required	National Highways removed the A226 Junction from the design in Nov 2017.	N/A	Matter Agreed

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		the tunnel to be longer and deeper, which made the junction non-viable.			
Footbridge on footpath NG7 (removed)	2.1.38	Objections were raised SPC and others to the very high footbridge proposed on footpath NG7, which had very poor ambience (due to crossing a very wide chasm containing the Project) and introduced a suicide risk location. With the elongation of the tunnel (see previous point) it was not needed and was removed.	National Highways amended the Tunnel portal design by extending it a further 350m and footbridge over the tunnel was diverted in January 2020.	N/A	Matter Agreed
Informal parking area near Thong Lane north green bridge (removed)	2.1.39	Objections were raised by SPC and others when this proposal suddenly appeared in the plans in an inappropriate location. It was subsequently removed again.	The parking area is now proposed at Thong Lane & has been proposed in consultation with the county park; this area will be created by the Project and then handed over to be run by a third party.	N/A	Matter Agreed
<b>Construction</b>					
Construction information	2.1.40	More info needed on liaison with constructors, lighting, working hours, nature of	National Highways has sought to reduce its impact on local community during its construction phase. Mitigation measures are included in	Register of Environmental Actions and	Matter Under Discussion

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		<p>compounds and their access routes: Some information may come later but presently there are concerns over how liaison will occur with the community, nocturnal lighting, noise, what the compounds are for and how they are accessed.</p>	<p>the CoCP (REAC) to minimise the potential effects of dust, noise, and light impacts.</p> <p>Working groups such as the Community Liaison Groups and Traffic Management Forum will be key forums to ensure that the community is kept informed of the Project and are therefore prepared for forthcoming changes and construction activities. As set out in the Code of Construction Practice (Application Document 6.3), National Highways will work closely with stakeholders on the membership of the groups which will include representatives from the local community including Shorne Parish Council.</p> <p>The Outline Traffic Management for Construction (App Document 7.14) details how construction traffic will be managed to mitigate effects on the local community.</p> <p>Environmental Statement Chapter 12 Noise and Vibration includes noise and visual assessments from construction activities including working hours from several perspectives (e.g. noise) which has informed mitigation measures.</p>	<p>Commitments (REAC) (App doc 6.3)</p> <p>Code of Construction Practice (CoCP) (Application Document 6.3, Appendix 2.2)</p> <p>Outline Traffic Management Plan for Construction (Application Document 7.14)</p> <p>Environmental Statement Chapter 12 Noise and Vibration</p>	
Use of staff construction	2.1.41	Concern about construction staff large	Details of potential haul routes were supplied at Supplementary	Code of Construction Practice (CoCP)	Matter Under Discussion

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vehicles on residential roads		vehicles using residential roads: Many roads locally are narrow and not suitable for increased traffic, staff vehicles should also access compounds through routes within the construction boundary rather than by residential roads. The concern arises that staff vehicles are larger and heavier than what residents would regard as standard private cars.	<p>Consultation in January 2020. National Highways are committed to a Traffic Management Plan for Construction (TMP) in the DCO, which will be developed post DCO consent by the Contractor, in line with the controls in Outline Traffic Management Plan for Construction (Application Document 7.14) and the approved Code of Construction Practice (CoCP) (Application Document 6.3). Environmental Statement Chapter 12: Noise and Vibration will present a full assessment of noise and vibration. National Highways explained that HGVs will be banned from some routes, as outlined in OTMPfC. The use of the strategic road network and local road network is required to deliver the works. Existing restrictions will be respected.</p> <p>Temporary offline haul routes will be constructed directly off the strategic road network where possible.</p>	<p>(Application Document 6.3, Appendix 2.2)</p> <p>Outline Traffic Management Plan for Construction (Application Document 7.14)</p>	
Milton Compound and ground preparation tunnel	2.1.42	Milton Compound and ground preparation tunnel, multiple concerns: Milton Compound is within the North Kent Marshes Special Protection Area	National Highways are aware of the condition of the existing access road. Localised strengthening will be required along with a full condition survey before construction takes place. The road will be upgraded	N/A	Matter Not Agreed

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		<p>(SPA) and could negatively affect the Thames and Medway Canal bed and banks though access by very heavy vehicles and the construction of the ground preparation tunnel, assurances are needed.</p> <p>Concerns about injection of “grout” could cause damage, dewatering and contamination, have asked for more info including about other places where it has been used successfully.</p> <p>Concerns about access routes.</p>	<p>where necessary in order to cope with the loadings and frequency required. These proposals have been discussed with the Thames and Medway Canal Association</p> <p>All works will be carefully planned, designed and executed, with full cognisance of the impacts caused and mitigated as far as feasibly possible. The Canal will be reinstated as agreed with the relevant bodies, as agreed, prior to works commencing.</p> <p>The grout tunnel remains a contingency measure, and that we do not know will be necessary until detailed design.</p>		
Dewatering	2.1.43	<p>Concerns about effect of any deliberate dewatering e.g. for ground preparation tunnel, the Chalk compound close to the church.</p> <p>Need clarification of all activities there.</p>	<p>The effects of the Project’s construction activities, as well as its operation have been subject to extensive studies, undertaken in collaboration with the Environment Agency and Natural England. The studies, described in Environmental Statement Appendix 14.5 Hydrogeological Risk assessment demonstrate that, with the embedded and secured design and mitigation in</p>	Environmental Statement Appendix 14.5 Hydrogeological Risk assessment	Matter Under Discussion

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		Also concerned about any unintended dewatering of marshes as has occurred e.g.at HS1 at Swanscombe.	place, there will be no significant effects		
Bridge closures on Brewers Road and Thong Lane	2.1.44	<p>The duration of bridge closures, which cause considerable disruption to local residents, should be minimised but preferably through measures other than 24h working.</p> <p>Thong Lane north bridge – should be possible to divert traffic to the side while bridge is built</p> <p>Brewers Road – minimise time, consider possibility temporary use of Park Pale bridge</p> <p>The above and Thong Lane south overbridge should not be closed simultaneously.</p>	<p>Brewers road and Thong Lane are never closed at the same time to ensure access across the A2 is not completely severed. This is a commitment that will be secured in the Outline Traffic Management Plan for Construction (OTMPfC).</p> <p>National Highways will work with the authority and contractor, collectively, during detailed design phase to optimise the solution to reduce duration as far as is reasonably practicable.</p> <p>National Highways will continue to engage with Shorne Parish Council regarding the proposed duration of bridge closures.</p>	Outline Traffic Management Plan for Construction (Application Document 7.14)	Matter Under Discussion
Protection of residents during construction	2.1.45	Tree planting in final position plus protective earth bunds should be put in place at the earliest possible date.	Environmental Statement Chapter 12 Noise and vibration includes noise and visual assessments from construction activities. Mitigation measures have been proposed to lessen the impact of	Outline Traffic Management Plan for Construction (Application Document 7.14)	Matter Under Discussion



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		<p>Night-time working should be avoided as much as possible, maps of affected areas were not clear.</p> <p>Summer working hours are too long (06.00 to 23.00).</p> <p>Haul roads are very close to residential locations.</p>	<p>these activities to residential housing including the use of bunds and fences where deemed appropriate.</p> <p>Woodland planting will also be specified to suit its mitigation needs when required for visual screening.</p> <p>Night working is proposed usually where traffic conditions wouldn't allow daytime closures due to the impact on traffic.</p> <p>Extended working hours (after 19:00) are intermittent and are required to cover certain construction activities that require more than the standard working hours to be completed. More information is provided in the Code of Construction Practice (Application Document 6.3).</p> <p>The Outline Traffic Management Plan for Construction (Application Document 7.14) outlines a proposed traffic forum which would be the forum to discuss the appropriate traffic measure to implement and would have input from key stakeholders.</p>	<p>Code of Construction Practice (Application Document 6.3).</p>	
Widening of A226	2.1.46	<p>Concern any widening should be temporary and reversed post construction.</p>	<p>The A226 Gravesend Road has been included in the Order Limits to allow temporary road-widening if required to maintain the safety of other road users while it is used by construction traffic.</p>	N/A	Matter Under Discussion

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Construction HGV's via Gravesend East roundabout	2.1.47	Concern about adding traffic when there are already queues back onto the A2 itself at peak times.	<p>National Highways are committed to a Traffic Management Plan for Construction (TMP) in the DCO, which will be developed post DCO consent by the Contractor, in line with the controls in Outline Traffic Management Plan for Construction (Application Document 7.14) and the approved Code of Construction Practice (CoCP) (Application Document 6.3).</p> <p>National Highways explained that HGVs will be banned from some routes, as outlined in OTMPfC. The use of the strategic road network and local road network is required to deliver the works. Existing restrictions will be respected.</p> <p>Temporary offline haul routes will be constructed directly off the strategic road network where practicable.</p>	<p>Outline Traffic Management Plan for Construction (Application Document 7.14)</p> <p>Code of Construction Practice (CoCP) (Application Document 6.3)</p>	Matter Under Discussion
Closure of footpaths and cycle routes, including long distance routes	2.1.48	These need to be minimised, access controlled rather than full closure, there must be safe alternative routes.	All works impacting footpaths/cycle paths, will be coordinated with the relevant bodies, and a number of meetings have already taken place with Gravesham Borough Council.	N/A	Matter Under Discussion
Chalk stockpiles	2.1.49	More information needed, concern about contaminated water	National Highways have provided an assessment on waste which quantifies the likely material arisings (e.g. spoil) and applies measures to divert from	Environmental Statement - Chapter 11 Material	Matter Under Discussion

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		efflux reaching marshes.	<p>landfill. This is in the Environmental Statement - Chapter 11 Material Assets and Waste (Application Doc 6.1). Environmental Statement App doc 2.2 - Register of Environmental Actions and Commitments (REAC) (App doc 6.3) will provide detail on committed mitigation such as location of stockpiles to act as noise and visual barriers.</p> <p>The Hydrogeological Risk Assessment provided as Appendix 14.5 of the Environmental Statement provides further information</p> <p>Further discussions will be carried out with SPC post application once the application has been published and once SPC have reviewed the application documents.</p>	<p>Assets and Waste (Application Document 6.1)</p> <p>Environmental Statement (Application Document 2.2)</p> <p>Register of Environmental Actions and Commitments (REAC) (Application Document 6.3)</p> <p>Hydrogeological Risk Assessment Appendix 14.5 of the Environmental Statement</p>	
<b>Operation &amp; Maintenance</b>					
Noise and traffic increase on residential roads	2.1.50	Concerns about noise increase, and traffic increasing on unsuitable, residential roads: It has been claimed that some narrow residential roads have increased capacity	<p>National Highways haven't claimed that any narrow roads have increased capacity.</p> <p>National Highways are committed to a Traffic Management Plan for Construction (TMP) in the DCO, which will be developed post DCO consent by the Contractor, in line with the</p>	<p>Outline Traffic Management Plan for Construction (Application Document 7.14)</p> <p>Code of Construction Practice (CoCP)</p>	Matter Not Agreed

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		but physical inspection (or driving through on Google maps) would show this not to be the case. Great concern about traffic increases blocking road, as happens now when there are problems e.g. on the A2.	controls in Outline Traffic Management Plan for Construction (Application Document 7.14) and the approved Code of Construction Practice (CoCP) (Application Document 6.3)	(Application Document 6.3)	
Future traffic noise reductions claims	2.1.51	Some claims of noise reduction seem not credible, especially versus loss of mature trees e.g.in the A2 central reservation, allegedly this will result from use of special road surfaces. Guarantees are needed over any improvements being maintained and of actions if shown not to be the case.	Essential measures have been identified to reduce road traffic noise and would be secured through the REAC such as the use of low-noise road surfacing technologies and acoustic noise barriers at certain locations where earthworks measures are not possible.	Register of Environmental Actions and Commitments (REAC) (Application Doc 6.3)	Matter Under Discussion
Operational staff traffic levels	2.1.52	SPC query the amount of traffic expected to the southern control centre as this route crosses a very busy multi-use public right of way.	The tunnel will typically be controlled from the South East Regional Operating Centre, so the local tunnel control facility will be infrequently used. The Tunnel Service Building (TSB) above the tunnel portal will be used on a daily basis by Vehicle Recovery Service (VRS) and Traffic	N/A	Matter Under Discussion

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			Officer personnel and by tunnel maintenance personnel as needed. VRS (one or two operatives) will recover broken-down vehicles from the road tunnels as necessary and the Traffic Officers will mostly be patrolling the road, but will use the TSB welfare facilities as required. Traffic Officers may also use the TSB access roads as a means of changing their direction of travel on the LTC route. Routine Tunnel Maintenance is anticipated to be undertaken on during overnight tunnel closures at one or other tunnel bore at 6 weekly intervals.		
<b>Charging</b>					
Discounts for local residents	2.1.53	Residents have expressed that they will expect to get the same discounts/free tickets as residents of Dartford and Thurrock.	Schedule 12 to the draft DCO (Application Document 3.1) contains the powers for the Secretary of State to provide a Local Residents Discount Scheme (LRDS) on the same basis as Dartford (for Thurrock and Gravesham). National Highways consider that this matter can move to agreed once SPC have viewed the Draft DCO following submission.	Schedule 12 to the draft DCO (Application Document 3.1)	Matter Under Discussion
Variable charging	2.1.54	Concern about using charge alterations to manipulate routes taken by traffic that would not	It is Government policy that major river crossings would normally be charged and therefore the Project is aligned with that policy. Charging would help	N/A	Matter Not Agreed

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		otherwise use the A2/M2 and connection routes from the M20.	manage demand and network performance across the existing Dartford Crossing and proposed Lower Thames Crossing. Charges at the new crossing would be equal in value to those in force at the Dartford Crossing.		
<b>Traffic and economics</b>					
Traffic modelling	2.1.55	Great concern that traffic data used is old, mostly from 2014-2016, SPC do not believe the results can be correct or that the statistical methodology can be valid using such old data. The general view is that the traffic data lacks credibility. Modelling only valid at regional level yet being applied to highly individual area.	The National Highways model is built in line with guidance from DfT - the Transport Analysis Guidance and standards as set out in the Design Manual for Roads and Bridges. National Highways are content that the data used in the transport model is acceptable, and the model has been assured by an independent assessor within National Highways who has confirmed it is suitable to assess the impacts of the Project. Whilst the model does include a range of detailed network parameters to reflect existing conditions, such a model can never reflect the conditions on every road, particularly those on the local road network.	N/A	Matter Not Agreed
Traffic Figures	2.1.56	“Capping” of figures, on regional basis, also not statistically viable: The traffic figures used are not the actual product of	The growth in the transport model is capped in line with Department for Transport traffic forecasts. Growth in the area surrounding the project is supplemented through developments	N/A	Matter Not Agreed

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		<p>the calculations but are modified (downwards), as they are not allowed to show predicted growth that is greater than a regional average figure.</p> <p>North-West Kent is a major growth area with great increase in housing (not all being factored into the plans, nor is the London Resort project) and therefore increased transport demands, baseline traffic is increasing greatly year on year (2.5% previously, probably more now) and the annual increase here must be at the high end of the regional range.</p> <p>If the model is correct then the output figures must be correct and should be used.</p> <p>Both the capped and uncapped figures should be published so that any underestimate</p>	<p>which are under construction, that have a planning application or permission (as of 30th September 2021 for our forthcoming DCO Application), in line with the Transport Analysis Guidance (TAG), and the overall growth in the area is constrained to the DfT traffic growth forecasts. Growth within Local Plans is not of sufficient certainty to be included explicitly in the model.</p>		

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		is transparent and realised. This also impacts on the air quality figures, for which anticipated pollution will also be underestimated. 'DfT's own documents warn against use of traffic prediction models.			
Traffic data presentation	2.1.57	Data presentation is very selective and often obscures negative impacts while also disguising that benefits may be lower than desired, e.g. HGV reduction at Dartford Crossing.	Data as presented at consultations has to be shared in a manner that is manageable for the majority of consultees. National Highways have provided more detailed information to the local highway authorities (including Medway and KCC), as well as Gravesham Borough. As previously suggested, National Highways recommend that the Parish discusses with these authorities.  Updated operational modelling and more details of the impacts during construction were shared at the Community Impacts Consultation in summer 2021	N/A	Matter Not Agreed
Traffic Modelling	2.1.58	Modelling versus reality: Choice of route is often a result of satnav's and human behaviour	The Project's Transport Model has been independently assured by National Highways as being suitable to assess the impact of the Project.	(Design Manual for Roads and Bridges) and TAG guidance as set out in the	Matter Not Agreed



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		choices of wanting to keep moving. The likely outcomes of rat running and routes that drivers will use to get from other motorways through to the Project will cause severe traffic problems throughout the areas.	The transport model has been calibrated and validated in line with relevant DMRB (Design Manual for Roads and Bridges) and TAG guidance as set out in the Transport Model Package (Appendix B of the ComMA). Given the scale and nature of the model it is not possible, or required, to achieve perfect validation across the whole of the modelled network.  The conditions and operation of local roads has been replicated as far as possible within the parameters of the software.	Transport Model Package (Appendix B of the ComMA)	
Data collection locations and quality (supplementary surveys 2019)	2.1.59	Turning point surveys were not representative – e.g. the survey for Forge Lane (Shorne) was carried out during non-peak hours on a single Saturday in June 2019 whereas on normal weekdays there is a lot of traffic going to and from the School and other work destinations.  The data collection point for Brewers Road was located between the current A2 slip	The data collected in 2019 was not used in the Project's transport model. Instead this has been used as part of our assessment into the impacts on Walkers, Cyclists and Horse-riders as a result of the project.	N/A	Matter Not Agreed

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		<p>roads and Park Pale (leading to Harlex haulage yard and the Rochester and Cobham Golf Club) and the entrance to the Country Park. Therefore the data collected does not represent vehicle use of Brewers Road itself as it continues on through Shorne. This may in part explain the difficulty we are having in marrying up our own data with HE's and we are therefore concerned about HE's possibly incorrect data being used to predict traffic volumes, and consequent noise and pollution in residential roads accessed through this stretch of Brewers Road.</p> <p>* as at 13/07/22 agree with the purpose of the data collection not being for general traffic volumes, however we still have concerns</p>			

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		about the quality of the data.			
<b>Wider Network Impacts</b>					
Wider Network Impacts mitigation on local roads	2.1.60	Traffic increases and lack of action to protect residents: Traffic will increase throughout the area on all roads both major and minor Consequences are recognised but there are no plans included to address predictable problems from the outset, these should be integrated with project.	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. An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) will be included in the application, providing information about the proposed traffic monitoring.	Wider Network Impacts Monitoring and Management Plan (Application Document 7.14)	Matter Not Agreed
Wider Network Impacts mitigation Traffic increases cannot be supported by local and wider network in North-West Kent	2.1.61	Traffic in the areas is already heavy and bad and the proposals will make it worse by drawing more traffic into the areas. Suggestions that the Project will cause reductions on small links are not credible as the Project will tend to	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	Wider Network Impacts Monitoring and Management Plan (Application Document 7.14)	Matter Not Agreed

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		pull new traffic by different routes, so cancelling out any putative reductions.	through existing funding mechanisms and processes. An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) will be included in the application, providing information about the proposed traffic monitoring		
Wider Network Impacts mitigation on A226, A227, A228 and A229	2.1.62	Traffic increases on connecting roads between the M20 to the LTC: Concern about increased traffic on the A226, A227, A228 (and A229) and local connecting roads through rat-running. The M2 and A289 immediately east of the LTC are already at capacity with frequent jams, the LTC will only make this worse. The suggested solution is to impose lower than standard motorway speed limits, which is not a helpful solution or a successful outcome as it will increase journey times for all users.	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. An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) will be included in the application, providing information about the proposed traffic monitoring.	Wider Network Impacts Monitoring and Management Plan (Application Document 7.14)	Matter Not Agreed

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Long term Monitoring	2.1.63	<p>Monitoring frequency and resolution of problems: The plan for monitoring of adverse outcomes proposes evaluation at 1y and 4y, this is much too long a gap so suggest 1y, 2y, 3y and 5y.</p> <p>How adverse outcomes identified by monitoring are going to get resolved is not clear. There will be problems where it is not physically possible to widen the roadway, and others where the source of funding is not clear or assured.</p> <p>Funding to resolve operational problems must be assured and resolution expedited.</p> <p>However there are also problems that are predictable, and those should be included within the project.</p>	<p>Monitoring would be conducted in the year before the Lower Thames Crossing opens to establish a baseline, then one and five years after the project.</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> <p>An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) will be included in the application, providing information about the proposed traffic monitoring</p>	Wider Network Impacts Monitoring and Management Plan (Application Document 7.14)	Matter Not Agreed
<b>Socio-economics</b>					

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Loss of recreational space	2.1.64	The area is losing (has now lost due to recent closure) its only, and very popular, “Pay and Play” golf course, this is not being re-provided.	<p>National Highways propose to permanently acquire the site for the new road and for landscaping. We are not proposing to replace the golf club. Instead, we propose to create a new parkland area on part of the site that would be open to the public after construction.</p> <p>National Highways have assessed the impacts of the Project on the Southern Valley Golf Course (SVGC) as a community asset. This will be covered by the Environmental Impact Assessment within our DCO application</p>	Environmental Impact Assessment Chapter 13 Population and Human Health (Application Document 6.1)	Matter Not Agreed
Increased journey times	2.1.65	<p>Increased traffic congestion and gridlock will have negative effect on economy and journey times</p> <p>Plans involve making some routes much longer and more complex.</p>	Given the widespread change in traffic patterns across the Lower Thames area it is impossible for us to provide commentary for every journey and route choice. The Ward Impact Summaries provided detail of the forecast changes to traffic at a ward level once the Lower Thames Crossing is open and can be used as a means to assess the likely impacts upon journeys that individuals may take.	N/A	Matter Not Agreed
Access to stations and amenities	2.1.66	There will be reduced and much more indirect access to stations, supermarkets, and	National Highways recognise that people will travel to different stations to complete their journeys, much as they would take different roads	N/A	Matter Not Agreed

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		other shopping locations.	depending on where their origin and destination was, as well as the purpose of their trip. Given the widespread change in traffic patterns across the Lower Thames area it is impossible for us to provide commentary for every journey and route choice. The access to station information as set out in the Community Impacts Consultation refers to the immediate access to these stations and impacts on the rail services at these stations. The Ward Impact Summaries provided detail of the forecast changes to traffic at a ward level once the Lower Thames Crossing is open and can be used as a means to assess the likely impacts upon journeys that individuals may take.		
<b>EIA methodology</b>					
Timing and extent of water surveys	2.1.67	Several of the water surveys and studies were only carried out in the driest months of the year, e.g. looking for streams, and the water flow tests at Chalk, this raises questions about the veracity of results obtained.	More information is provided in the Water Features Survey – application document 14.2 of the Environmental Statement, this includes surveys of the area of concern and was carried out in 4 phases of field work that spanned all times of the year.	Water Features Survey – application document 14.2 of the Environmental Statement,	Matter Not Agreed

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		SPC are not aware of any flow tests having been conducted between land south and north of the A226 just east of Chalk Church, which is an area of concern regarding dewatering that might be caused by excavations.			
Other Impacted land	2.1.68	The Project doesn't consider negative impact on all land that will suffer air pollution, e.g. the Parish owns "Crabbles Bottom" which is close to the M2/A289 junction but there has been no discussion about impact on our land e.g. productive orchards and meadow.	The assessment of effects from changes in air quality follows the published standard in the Design Manual for Roads and Bridges: LA105 Air Quality. This sets out the criteria for inclusion in the assessment, listing those designated sites to be considered, distances from the affected road network, and thresholds of changes in nitrogen deposition above which sites are screened in for further assessment. If the areas listed above meet those criteria then they will have been included as part of the assessment which supports the DCO application.	N/A	Matter Not Agreed
Assessment methodology	2.1.69	Some assessments are subjective, i.e. opinion and value judgements rather than being objective assessments	Chapter 4 EIA Methodology and the topic chapters of the Environmental Statement (Application Document 6.1) fully justify the methods of assessment	Chapter 4 EIA Methodology and the topic chapters of the Environmental Statement	Matter Not Agreed



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		based on properly collected and evaluated, well evidenced hard data.		(Application Document 6.1)	
<b>Air quality</b>					
Traffic data	2.1.70	Interdependence on correct traffic data: As discussed above, there are considerable concerns and doubts over the veracity of the traffic data. However, as the same capped data provides the input into the air quality predictions, if the traffic data is incorrectly low so will be the air quality predictions. Predictions use outputs from the traffic modelling and reconvert them into AADT rather than using actual AADT inputs.	National Highways have produced a suite of documentation setting out how the model has been built and how it performs (see the Combined Modelling and Appraisal Report and its appendices A,B and C (Application Document 7.7)). This includes details of the guidance and standards National Highways are required to use (including the Transport Analysis Guidance and the Design Manual for Roads and Bridges) given the Project is to be funded by the Government. The model has been assessed by an independent assessor within National Highways and has been accepted as suitable for assessing the impact of the Lower Thames Crossing on the highway network.	Combined Modelling and Appraisal Report and its appendices A,B and C (Application Document 7.7)	Matter Not Agreed
Traffic data	2.1.71	Overmanipulation of data: The air quality report is prefaced by descriptions of a considerable number of ways that figures have	The air quality assessment is undertaken in accordance with the DRMB LA105 and DEFRA's local air quality management technical guidance. This is consistent with how local authorities assess air quality as	N/A	Matter Not Agreed

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		<p>been adjusted, usually downwards, which casts doubt on the whole exercise.</p> <p>In some instances data for particular major roads was individually adjusted.</p> <p>Predictions that air quality will improve on the A2 immediately west of the LTC (close to the major junction) are not credible as additional traffic will be pulled from the west to use the LTC cancelling out any possible reduction through westbound traffic instead taking the LTC.</p>	<p>part of their local air quality management process.</p>		
<p>Inclusion of factors for junctions, long inclines etc</p>	<p>2.1.72</p>	<p>The earliest air quality calculations that were published only related to straight, flat roads.</p> <p>Assurance is needed that the figures factor in large junctions and especially that there is a 2km long, 4% incline</p>	<p>Detailed dispersion modelling has been undertaken in accordance with DMRB LA 105 guidance, which states the requirements for detailed modelling. Speed band emission factors have been used to determine the emission factors for each links, including slip roads and junctions. It should be noted that the air quality model has been extensively calibrated against air quality monitoring data</p>	<p>N/A</p>	<p>Matter Not Agreed</p>

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		slope which HGV's (the heaviest polluters) will haul up from the lowest point of the tunnel. Pollution calculations could be underestimated for this reason as well.	from 260 individual sites across the study area, to ensure that the model predictions are robust.		
Data presentation	2.1.73	Data presentation was only at either simple or PhD level, there needs to be an intermediate level of presentation that can be understood by non-experts with reasonable ability to understand technical information.	To support the technical Environmental Statement chapters, there will be the ES Non Technical Summary (Application Document 6.4) which provides a summary of the potential impacts and proposed mitigation. The Community Impact Report (Application Document 7.16) will also help readers understand the impacts of the Project at a local community ward level.	Environmental Statement Non Technical Summary (Application Document 6.4) Community Impact Report (Application Document 7.16)	Matter Under Discussion
Sampling methodology	2.1.74	Air quality sampling was undertaken mostly using NO2 diffusion tubes but these are known to be more unreliable and give lower readings than fixed sampling stations. Therefore the calculations could be also underpredicting for this reason.	A combination of diffusion tubes and automatic analysers has been used to verify the air quality model. Whilst it is acknowledged that diffusion tubes are not as accurate as automatic monitoring stations it is not possible to undertake large scale monitoring campaigns using automatic stations given both cost and infrastructure required to power the stations.	N/A	Matter Not Agreed

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Sampling points	2.1.75	Air quality sampling is not being undertaken at points where people live close to a road where traffic levels are predicted to rise as a consequence of the project, e.g. the A227 at Meopham and the A228 at Cuxton.	The assessment has been informed by air quality monitoring obtained from an extensive area, which includes areas where the highest pollutant concentrations and traffic impacts are expected as a result of the Project. There are numerous air quality monitoring sites on the A227, A228 and A229 as shown in Figure 5.4: Air Quality Monitoring Sites of the Environmental Statement.	N/A	Matter Not Agreed
Creation of new exceedances of regulatory levels, and other deterioration in air quality	2.1.76	Unclear legality of creating new exceedances, cannot be justified or offset by reductions 10m away. If air pollution is being caused by the project then those locations should be included in the project, it is unacceptable to ignore adverse effects on human health.  There are some areas which already have exceedances and will be made worse by the project but for unknown reasons have not been declared as AQMA's, this should be done and	The air quality assessment has been undertaken in accordance with DMRB LA105 which presents the methodology to determine whether the impacts on air quality are considered significant. Although the assessment has concluded that there are no significant impacts the Project has investigated whether there are any mitigation measures that could be put in place to reduce the impacts of the scheme on the A228. Unfortunately, National Highways have not been able to reduce the scheme impacts in that area. It should however be noted that we consider that the model could be overestimating the concentrations of NO2 at receptors along the A228. The model indicates that air quality currently exceeds AQS objectives and we have had discussions with the	Environmental Statement Chapter 5 Air quality (Application Document 6.1)  Health Impact Assessment (HIA)	Matter Not Agreed

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		<p>those areas included in the project and to have planned actions to reduce pollution.</p> <p>It has been stated that a greater number of locations will be newly subjected to bad pollution levels than those who may have their air quality levels improved.</p> <p>Greater number of residential locations will be affected badly than reduced.</p>	<p>local authority as part of the assessment process as the area has not been designated an air quality management area and we are not aware of any plans to designate any AQMA on the A228.</p> <p>There will also be a Health Impact Assessment (HIA) with more information specifically on air quality and human health.</p>		
Impact on local woodlands and parks	2.1.77	<p>Pollution will spread further into the parks and Ancient Woodlands, and further up the tree trunks than is presently the case. There is little point having Country Parks which are then so contaminated that their biodiversity is compromised.</p>	<p>Within the Guide for Local Refinement (Chapter 5), National Highways provided an update on how we are assessing nitrogen emitted from vehicle exhausts onto designated habitats (process called nitrogen deposition). The guide identified which designated sites e.g. ancient woodland, veteran trees, Ramsar sites, SSSIs, SPAs and SACs etc.) were likely to be significantly affected by nitrogen deposition; explained the mitigation measures considered and the proposed compensatory habitat areas, which would offset the emissions by planting new habitats</p>	<p>Environmental Statement Chapter 5 Air quality (Application Document 6.1)</p> <p>Environmental Statement Chapter 8 Terrestrial Biodiversity (Application Document 6.1)</p>	Matter Not Agreed

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			and enhance existing sites. Further details on the assessment will be provided in ES Chapter 5 Air Quality and ES Chapter 8 Terrestrial Biodiversity.		
Air quality assessment criteria	2.1.78	Appropriate assessment criteria for rural areas with low property numbers: The significant effect criteria assessment considered number of properties, concluding no risk if very few properties were affected, but with low numbers of properties in rural areas, this artificially downplays the problem. E.g five properties sounds insignificant but there is a great difference in impact between 5/1000 compared to 5/5, i.e if all the properties in a particular low density area are adversely affected.	Air quality modelling has been undertaken at worst-locations/properties where air pollutant concentrations and impacts are expected to be greatest, following the advice of Highways England LA105. All properties considered to be at risk of exceedances of Air Quality Strategy objective thresholds for human health were included in the model. Paragraphs 5.2.88 to 5.3.93 of the Air Quality Environmental Statement describe how the human receptors (such as properties) were selected.	Environmental Statement Chapter 5 Air quality (Application Document 6.1)	Matter Not Agreed
Pollution assessment in	2.1.79	Assessments were made only for opening year but air pollution	The Project air quality monitoring survey has been undertaken over a period of 12 months, other than 2 sites	Environmental Statement Chapter 5 Air quality	Matter Not Agreed

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future years after opening		related to traffic and traffic volumes are predicted to increase, therefore so will pollution. Arguments that more vehicles will be electric are not really quantifiable and predictable, especially for long-distance HGV's and rural residents, and these vehicles will still cause pollution of air, and noise pollution, from tyres and brakes.	where monitoring was undertaken over a period of 8 months. Table 1.1 in Appendix 5.1 Air Quality Methodology outlines the monitoring periods for the project specific monitoring sites. Where the monitoring period was less than 12 months, the data was annualised following DEFRA LAQM TG 16 guidance, in order to ensure the concentrations were representative of long-term average concentrations. The baseline monitoring survey methodology is described in Appendix 5.1 of the Environmental Statement.	(Application Document 6.1)	
Tunnel ventilation system	2.1.80	Concern that particularly bad air will be pushed out of tunnel mouth, without any cleaning, and impact on residential areas due to variable wind direction	The impact of the tunnel portals on receptors such as houses has been assessed and there is no need to add filtration on the tunnel to reduce the effects of pollution from the tunnel.	N/A	Matter Not Agreed
<b>Cultural Heritage</b>					
Impact on ancient buildings	2.1.81	Concern for St Mary's Church, Chalk which is very close to the tunnel mouth and could be affected by increased noise and vibration and	To reduce impacts in Chalk Ward, the southern entrance of the tunnel has been moved, in line with community feedback, further south out of the ward. The tunnel was extended 600 metres after our Options Consultation in 2016 and by an additional 350	N/A	Matter Not Agreed

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		through nearby dewatering.	metres after Statutory Consultation in 2018 lengthening the tunnel by a total of 950 metres and moving it away from Chalk village.		
Access to archaeological findings	2.1.82	Finds should be photographed and available online, exhibited locally not all taken off to a distant University archive.	The Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) (Appendix 6.9, Application Documents 6.3) includes provision for outreach and community engagement. This will be further developed in consultation with heritage stakeholders.	Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) (Appendix 6.9, Application Documents 6.3)	Matter Agreed
<b>Landscape and visual</b>					
Extent of damage to protected land, and “minimisation”	2.1.83	An objective of the project is to minimise adverse impacts on (health and) the environment but the location chosen is one of maximal damage or threats to Ancient Woodland, SSSI’s, SPA’s, Ramsar Site, landscape areas and Shorne Woods Country Park (the most visited park in Kent). “Minimise” is a “weasel word” that should be avoided as e.g. damage that is reduced from	Since the Preferred Route Announcement in 2017, National Highways re-appraised our routing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location. The ‘Need for the Project’ (Doc 7.1) sets out how the identification, selection and design process has responded to the Project Objectives and how a collaborative engagement process has been used to inform the proposed Project. . Reducing the impacts of the Project on the environment is one of the Project requirements (see the Need for the Project, Application Document	Need for the Project (Application Document 7.1)	Matter Not Agreed



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		100% to 99.9% can be said to have been minimised if all possible reduction measures have been applied yet there is no discernible difference.	7.1). At every step of the Project's lifecycle, consideration has been given and efforts have been made to reduce the environmental impacts, while still fulfilling the needs of the Project. The Applicant has followed the mitigation hierarchy of 'avoid, minimise, restore and compensate' to protect the environment in which it would be situated and in keeping with industry best practice.		
Light pollution increase	2.1.84	The area is presently completely dark but will be lit at night causing light pollution for nearby residents and in the landscape, particularly as the screening by trees that we requested has been removed from plans.	National Highways clarified that lighting will be designed, positioned and directed to prevent or minimise light disturbance to nearby residents, ecological receptors, as well as motorists and rail and marine operations. This provision will apply particularly to sites where night working or security lighting will be required.	N/A	Matter Under Discussion
New structures with negative visual impact	2.1.85	75m pylon - In order to get electricity cables across the width of the LTC, an unscreened 75m pylon will be installed with great visual impact. 50msq electricity substation – having given us Chalk Park, actually only in order to	The replacement tower for the modified overhead line, would be visibly softened by proposed planting mitigation. Proposed planting, the creation of Chalk Park and the return of the wider landscape to its former agricultural state would help integrate the new route into the surrounding landscape.	N/A	Matter Under Discussion

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		reduce need for spoil removal, a very large electricity substation was announced within and nearby it which will impinge on local ambience and new views.	The planting would screen views of the new substation.		
Restoration of land post works - quality	2.1.86	The documents state that land will be restored to the satisfaction of the landowner, but it also needs to be to the satisfaction of the Parish and Borough Councils	<p>·</p> <p>National Highways would be required to restore this land to its pre-existing state. The landowner would not need any additional consents from the local planning authority or parish council to keep the land in this state. It is therefore not appropriate for those councils to be required to approve the restoration of the land to this state.</p> <p>It will be restored to the landowner's reasonable satisfaction and compliant with legal requirement.</p>	N/A	Matter Not Agreed
Maximisation of hedges and ponds for biodiversity	2.1.87	In early plans there were plenty of hedges in the compensation land, going back to the original small field landscape of the early 1800's. These then disappeared later with instead a very open landscape proposed	Where possible, reinstatement of historic hedgerows has been designed into the landscape, especially where it has coincided with the boundaries of the project. Examples are the access road from the A226 to the South Portal, which has reinstated historic land and hedgerow planting. Open mosaic habitat is a mixture of open grassland, scrub, bare ground and	Outline Landscape and Ecology Management Plan (Application Document 5.2)	Matter Under Discussion

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		<p>which provides less habitat and screening. Hedges, of mixed native species, should be maximised.</p> <p>Ponds are also important and should be provided where possible and they can be permanent.</p>	<p>ponds. The proposed details for management of this area are included in the Outline Landscape and Ecology Management Plan (OLEMP). The aim is to provide a diverse habitat for biodiversity.</p> <p>There are a number of drainage ponds associated with the project, as well as retention ponds and infiltration basins. These form part of the project's proposed drainage strategy, and their primary function would be to provide drainage attenuation during the operational phase of the Project. Although they would develop into a habitat of benefit to wildlife, they do not form part of the ecological mitigation for the Project. A planned maintenance system would be established to ensure that the drainage system operates effectively.</p> <p>Where waterbodies are lost, these are replaced as part of the ecological mitigation proposals and would be managed with the primary function as a biodiversity resource. New ponds are proposed along the route of the Project, some of which are integral to the mitigation strategy for great crested newts.</p> <p>South of the River Thames, habitat creation would include woodland</p>		

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			planting, to reduce the impact for the loss of ancient and SSSI woodland during the construction of the Project, as well as areas of species-rich grassland, scrub, bare ground and ponds. These are designed to both provide new, high quality habitats as well as connect existing areas of biodiversity value.		
Preservation of existing habitat	2.1.88	Residents are concerned that existing good wildlife habitat may be bulldozed when it might better be incorporated into the plans.	The Project is designed to maximise biodiversity value wherever possible. The biodiversity value generated by the project is described in the terrestrial biodiversity chapter of the Environmental Statement, and set out in detail in Appendix 8.21.	N/A	Matter Not Agreed
<b>Terrestrial biodiversity</b>					
Nitrogen deposition methodology	2.1.89	Quantitative and qualitative means are needed to identify how much compensation and mitigation and NOx offset land is needed, and to confirm it has been provided: It is unclear to us whether or not the acreage of land identified is correct. It is not just area that is important but the	The methodology for identifying suitable areas for nitrogen deposition compensation is listed within the Project Air Quality Action Plan. This sets out why land was included and excluded for further consideration, and why the final sites were identified for inclusion as part of the Project application.  Further details on the assessment will be provided in ES Chapter 5 Air Quality and ES Chapter 8 Terrestrial Biodiversity.	ES Chapter 5 Air Quality and ES Chapter 8 Terrestrial Biodiversity (Application Document 6.1)	Matter Not Agreed

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		<p>degree of ecological enhancement that will occur.</p> <p>It does not make sense to e.g. take existing grazing land, relabel it as mixed mosaic grassland and then claim it to be compensation land for the LTC. That area already existed and the ecological enhancement is small.</p>			
<p>Permanence of compensation and mitigation and NOx offset land, safeguarding against future development</p>	<p>2.1.90</p>	<p>If land is taken for compensation and mitigation and NOx offset then this must be permanent.</p> <p>Great concerns that if management of the land is vested in local authorities (GBC and KCC) it might later be magically declared redundant and sacrificed for development, against the original principles of its acquisition.</p>	<p>National Highways will be responsible for long term management and maintenance of environmental mitigation unless it is agreed with a third party (usually another statutory body, such as Natural England, Forestry England, etc) for them to manage at a later date.</p> <p>National Highways won't apply for planning consent for change of use of those environmental mitigation areas as the deviation from what is secured in the Development Consent Order would be a criminal breach of control for National Highway</p> <p>Any future development outside the land required to construct, operate and maintain the Project would be</p>	<p>N/A</p>	<p>Matter Under Discussion</p>

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			<p>decided by the relevant local planning authority or other relevant approval body. For more information about local authority aspirations for future development, refer to their relevant local plans.</p>		
<b>Marine biodiversity</b>					
Contaminated water discharges into the Thames	2.1.91	<p>Construction phase - Plans have variously included a construction water outflow along the “Ramsar Ditch” (part of the Ramsar Site), into the North Kent Marshes SPA and out into the Thames – detail of this remains vague.</p> <p>Operational phase – Remains unclear where drainage of contaminated water from the road and tunnel will be pumped from and to, and whether there will be any discharge into the Thames, and of what quality of water. As the Thames is tidal here, contamination can hang</p>	<p>For the construction phase, it is proposed to discharge water to a ditch located north of Lower Higham Road. The quantity and quality of this discharge would be subject to regulation by the Environment Agency through an environmental permit. In line with current legislation, the Project would be required to meet the water quality and discharge volume conditions stipulated by the environmental permit.</p> <p>During operation it is not proposed to discharge any project drainage directly into the Ramsar site or SPA. Operational drainage comprises a mixture of infiltration to ground and attenuated, treated discharges to surface watercourses. An assessment of the operational drainage proposals has been completed and is presented within the Environmental Statement (Application Document 6.1). This includes an assessment of the</p>	N/A	Matter Under Discussion

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		around for significant time.	potential effects on surface and groundwater quality and levels. The Tunnel will have an integrated drainage system which will ensure the collection and treatment of tunnel drainage prior to discharge into the River Thames under high tide conditions. In line with current legislation, this discharge would be subject to an environmental permit.		
<b>Noise and Vibration</b>					
Mitigation measures for noise and vibration	2.1.92	Discussion needed about what protective measures will be put in place, when and where to maximally protect the local residents, which should be of most importance.	National Highways has sought to reduce its impact on local community during its construction phase. Mitigation measures are included in the CoCP (REAC) to minimise the potential effects of dust, noise, and light impacts.  Environmental Statement Chapter 12 Noise and Vibration includes noise and visual assessments from construction activities including working hours from several perspectives (e.g. noise) which has informed mitigation measures such as the use of bunds and fences where appropriate to lessen the impact of these activities to residential housing.	Environmental Statement Chapter 12 Noise and Vibration (Application Document 6.1)	Matter Not Agreed
Design changes	2.1.93	Inexplicable changes to noise barriers, e.g. barrier at Park Pale	There is no requirement for a noise barrier in this location as a result of the existing A2 upgrade/widening	N/A	Matter Not Agreed

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
		<p>apparently removed at suggestion of the AONB for visual impact reasons that seem minor and wrong having regard to the removal of the central reservation trees which is also occurring. This barrier is anyway needed to mutually screen headlights so must be reinstated.</p>	<p>implementing a low noise surface compared to the existing Hot Rolled Asphalt surface. By introducing a higher standard of low noise road surfacing we are able to remove one of the previously proposed noise barriers, which will lead to a reduction in the visual impact of the proposals in that area. This change responds to feedback received from Kent Downs AONB Unit (a statutory consultee) about the visual impact of the noise barrier near Park Pale bridge. A barrier is also not needed for visual screening because design refinements have made it possible to retain more trees between Park Pale and the A2 corridor.</p>		
<p>Impact on recreational routes and Shorne Woods Country Park</p>	<p>2.1.94</p>	<p>Area and recreational facility currently valued for tranquillity will become subject to greatly increased traffic noise.</p>	<p>During the community impacts consultation, National Highways presented information about the predicted impacts of the new road on visual amenity and landscape. National Highways outlined how we have sought to reduce these through good design and measures such as landscaping, planting and false cuttings to screen views of the new road and traffic. Areas used temporarily for construction would be restored to their former use. The visual impacts of the project would be</p>	<p>Environmental Statement chapter 12: Noise and Vibration (Application Document 6.1)</p>	<p>Matter Not Agreed</p>



Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
			controlled through the good practice measures set out in the CoCP and REAC. Environmental Statement chapter 12: Noise and Vibration will present a full assessment of noise and vibration		
Impact on residential properties and recreational areas close to the Project	2.1.95	Noise contours were only published in July 2021 and showed that residential properties and recreational areas, including the new Chalk Park, will be badly affected by noise from the Project.	Environmental Statement chapter 12: Noise and Vibration will present a full assessment of noise and vibration.	Environmental Statement chapter 12: Noise and Vibration (Application Document 6.1)	Matter Not Agreed
Data validity	2.1.96	Background noise levels quoted appear too high, aware additional readings are now being taken.	Environmental Statement chapter 12: Noise and Vibration will present a full assessment of noise and vibration.	Environmental Statement chapter 12: Noise and Vibration (Application Document 6.1)	Matter Not Agreed
<b>Population and human health</b>					
Loss of golf course	2.1.97	A very popular golf course, the only “pay and play” type for a considerable distance, is being lost. In fact it has now already closed pending sale of the land (SPC assume to NH) but given the time to	National Highways propose to permanently acquire the site for the new road and for landscaping. National Highways are not proposing to replace the golf club. Instead, National Highways propose to create a new parkland area on part of the site that would be open to the public after construction.	Environmental Impact Assessment Chapter 13 Population and Human Health (Application Document 6.1)	Matter Under Discussion

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
		start of construction it could and should have remained open.	National Highways have assessed the impacts of the Project on the Southern Valley Golf Course (SVGC) as a community asset. This will be covered by the Environmental Impact Assessment within our DCO application		
Multi-user paths safety	2.1.98	The Project wants to provide multi-user paths but horses can churn up surfaces making them impassable in wetter months, and cyclists and horses with pedestrians are a poor safety mix. Where there are multi-user routes they should have separated areas for safety reasons.	The proposed Walking, cycling and Horse riding (WCH) strategy has been developed to the latest DMRB standards and taking into account guidance within the LTN 1/20 Cycle Infrastructure Design. The proposed WCH routes will be developed at detailed design using these standards, which are outlined within the Design Principles, to determine suitable widths, separation and surface requirements.  The WCH provision in the Project is set out in application documents, specifically the Rights of Way & Access Plans (2.7) and Schedule 5 of the draft DCO (3.1). Further information on the provision is set out in the Project Design Report (7.4).	Project Design Report (Application Document 7.4) Rights of Way & Access Plans (Application Document 2.7) Schedule 5 of the draft DCO (Application Document 3.1)	Matter Under Discussion

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
Connectivity of paths	2.1.99	<p>Especially with recent expansion of land take for NOx offset, there should be creation of continuous longer distance paths that connect up communities.</p> <p>Some of the paths residents use are former woodsman's tracks for coppicing, although shown on maps these are not public footpaths but need to be made so, with this being enabled as part of the project. SPC particularly mention Court Wood and Great Crabbles Wood in this context.</p>	<p>A WCH Strategy has been developed to help improve connectivity to the existing PRoW network and repair any severance caused directly by the Project. The strategy has been developed through dialogue with Stakeholders and through a series of formal consultations to identify where proposed improvements should be provided. For those wider areas not directly impacted by the Project, there are opportunities for Designated Funding from National Highways to be assigned as part of a legacy package of works.</p> <p>The WCH provision in the Project is set out in application documents, specifically the Rights of Way &amp; Access Plans (2.7) and Schedule 5 of the draft DCO (3.1). Further information on the provision is set out in the Project Design Report (7.4).</p>	<p>Project Design Report (Application Document 7.4)</p> <p>Rights of Way &amp; Access Plans (Application Document 2.7)</p> <p>Schedule 5 of the draft DCO (Application Document 3.1)</p>	Matter Not Agreed
Non-motorised users enabled to use the crossing	2.1.100	<p>There need to be bus routes that connect Kent and Essex.</p> <p>There have been requests for shuttle buses to assist cyclists to cross, they are expected to use the</p>	<p>The new road creates opportunities for operators to develop new local and regional bus services, by providing new connectivity between Kent, Thurrock and Essex. Identification and development of these routes is the responsibility of the relevant operators. Local buses will not have to pay the user charge for the Lower</p>	N/A	Matter Under Discussion

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
		Gravesend to Tilbury ferry.	<p>Thames Crossing, reducing operating costs for operators.</p> <p>National Highways considered options during the development of the project to provide improved river crossings for walkers and cyclists. The options investigated include using the tunnel, upgrading the existing ferry, relocating the ferry, building a separate bridge or cable car, and providing a shuttle service through the tunnel. All of these options have been rejected for reasons including lack of technical feasibility, operational issues, lack of commercial viability, cost, environmental impacts and poor safety. Latent demand for walking and cycling across the River Thames at the project crossing point is low and therefore unlikely to unlock enough trips to make the required infrastructure for a shuttle service economically viable. In addition, journey times and distances for a shuttle would be excessive because the most suitable collection and drop-off points would be at the proposed M2/A2 junction and as far north as the proposed A13/A1089 junction.</p> <p>There is no provision for cyclists. The Lower Thames Crossing has been designed to provide a free-flow,</p>		

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
			connection between the A2 and M25 with a maximum speed of 70mph. National Highways are working closely with communities and Local Authorities on ensuring there is minimal impact on roads. National Highways will investigate the provision of temporary/permanent alternative footpaths, bridleways and cycle paths for users where the new crossing will impact on existing routes.		
<b>Road drainage and the water environment</b>					
Drainage and storage proposals	2.1.101	Adequacy of proposals for drainage and storage: Drainage ponds near A226 have been amalgamated with those further south, how will water from more northerly road surfaces get to there, location and landscaping of pumps, failsafes/backup.  Ponds need capacity for heaviest incidence of rainfall, which can be torrential, not yearly average.  Reassurance needed that capacity is suitable	Operational drainage discharges to ground have been subject to water quality modelling assessments that demonstrate no risks of pollution of underlying groundwater resources. A temporary discharge of rainfall runoff is also proposed and this will be governed by the parameters of an Environment Agency discharge permit that will secure the required water quality standards.	N/A	Matter Not Agreed

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
		for the vast areas of tarmac being created, especially the 2km long slope of the LTC. Risk of flooding to houses on the A226 and contamination to North Kent Marshes SPA should there be overspill <sup>101</sup>			
Biodiversity value of drainage ponds	2.1.102	It is hoped that the lower parts (least contaminated?) of the pond series might have some biodiversity/habitat qualities.	The drainage design incorporates Sustainable Drainage Systems (SuDS) and reduces the risk of causing flooding elsewhere by using attenuation features as presented on Figure 2.4: Environmental Masterplan (Application Document 6.2) Drainage of operational areas on greenfield sites would be designed to ensure that post-development surface water runoff rates do not exceed existing rates. Where this attenuation is provided via ponds, the ponds would be designed to appear as naturalistic elements within the wider setting, with planting provided to soften edges where this is appropriate.	Figure 2.4: Environmental Masterplan (Application Document 6.1)	Matter Under Discussion
Contamination of North Kent Marshes SPA	2.1.103	Proposals include using a present arable field north of the Lower Higham Road as a	The three arable fields north of Lower Higham Road are only required for temporary use as per the land use plans. During the period of temporary	N/A	Matter Under Discussion

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
		<p>“temporary” drainage area during construction, this field is bounded on its west by the “Ramsar Ditch” which is part of the Ramsar Site. Assurance is needed that contaminated water cannot enter the interconnected marshes supply and drainage system.</p> <p>Note that construction plans also include using the Ramsar Ditch for drainage outflow to the Thames, detail of how this would be effected are lacking.</p>	<p>use, the fields will be farmed in such a way as to ensure winter stubble remains so it can be used for birds.</p> <p>The new drainage pipes are to convey temporary surface water discharges (suitably treated by a settlement lagoon) and not required permanently. The temporary drainage outfall would only be in place during the construction period. Permanent subsurface rights are sought for the stretch of the pipe running underneath Lower Higham Road to the field to allow for the redundant pipe to be decommissioned and left in situ should its removal not be practical or economical. If the pipe is left in situ measures would be taken to ensure it is appropriately capped.</p> <p>The discharge of runoff from the Southern tunnel entrance compound would be governed by an Environment Agency Discharge Consent, the conditions of which the contractor would be bound to comply with. This will safeguard against contamination entering the Ramsar site. Protocols to prevent pollution during extreme weather events would also be put in place and would be documented in the detailed Construction Environment Management Plan.</p>		

Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
Water flow from Shorne Ifield Farm to west of Chalk Church	2.1.104	SPC have asked repeatedly about this because a map issued early on included a water flow route supplying the marshes that would be transected by the works. SPC have been told that there isn't a pipe identified but we had not been thinking it was necessarily culverted. Verbal information via Gravesham Borough Council is that according to Natural England it is a mapping error but we would like more detailed, written assurances over lack of existence and what route this waterflow actually takes.	National Highways have undertaken extensive searches to find more information about this watercourse, including with the land owner/land agent, the EA and the LLFA and no records of it have been found. No evidence of its presence has been identified during site walkovers. It is concluded that no culverted watercourse exists in the alignment shown in the early project maps.	N/A	Matter Under Discussion
Effect on existing ponds/lakes	2.1.105	There are, or should be existing lakes and ponds locally, concern that these could have their water supply, or water retention ability, compromised.	The Environmental Statement (Application Document 6.1) includes an assessment of likely significant effects on both surface and groundwater receptors, including effects on water flows, levels and quality.	Environmental Statement (Application Document 6.1)	Matter Under Discussion



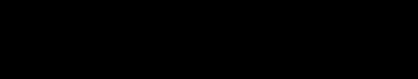
Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
Chemical de-icing increasing contaminated run-off	2.1.106	The new 2km long incline up from the marshes, and the junctions and additional feeder roads, will need a significant amount of chemical de-icing in winter, this increases the amount of contaminated run-off and increase threat to the marshes. Heated road surfaces were suggested as a possible reduction measure.	An assessment of the potential effects of the operational drainage systems on surface and groundwater receptors has been carried out and is presented within the Environmental Statement (Application Document 6.1). Appropriate mitigation has been detailed within the drainage design to ensure effects are minimised.	Environmental Statement (Application Document 6.1)	Matter Under Discussion
<b>Climate</b>					
Effect of climate change on the project	2.1.107	Documentation discussed effect of the project on climate change but not the reverse, i.e. how climate change might affect and threaten the project.	To ensure the effects of climate change are minimised during operation, the project would be designed in accordance with the standards set out in Highways England's Design Manual for Roads and Bridges. Construction materials and products would be selected that are more resilient to the effects of projected future climate change. The road and any associated assets would be maintained to ensure that any deterioration and/or defects would be identified and managed as quickly as possible.  More information is provided in the Environmental Statement Appendix	Environmental Statement Appendix 15.3 - Climate Resilience Impacts and Effects	Matter Under Discussion

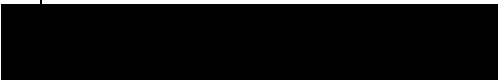
Topic	Item number	Shorne Parish Council comment	National Highways comment	Document Reference	Status
			15.3 - Climate Resilience Impacts and Effects		
Enhancement of flood defences	2.1.108	Documentation discussed this early on but it disappeared from later versions, reasons unclear. Project must not increase the threat to low lying areas.	During construction and operation, flood defences will be monitored to ensure structure stability. Remedial action will be taken if necessary to maintain the defences. The project design includes flood resilience and this design includes amendments necessary due to predicted climate change.		Matter Agreed

### 3 Agreement on this Statement of Common Ground

#### STATEMENT OF COMMON GROUND

**This Statement of Common Ground has been prepared and agreed by (1) National Highways Company Limited and (2) Shorne Parish Council.**

Name	Eva Simunovic
Position	Stakeholder Manager
Organisation	National Highways
Signature	

Name	Susan Lindley
Position	Chair of Planning and Highways Committee
Organisation	Shorne Parish Council
Signature	

## Appendix A Documents considered within this Statement of Common Ground

- A.1.1 A summary of the documents which have been considered in the development on this SoCG outside of the DCO application documents are provided below.
- a. Shorne Parish Council formal representations concerning a proposed new Lower Thames Crossing east of the Dartford Crossing:
    - i. May 2013 Options for a New Lower Thames Crossing
    - ii. March 2016 Route Consultation
    - iii. November 2017 Scoping Opinion
    - iv. October 2018 Statutory Consultation
    - v. March 2020 Supplementary Consultation
    - vi. July 2020 Design Refinement Consultation
    - vii. July 2021 Community Impacts Consultation
    - viii. May 2022 Local Refinement Consultation

### **SoCG iterative process:**

On-line meetings were held between SPC and National Highways to discuss points that SPC had raised during consultations. These discussions provided useful and sometimes additional information that answered many questions however some also remained unanswered or the answer did not always fully relate to the point being made.

This SoCG summarises points that remain as of 14<sup>th</sup> October 2022.

## Appendix B Glossary

Term	Abbreviation	Explanation
Area of Outstanding Natural Beauty	AONB	Area of Outstanding Natural Beauty
Code of Construction Practice	CoCP	Contains control measures and standards to be implemented by the Project, including those to avoid or reduce environmental effects.
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.
High Speed 1	HS1	A 109km high-speed railway between London and the UK end of the Channel Tunnel. The line carries international passenger traffic between the UK and continental Europe; it also carries domestic passenger traffic to and from stations in Kent and east London, as well as Berne gauge freight traffic.
Lower Thames Project	LTC	The proposed A122 Lower Thames Crossing.
Outline Traffic Management Plan for construction	oTMPfc	Outlines the approach to carrying out temporary traffic management for the safe construction of the project and the management measures to reduce the impact on local communities.
Transport Analysis Guidance	TAG	National guidance document produced by the Department for Transport.
Ramsar	Ramsar	A wetland of international importance, designated under the Ramsar convention
Register of Environmental Actions and Commitments	REAC	The REAC 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).
Special Area of Conservation	SAC	SACs are to protect the 220 habitats and approximately 1000 species listed in annex I and II of the directive which are considered to be of European interest following criteria given in the directive.
Site of Special Scientific Interest	SSSI	A conservation designation denoting an area of particular ecological or geological importance.
Special Protection Area	SPA	A designation under the European Union Directive on the Conservation of Wild Birds.

<b>Term</b>	<b>Abbreviation</b>	<b>Explanation</b>
Walkers, cyclists and horse riders	WCH	Walkers, cyclists and horse riders.
Wider Network Impacts Management and Monitoring Plan	WNIMMP	Summarises the work undertaken to date to identify and assess areas of the road network where monitoring and potential interventions may be necessary to better manage additional traffic as a result of the project

## 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 consultation undertaken between (1) National Highways and (2) Shorne Parish Council in relation to the matters addressed in this SoCG.

**Table C.1 Engagement activities between National Highways and Shorne Parish Council.**

Date	Form of contact/ correspondence	Key topics discussed and key outcomes
13/07/2022	Meeting	To review and progress with SoCG issues
10/03/2022	Meeting	To provide an overview on LTC Nitrogen Deposition proposals
18/05/2021	Meeting	To discuss LTC legacy and benefits plans
28/04/2021	Meeting	To discuss and review NMU SoCG issues
08/04/2021	Meeting	To discuss and review landscape and green infrastructure SoCG issues
25/03/2021	Meeting	To discuss and review cultural heritage SoCG issues
02/03/2021	Meeting	To discuss and review utilities and biodiversity SoCG issues
16/02/2021	Meeting	To discuss and review Highways design and alignment SoCG issues
29/07/2020	Meeting	To provide an overview of LTC Design Refinements Consultation changes south of the river
20/02/2020	Meeting	To provide an overview of LTC Supplementary Consultation changes south of the river

- C.1.3 In addition to the meetings listed in Table C.1, there has been ongoing regular engagement between (1) National Highways and (2) Shorne Parish Council since the preferred route announcement (PRA) in 2017. This includes project update meetings, Shorne Parish Council attendance at consultation events (including previews), information sessions, mobile information centres (in Shorne village), community events, as well as numerous telephone calls and email updates on all project developments and survey works.

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