

Lower Thames Crossing

5.4.4.6 Statement of Common Ground between (1) National Highways and (2) Gravesham Borough Council

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

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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 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 matters that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared in respect of the Project by (1) National Highways, and (2) Gravesham Borough 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 Gravesham Borough Council is a host authority in respect of the application and as such is a category 'B' local authority under section 43 of the Planning Act 2008. As a borough council, it is the local planning authority and holds responsibilities including developing and implementing a Local Plan, waste management, community and environmental issues within its boundary.

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.

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

2 Matters

2.1 Matters agreed, not agreed or under discussion

- 2.1.1 Table 2.1 details the matters which have been agreed, not agreed, or are under discussion between (1) National Highways and (2) Gravesham Borough 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.
- 2.1.3 The numbers in [x] in the ‘Item Number’ column below correspond with the numbering of the matters as they were recorded in an issues tracker developed between National Highways and Gravesham Borough Council during the Project’s various pre-application phase, and these matters have either been paraphrased or amalgamated, and in most occurrences, both. This was done for the purposes of clarity and brevity. The reference remains to help relate these matters back to their original source.

Table 2.1 Matters

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
DCO and Consents					
Discharging Requirements	2.1.1 [GRAVESHAM-#0551]	Gravesham Borough Council considers that DfT is not necessarily the appropriate body for discharging Requirements, and this should be locally considered, with the organisation being dependent on the topic involved.	National Highways maintains that the most appropriate discharging authority for the Project is the Secretary of State.	N/A	Matter Not Agreed
Need for the Project					
Need for Traffic Relief	2.1.2	Gravesham Borough Council recognise that there	National Highways agree that there is a general need to put in	N/A	Matter Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		is a general need to put in place measures to reduce congestion on the network and increase cross-river capacity, notwithstanding areas of disagreement on the location, scale and design of National Highways proposals for the Project covered elsewhere in this table.	place measures to reduce congestion on the network and increase cross-river capacity, notwithstanding areas of disagreement on the location, scale and design of National Highways proposals for the Project covered elsewhere in this table.		
Principle of Development – Key Objectives	2.1.3 [GRAVESHAM-#0003]	Gravesham Borough Council does not agree that the proposed Project would support local economic growth in Gravesham and reduce congestion at Dartford in the long term.	National Highways considers that the Transport Assessment shows that there would be an improvement to the situation at the Dartford Crossing, and as outlined in Table A34 and Plate A15 of Appendix D of the Combined Modelling and Appraisal Report (ComMA) (Oct 2020 version) (7.7), the Project would support local economic growth and Gravesham would be the second largest beneficiary of the monetised benefits of the Project. This position has been updated for the submission version of the ComMA and the matter remains under discussion subject to Gravesham Borough	Combined Modelling and Appraisal Report (ComMA) (Oct 2020 version) (7.7)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			Council's review of the submission version.		
Planning Statement/Policy					
Green Belt – Inappropriate Development in the Green Belt	2.1.4 [GRAVESHAM-#0116] [GRAVESHAM-#0117] [GRAVESHAM-#0118] [GRAVESHAM-#0119] [GRAVESHAM-#0178] [GRAVESHAM-#0557] [GRAVESHAM-#0897] [GRAVESHAM-#0898] [GRAVESHAM-#0945]	Gravesham Borough Council's view is that the Project will comprise 'inappropriate development' within the Green Belt, requiring the demonstration of 'very special circumstances' that clearly outweigh both definitional and actual harm when compared to such alternatives.	National Highways agrees that the Project comprises inappropriate development within the Green Belt, and as such requires the need to demonstrate Very Special Circumstances, and this is set out within the Planning Statement Appendix E (7.2).	Planning Statement Appendix E (7.2)	Matter Agreed
Green Belt – Very Special Circumstances	2.1.5	Gravesham Borough Council is concerned that the Project does not meet the test of demonstrating Very Special Circumstances for	National Highways is content that the implications of the Project on Green Belt in policy terms have been considered appropriately in the Planning Statement (Application Document 7.2) and that the	Planning Statement (7.2) ES Chapter 7 (6.1)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		<p>development in the Green Belt.</p> <p>Gravesham Borough Council is concerned that effects on Green Belt are considered as a policy issue, rather than a landscape issue.</p>	<p>Project demonstrates Very Special Circumstances that clearly outweigh both definitional and actual harm when compared to such alternatives.</p> <p>The Planning Statement addresses the effects of the Project on the Green Belt from a policy perspective.</p> <p>The Environmental Statement (ES) Chapter 7 (6.1) considers the effects of the Project on the landscape including relevant landscape designations.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application materials referenced.</p>		
Route selection, modal alternatives & assessment of reasonable alternatives					
Development in this alignment/location and general approach to consideration of reasonable alternatives	2.1.6 [GRAVESHAM-#0001] [GRAVESHAM-#0037] [GRAVESHAM-#0050] [GRAVESHAM-#0051]	<p>Gravesham Borough Council does not agree that the preferred route selection (east of Gravesend) is appropriate.</p> <p>Gravesham Borough Council does not agree that sufficient work has been carried out to consider</p>	<p>National Highways does not agree that the route selection is inappropriate and is comfortable that the selection process and consideration of alternatives has been robust with regard to the points raised by Gravesham Borough Council.</p>	ES Chapter 3 (6.1) Planning Statement (7.2) The Need for the Project (7.1)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
	<p>[GRAVESHAM-#0053] [GRAVESHAM-#0054] [GRAVESHAM-#0239] [GRAVESHAM-#0274] [GRAVESHAM-#0275] [GRAVESHAM-#0278] [GRAVESHAM-#0328] [GRAVESHAM-#0556] [GRAVESHAM-#0919]</p>	<p>reasonable alternatives, citing:</p> <ul style="list-style-type: none"> - The assessment of environmental effects of alternatives routes is lacking (including HRA, historic environment and landscape) - WebTag is too limited in its consideration of qualitative issues not capable of being monetised - Green Belt has not been considered as a policy constraint - The approach to BCR is too limited - Given the amount of time that has passed since the options appraisal, the option selected may no longer be considered the most appropriate <p>Gravesham Borough Council consider that the approach to Scoping, Preliminary Environmental Information Report (PEIR), Supplementary</p>	<p>This is set out in Chapter 3 of the ES (Assessment of Reasonable Alternatives) (6.1). The Planning Statement (7.2) will provide evidence to address the alternatives considered and demonstrate the accordence of these works with the relevant National Policy Statement. More information is available in Application Document 7.1 (The Need for the Project). This matter remains under discussion subject to review of application materials.</p>		

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		<p>Consultation and evolution of the Project through design review via consultation is inadequate.</p>			
<p>Alternative Design Parameters and Modes</p>	<p>2.1.7 [GRAVESHAM-#0054] [GRAVESHAM-#0055]</p>	<p>Gravesham Borough Council consider that insufficient consideration of design parameter alternatives (e.g. reducing design speed) or opportunities to support other transport modes (to address any existing severance issues that act as a barrier to non-motorised users) has been undertaken in determining the preferred option.</p>	<p>National Highways consider that reasonable alternatives and opportunities have been considered and assessed appropriately.</p> <p>This is set out in Chapter 3 of the ES (Assessment of Reasonable Alternatives) (6.1) and refers to Department for Transport (DfT) studies in 2009 and 2012, options identification and selection process in 2014, and design evolution thought six years of public consultation and engagement.</p> <p>Severance impacts were considered as the project evaluated the performance of options and alternatives and assessed for the preferred option in Chapter 13 (Population and Health) of the ES (6.1).</p> <p>The Planning Statement demonstrates accordance with National Planning Statement policy (7.2).</p>	<p>ES Chapter 3 (6.1) Planning Statement (7.2) ES Chapter 13 (6.1)</p>	<p>Matter Under Discussion</p>

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			This matter remains under discussion subject to Gravesham Borough Council's review of referenced application documents.		
Alternatives	2.1.8 [GRAVESHAM-#0002] [GRAVESHAM-#0404] [GRAVESHAM-#0405]	Gravesham Borough Council consider that insufficient information has been provided about what alternatives have been considered, how they have been considered and against what data, and therefore whether they reflect the realistic 'worst case' for environmental effects.	It is not agreed that insufficient information has been provided about what alternatives have been considered, how they have been considered and against what data, and therefore whether they reflect the realistic 'worst case' for environmental effects. National Highways note that the Planning Statement (7.2) will include a section on project evolution that will set out the chronology of the options, alternatives and how the pre-application process has influenced the DCO application and project design. Additionally, the ES Chapter 3 (6.1) will provide detailed information regarding the assessment and selection of the proposed route, reporting on the alternatives and options considered. Environmental assessment, Consultations and engagement	Planning Statement (7.2) ES Chapter 3 (6.1)	Matter Not Agreed

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			with stakeholders have informed the identification of the proposed road design.		
Opportunities to reduce car use	2.1.9 [GRAVESHAM-#0564] [GRAVESHAM-#0846]	Gravesham Borough Council is concerned that there is a lack of consideration of non-car travel as part of the Projects proposals.	<p>National Highways is proposing to either upgrade or provide new Walking, Cycling and Horse-riding (WCH) routes across the route, providing almost 3km for every 1km of new road.</p> <p>The whole of the Project route is accessible to local and longer distance public transport routes, if operators choose to make use of it.</p> <p>The Project would improve journey time reliability and journey times at the Dartford Crossing, providing potential further improvements to public transport.</p> <p>National Highways has also set up a Sustainable Transport Working Group involving local authority stakeholders to investigate sustainable travel and cross-river connectivity enhancements that could be delivered in future to complement the Project. The Group has proposed several local priorities and opportunities</p>	Rights of Way & Access Plans (2.7) Environmental Masterplan (6.2) ES Chapter 13 (6.1)	Matter Under Discussion

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			<p>for feasibility studies for future funding applications (as stated in the Sustainable Transport Complementary Measures report of March 2021) for Designated Funds.</p> <p>This remains a matter under discussion subject to Gravesham Borough Council review of National Highways' position which will be set out within the Rights of Way & Access Plans (2.7), Environmental Masterplan (ES Figure 2.4) (6.2) and ES Chapter 13 (6.1) and without prejudice to separate issues around cross-river WCH.</p>		
Consultation and Engagement					
Adequacy of Consultation	2.1.10 [GRAVESHAM-#0233]	Gravesham Borough Council considers that National Highways has failed to comply with legislative requirements on consultation and the commitment it made within the published Statement of Community Consultation (SoCC), and considers that the PEIR was inadequate	<p>National Highways is content that the project has complied with legislative requirements on consultation and the commitment it made within the published Statement of Community Consultation (SoCC).</p> <p>Considerable care was taken to ensure the consultation materials were clear and understandable, provided an</p>	Statement of Community Consultation ES (6.1)	Matter Under Discussion

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		<p>and that this has not been rectified.</p>	<p>appropriate level of detail, and were suitable for both technical and non-technical audiences and followed accessibility guidelines.</p> <p>Rigorous measures were put in place to ensure the information sent to consultees, including notification letters to people with an interest in land, were accurate and timely.</p> <p>National Highways considers that the PEIR published at Statutory Consultation provided environmental information to allow consultees to take an informed view of the Project and provide their consultation feedback, and that National Highways followed the relevant regulations, paid attention to guidance notes and industry best practice and, where appropriate, involved relevant stakeholders in the development of the PEIR.</p> <p>The PEIR was produced to include the environmental topics in line with the scoping report and the approach to the Environmental Impact</p>		

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			<p>Assessment (EIA) was updated to reflect the Scoping Opinion. For the Design Refinement Consultation, the Applicant published a 208-page Environmental Impacts Update (EIU) document setting out how the proposals affected the environmental assessments provided in the PEIR.</p> <p>National Highways first provided information on the air quality and noise impacts of the Project at Statutory Consultation. At each consultation the Environmental Update document set out the proposed changes to the project, and confirmed the validity of the previously consulted information. Following the submission and withdrawal of the DCO application in late 2020, the full Environmental Statement as then drafted was provided to Gravesham Borough Council. During the Community Impacts Consultation this information was set out on a localised basis in the ward summaries, then during the Local Refinement</p>		

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			<p>Consultation the Guide to the Local Refinements Consultation document set out the proposed changes to the project, and again confirmed the validity of this information previously released. National Highways maintain that the information provided on both air and noise impacts, during both public consultation and engagement, has been sufficient to understand the Project-wide and localised impacts of our proposals, and to determine the suitability of the mitigation. During the consultation and engagement over the past few years, local authorities including Gravesham Borough Council have made a number of recommendations for additional mitigation, such as low noise surfacing, increased bunding, and National Highways has incorporated these recommendations into our proposals.</p> <p>National Highways will brief the relevant authorities, including Thurrock Council, on the findings of the finalised noise & air quality assessments prior to</p>		

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			<p>the submission of the DCO application. Thurrock Council will then have opportunity to make further representation through the Local Impact Reports.</p> <p>Further assessments and the development of proposals to reduce environmental effects are reported in the ES (6.1), which is also informed by the Project's consideration of consultation responses, and further survey and design work.</p> <p>National Highways considers this a matter under discussion pending receipt of Gravesham Borough Council's position which will be set out within the Adequacy of Consultation Report.</p>		
Information Shared during Engagement	2.1.11 [GRAVESHAM-#0236]	Gravesham Borough Council raised concern at Supplementary Consultation about the status of information supplied at engagement meetings, when a response is required, and how such feedback is considered by the project team.	<p>National Highways considers that this feedback has been proactively addressed through the establishment of a fresh issue engagement and resolution process.</p> <p>On individual issues, technical specialists are demonstrating to Gravesham how feedback has been considered by the project team, working towards an</p>	N/A	Matter Agreed

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			<p>agreed position (either agree or disagree) for the benefit of the Statement of Common Ground.</p> <p>Actions are captured in regular meeting notes.</p> <p>It is agreed that feedback and the clarity of the status of information has improved.</p>		
Visualisation of A2/LTC Junction	2.1.12 [GRAVESHAM-#0981]	Gravesham Borough Council consider that consultation materials have failed to show the size, height and mass of the A2/LTC junction and associated road infrastructure, from the users' viewpoints.	<p>This is noted and National Highways will provide Gravesham Borough Council (and other interested stakeholders) with an appropriate cross-section showing the size, height and mass of the A2/LTC junction and associated road infrastructure.</p> <p>Further visual materials will be set out within the application documents, particularly the Project Design Report (7.4) and Chapter 6 of the ES (Landscape and Visual) (6.1).</p>	Project Design Report (7.4) ES Chapter 7 (6.1)	Matter Under Discussion
Land and Compulsory Acquisition					
Viability of Land Holdings (Re-instatement)	2.1.13 [GRAVESHAM-#0661] [GRAVESHAM-#0752]	Gravesham Borough Council is concerned that where land is temporarily acquired, there is a requirement to reinstate historic boundaries and	National Highways note that the draft DCO (3.1) obliges National Highways to return temporary land to the reasonable satisfaction of the landowner.	ES Chapter 13 (6.1) Draft Development Consent Order (DCO) (3.1)	Matter Under Discussion

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	[GRAVESHAM-#0906]	<p>ensure returned land is viable in terms of its previous use.</p> <p>Gravesham Borough Council is concerned that land between Chalk Park, LTC, A227 and Thong Lane is subject to land raising but then returned to the landowner, and may not be viable for farming given that it will now be detached from other farmed land.</p>	<p>Therefore, reinstatement will be agreed with landowners following use by the Project.</p> <p>Landowner losses as a result of the Project's temporary occupation will be payable in line with the Compensation Code.</p> <p>National Highways recognises that Gravesham Borough Council's concern relates to land-use viability in its existing use, rather than landowner compensation.</p> <p>Effects on the agricultural economy and land use are considered within Chapter 13 of the ES (6.3) and This matter remains under discussion pending Gravesham Borough Council's review of this and other relevant application materials.</p>		
Landscape Maintenance	2.1.14 [GRAVESHAM-#0809]	Gravesham Borough Council consider that planting establishment period should start from the date of planting (i.e. not the date the site was returned from its previous temporary	It is agreed that planting establishment period should start from the date of planting National Highways can confirm that is the intention and is set out in draft commitment LV003 included in the Register of Environmental Actions and	Register of Environmental Actions and Commitments (REAC) (6.3)	Matter Under Discussion

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		use) to allow for full period of establishment.	Commitments (REAC) (6.3) and as shared in the July 2021 community impacts consultation. This matter remains under discussion subject to Gravesham Borough Council's review of the REAC.		
Design – Road, Tunnels, Utilities					
Chalk Park (Design)	2.1.15 [GRAVESHAM-#0776] [GRAVESHAM-#0974]	Gravesham Borough Council consider that the design of Chalk Park needs to be explored further (than set out in 2021's Community Impact Consultation) in terms of the height of landforms, their visual effects on the landscape, and the ability for the park to offer real amenity benefits to the local community. Gravesham Borough Council notes that some screening of works and project infrastructure may be desirable for residents to the west of the Project.	National Highways consider that - as explained in the Design Principles (Principle S3.04) (7.5) the intention is to create a wooded hilltop, characteristic of the setting of nearby settlements at Thong and Shorne, to soften the exposed urban edge of Gravesend. The raised land will also capitalise on outward views over the Thames Estuary, a key characteristic of the Higham Arable Farmland local landscape character area. The maximum height of the proposed land raising at Chalk Park would be 15 metres above existing ground level. The landscape and visual effects of the proposed land raising are set out in ES	Design Principles (7.5) ES Chapter 7 (6.1) and Appendices (6.2)	Matter Under Discussion

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			<p>Chapter 7 (6.1) and Appendices (6.2).</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the referenced application materials.</p>		
Lighting	2.1.16 [GRAVESHAM-#0696]	Gravesham Borough Council consider that if street lighting is introduced in new areas where it is not currently present, in some cases this would be intrusive and alien to the surrounding landscape.	<p>National Highways note that Design Principle LSP.02 (Planting Strategy) (7.5) applies across the whole of the Project:</p> <p><i>"To preserve the rural and historic nocturnal character of the landscape along the Project route, only junctions and approaches to the portals shall be lit. Lighting will be minimised wherever it is reasonably practicable and safe to do so, but shall remain in accordance with relevant standards."</i></p> <p>National Highways confirms that lighting will be designed to 'reduction of obtrusive lighting' standards to control light spill. Where lighting is in cutting the height of the columns will be designed to keep them below ground level where possible. Within the junction, Lighting will be kept as far as technically</p>	Design Principles (7.5)	Matter Under Discussion

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			<p>practicable to a minimum, whilst meeting the required Design Manual for Roads and Bridges (DMRB) standards (no floodlights are proposed within the area).</p> <p>Additionally, there is woodland planting within the junction and around the perimeter, along with earth embankments (false cuttings) to mitigate the visual impact of the highway.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of application materials.</p>		
A2 Access (Marling Cross)	2.1.17 [GRAVESHAM-#0005]	Gravesham Borough Council was concerned that the design of access points (from Marling Cross) as set out at Statutory Consultation in 2018 could impact on the local road network.	<p>National Highways note that design changes and details specifically relating to LRN access points from Marling Cross, going eastwards on the A2 have been outlined in subsequent materials shared through Supplementary Consultation and Design Refinement Consultation and through the Cordon Model shared with Gravesham Borough Council in April 2020.</p> <p>This specific matter is therefore agreed, without prejudice to</p>	N/A	Matter Agreed

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			further concerns listed in this SoCG about Access to the A2.		
A2 Access (A2 eastbound lanes)	2.1.18 [GRAVESHAM-#0250]	Gravesham Borough Council is concerned that only having 2 lanes eastbound for the A2 main flow is insufficient.	National Highways considers the layout of the A2 junction and the proposal to provide two lanes to be sufficient for the predicted traffic flows.	N/A	Matter Not Agreed
A2 Junction	2.1.19 [GRAVESHAM-#0004]	Gravesham Borough Council does not consider that the junction proposed on the A2 Corridor at Statutory Consultation in 2018 is appropriate.	National Highways notes that design changes and details have been outlined in subsequent materials including Design Refinement Consultation and through the Cordon Model shared with Gravesham Borough Council in April 2020. National Highways considers that measures have been taken to amend the design and mitigate its effects, such that it is an appropriate element of the development. This is considered a matter not agreed on this basis.	N/A	Matter Not Agreed
SWCP / Thong Lane Car Park	2.1.20 [GRAVESHAM-#0525] [GRAVESHAM-#0528] [GRAVESHAM-#0908]	Gravesham Borough Council note that the location for the proposed Thong Lane car park as set out at Community Impact Consultation in 2021 is in the Green Belt, and although good landscaping	National Highways considers that proposals for a new car park at Thong Lane (operational following use of the site as a construction compound is beneficial, and has developed Design Principle (7.5), S2.11 (Thong Lane Car Park) which –	Design Principles (7.5) Project Design Report (7.4) outline Landscape and Ecology Management Plan (oLEMP) (6.7)	Matter Not Agreed

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	<p>[GRAVESHAM-#0910] [GRAVESHAM-#0935]</p>	<p>can be achieved, the accretion of other structures is not appropriate at this location and should be limited to ancillary uses. Gravesham Borough Council consider that the location is likely to draw traffic from Gravesend onto Thong Lane and through the village of Thong. Gravesham Borough Council consider that restoration of the site will be required.</p>	<p>subject to development of detail – will secure landscape treatment to fit contextually within the existing landscape. Throughout the evolution of the design, plans for woodland planting around the car park has been increased to provide better woodland connectivity between Thong Lane Green bridge and Shorne Woods Country Park. National Highways anticipates that the majority of traffic to the new car park will come from the A2/M2 south of Thong Village and thus avoid traffic through the village itself. Details are set out in the Project Design Report (7.4), Design Principles (7.5) and outline Landscape and Ecology Management Plan (oLEMP) (6.7).</p>		
<p>Width of Green Bridges (Thong Lane North and Brewers Road)</p>	<p>2.1.21 [GRAVESHAM-#0554] [GRAVESHAM-#0561] [GRAVESHAM-#0725]</p>	<p>Gravesham Borough Council welcomes the widening of the Thong Lane south land bridge to 40m into response to comments made by it and other parties.</p>	<p>National Highways agreed with Gravesham Borough Council's suggestion and Thong Lane green bridge over the A2 was been widened by 10m to 40m. The total green width will therefore be 20m wide (double the current proposal).</p>	<p>N/A</p>	<p>Matter Not Agreed</p>

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	<p>[GRAVESHAM-#0741] [GRAVESHAM-#0907] [GRAVESHAM-#0934] [GRAVESHAM-#0976]</p>	<p>The strengthening of ecological connectivity between Shorne Wood and Ashenbank Wood is a positive development. Gravesham Borough Council consider that it would be enhanced further if Brewers Road could be enlarged and in an ideal world that at Park Pale (where no change is proposed by LTC to the existing structure). Gravesham Borough Council note that a Landscape Institute Technical Guidance Note 09/2015 December 2015 provides useful benchmarks and comparators, and identifies, inter alia, the importance of appropriate width, depth and gradients of green bridges.</p>	<p>However, it is not agreed that Brewers Road bridge should be further enlarged. A larger bridge over the A2 would cause construction disruption to local and Strategic Road Network (SRN) users for a longer period of time.</p> <p>National Highways note that the physical constraints of Thong Lane Bridge over the A2 differ to those of the Thong Lane bridge over the LTC and while recognising the reference to the Guidance Note, National Highways considers the approach to be appropriate.</p> <p>Brewers Road Green Bridge has not been widened because of the existing constraint of the bridge across HS1.</p> <p>National Highways does not consider that there is justification under the remit of the 2008 Planning Act to deliver a Green Bridge at Park Pale.</p> <p>The location of the planting on and around the bridges has been selected for landscaping reasons, to use the planting to make them into gateway</p>		

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			features for those travelling towards them on the A2.		
Design Principles and Role, Design, Maintenance	2.1.22 [GRAVESHAM-#0690] [GRAVESHAM-#0805]	<p>Gravesham Borough Council is concerned with the approach to surface treatment, and how maintenance issues are dealt with on the proposed Green Bridges, noting that landscaping is focussed on west side of Thong Lane (A2) and the east side of Brewers Road bridge.</p> <p>Gravesham Borough Council consider that the application should include the role of Green Bridges as mitigation relating to the visual impact of the Project as well as accessibility.</p> <p>Gravesham Borough Council notes that the A2 currently has well-established planting areas either side and along the central reservation, providing valuable habitat, and enabling the movement of some species, and is concerned that the proposed widening works will result in removal of</p>	<p>National Highways has considered and incorporated elements suggested by Gravesham Borough Council where practicable.</p> <p>The DCO application via the Design Principles (7.5) STR.08 makes clear that the Green Bridges are multi-functional in terms of mitigation.</p> <p>In terms of maintenance, National Highways will maintain the structure; Gravesham Borough Council would maintain the structure surfacing (not the green section); and National Highways will manage the green element (via third party at National Highways cost).</p> <p>National Highways will replant vegetation where possible to either side of the A2. There is no space for a planted central reserve - it was considered preferable to limit widening and associated impacts on the Area of Outstanding National Beauty (AONB) and country parks. The green bridges would provide better flight lines for species to</p>	Design Principles (7.5)	Matter Under Discussion

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		planted areas across a very wide area, including the HS1 corridor.	cross the A2, and would strengthen links between either side. This matter remains under discussion subject to Gravesham Borough Council review application documents.		
Bridge Design	2.1.23 [GRAVESHAM-#0686] [GRAVESHAM-#0689] [GRAVESHAM-#0664] [GRAVESHAM-#0675] [GRAVESHAM-#0685]	Gravesham Borough Council consider that all structures with Gravesham should be to a high design standard as they are either in the AoNB or in its setting; and should extend beyond the line of the route to include the A2/M2 corridor, as this is to be altered considerably, resulting in the severance of the Kent Downs Area of Outstanding Natural Beauty (AONB). Gravesham Borough Council note that structures forming part of the LTC/A2 junction will be prominent in the landscape and the setting of the AONB.	National Highways note that the historical severance of the A2 corridor is being altered by the Project with an additional junction and slip roads. While the Design Principles (7.5) sets out that Thong Lane Bridge over LTC (STR.03) is a 'Project Enhanced Structure', the remaining two new (replacement) structures, Thong Lane (over M2/A2) and Brewers Road are also subject to STR.07, that ensures a high standard of design will be maintained. National Highways also notes that Design Principle S2.10 relates to the integration of retaining wall structures within the AONB. National Highways notes that The Design Principles (7.5) relate to the proposed project design and not existing	Design Principles (7.5)	Matter Under Discussion

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			<p>structures that are not being replaced or physically altered.</p> <p>The common design language applied across the whole of the proposed Project design, and is secured by Design Principle clause PLA.03.</p> <p>National Highways notes that Design Principles are commitments that are above and beyond any statutory requirements, and is content that the physical effect of the Project along the M2/A2 Corridor has been carefully considered and the current preliminary design proposals seeks to minimise any adverse effects as far as technically practicable whilst providing landscape, ecological and environmental mitigation.</p> <p>This matter remains under discussion subject to Gravesham Borough Council review application documents.</p>		
Construction					
Construction Workforce Effects on Accommodation	2.1.24 [GRAVESHAM-#0577]	Gravesham Borough Council is concerned about National Highways' assumption that the	National Highways has reviewed and updated technical assumptions on construction worker demand for local	ES Chapter 13 (6.1) Worker Accommodation Report (7.18)	Matter Under Discussion

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	<p>[GRAVESHAM-#0877] [GRAVESHAM-#0948]</p>	<p>construction workforce will be able to find local accommodation without affecting the capacity and ability of local residents to access and retain accommodation in the private rented sector, particularly those at risk of homelessness and in housing need.</p> <p>Gravesham Borough Council notes that this is exacerbated by other major construction projects adding to demand for accommodation in the local area.</p>	<p>accommodation, which will be reported in the Chapter 13 of the ES (6.1) and in the Worker Accommodation Report (7.18), which also considers a negligible effect related to cumulative projects.</p> <p>This reaffirms National Highways view that there is sufficient accommodation for the construction workforce for the Project across various accommodation types including private rented accommodation, though recognising that there could be localised concentrations.</p> <p>National Highways is developing measures to support workers to access accommodation and monitor and reduce potential local concentrations as set out within the Framework Construction Travel Plan (FCTP) (7.13).</p> <p>This matter remains under discussion subject to Gravesham Borough Council review application documents.</p>	<p>Framework Construction Travel Plan (FCTP) (7.13)</p>	
<p>Effects on Living Conditions /</p>	<p>2.1.25</p>	<p>Gravesham Borough Council is concerned about effects on residents at</p>	<p>National Highways has recognised this concern and proposed changes to the Code</p>	<p>Outline Traffic Management Plan for</p>	<p>Matter Under Discussion</p>

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Habitability of properties	<p>[GRAVESHAM-#0575]</p> <p>[GRAVESHAM-#0819]</p> <p>[GRAVESHAM-#0946]</p>	<p>Polperro and Viewpoint Place (caravans) in terms of acceptable living conditions considering possible 24 hour working, and possibility of up to 5m spoil stockpiles.</p> <p>Gravesham Borough Council consider that these homes may be uninhabitable as a result of the proximity of construction sites and access and mitigation should be applied.</p>	<p>of Construction Practice (CoCP) (ES Appendix 2.2) (6.3) that would restrict core working hours activities within 300m of residential properties, subject to pre-construction noise levels and construction methodology.</p> <p>Construction noise associated with the Project has been assessed in accordance with appropriate UK guidance on construction noise, BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites (parts 1 and 2).</p> <p>Chapter 12 of the ES (6.1) fully considers noise associated with the southern tunnel portal as part of the study (including the implications of 24hr working).</p> <p>National Highways considers that all mitigation measures are presented in a range of control documents most notably the oTMPfC (7.14), CoCP (6.3), outline Materials Handling Plan (oMHP) appended to the CoCP (6.3), outline Site Waste Management Plan (oSWMP) appended to the CoCP (6.3),</p>	<p>Construction (oTMPfC) (7.14)</p> <p>Code of Construction Practice (CoCP) (6.3)</p> <p>Outline Materials Handling Plan (oMHP) (6.3)</p> <p>outline Site Waste Management Plan (oSWMP) (6.3)</p> <p>Design Principles (7.5)</p> <p>Register of Environmental Actions and Commitments (REAC) (6.3)</p> <p>ES Chapter 12 (6.1)</p>	

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			<p>Design Principles (7.5) and the REAC (6.3).</p> <p>The REAC (6.3), specifically, presents good practice mitigation and a framework for dealing with potential exceedances. It should be noted that an environmental management plan, developed post DCO consent by the contractor in line with the controls and commitments in the CoCP (6.3) and REAC (6.3), would provide further details on these mitigation measures. Gravesham Borough Council would be a consultee to this document.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application materials.</p>		
Use of the River - Principle	2.1.26 [GRAVESHAM-#0308]	Gravesham Borough Council consider that National Highways should investigate better use of the river to remove spoil and to reduce HGV movements on the main network.	<p>National Highways agrees with the principle that importing and exporting materials via the river could reduce the number of trips on some of the network.</p> <p>However, National Highways notes that the Project's earthwork balance estimate indicates little demand to</p>	Outline Materials Handling Plan (oMHP) (6.3)	Matter Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			transport excavated material offsite south of the river. This is set out within the oMHP (6.3)		
Use of the River – Local Road Network	2.1.27 [GRAVESHAM-#0308]	Gravesham Borough Council consider that consideration should therefore be given to enhancing access to the Denton area (i.e. Wharf Road) from Gravesend Road to remove spoil via river.	National Highways considers that in this case, to import materials to the construction compounds south of the River Thames via existing ports is not favourable, due to the reliance of the local road network and no direct access to construction compounds. The construction of direct access between the river to construction compounds is constrained by the Thames Estuary and Marshes Ramsar. The Project's earthwork balance estimate indicates little demand to transport excavated material offsite south of the river, negating the need to provide disruptive works to enhance local roads that would be used temporarily and to only a limited extent. This is set out within the oMHP (6.3)	Outline Materials Handling Plan (oMHP) (6.3)	Matter Not Agreed
Information about the Construction	2.1.28 [GRAVESHAM-#0571]	Gravesham Borough Council is concerned about the lack of construction	National Highways will present the full suite of effects and mitigation related to this	Transport Assessment (7.9)	Matter Under Discussion

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programme / Impacts		programme and impact information.	<p>concern in the ES (6.1), Transport Assessment (7.9), Health and Equality Impact Assessment (HEqIA) (7.10) and CoCP (6.3) and REAC (6.3).</p> <p>All mitigation measures are presented in a range of control documents most notably the oTMPfC (7.14), CoCP (6.3), oMHP (6.3), oSWMP (6.3), Design Principles (7.5) and the REAC (6.3).</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application documents.</p>	<p>Health and Equality Impact Assessment (HEqIA) (7.10)</p> <p>Outline Traffic Management Plan for Construction (oTMPfC) (7.14)</p> <p>Code of Construction Practice (CoCP) (6.3)</p> <p>Outline Materials Handling Plan (oMHP) (6.3)</p> <p>outline Site Waste Management Plan (oSWMP) (6.3)</p> <p>Design Principles (7.5)</p> <p>Register of Environmental Actions and Commitments (REAC) (6.3)</p>	
Community Liaison during Construction	2.1.29 [GRAVESHAM-#0540] [GRAVESHAM-#0913]	<p>Gravesham Borough Council consider that the Project should include an "independent complaints commissioner" to deal with resident's concerns during construction, similar to HS1 and Crossrail.</p> <p>Additionally, Gravesham Borough Council consider that local liaison</p>	National Highways agrees with this approach and has made provision in the CoCP (6.3) and secured through contractual arrangements with Contractors.	Code of Construction Practice (CoCP) (6.3)	Matter Under Discussion

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		mechanisms with LPAs, residents and businesses will be needed to cover local and strategic issues. Gravesham Borough Council consider that these arrangements should be based on spatial areas rather than contracts/contractors.			
Adequacy of Mitigation	2.1.30 [GRAVESHAM-#0572] [GRAVESHAM-#0584]	Gravesham Borough Council note that construction impacts extend over 5 years with effects on noise and disturbance, disruption to highways and Public Rights of Way (PRoW), large scale spoil movement and severance, and consider this to be longer than 'short term', and are concerned that there has been relatively little information provided through consultations as to how these impacts might be mitigated, with reliance placed on the CoCP and REAC.	National Highways will present the full suite of effects and mitigation related to this concern in the ES (6.1), Transport Assessment (7.9), Health and Equality Impact Assessment (HEqIA) (7.10) and CoCP (6.3) and REAC (6.3). Duration is a factor in determining significance in the ES as it contributes to magnitude, and therefore also drives the approach to mitigation. All mitigation measures are presented in a range of control documents most notably the oTMPfC (7.14), CoCP (6.3), oMHP (6.3), oSWMP (6.3), Design Principles (7.5) and the REAC (6.3).	Transport Assessment (7.9) Health and Equality Impact Assessment (HEqIA) (7.10) Outline Traffic Management Plan for Construction (oTMPfC) (7.14) Code of Construction Practice (CoCP) (6.3) Outline Materials Handling Plan (oMHP) (6.3) outline Site Waste Management Plan (oSWMP) (6.3) Design Principles (7.5) Register of Environmental Actions	Matter Under Discussion

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			This matter remains under discussion subject to Gravesham Borough Council's review of the above documents	and Commitments (REAC) (6.3)	
Compensation Request	2.1.31 [GRAVESHAM-#0582]	Gravesham Borough Council consider that cumulative impacts on residents and local businesses in both construction and operational phases should be assessed and appropriate compensation secured.	National Highways has assessed the effects on local residents and businesses as part of ES Chapter 13 Population and Health (6.1), ES Chapter 16 Cumulative Effects Assessment (6.1) and the HEqIA (7.10). Compensation arrangements for affected landowners and businesses are noted in ES Chapter 13 (6.3). All mitigation measures are presented in a range of control documents most notably the oTMPfC (7.14), CoCP (6.3), oMHP (6.3), oSWMP (6.3), Design Principles (7.5) and the REAC (6.3), drafts of which were consulted on at CIC in 2021. This matter remains under discussion pending Gravesham Borough Council review of application documents.	ES Chapter 13 and 16 (6.1) Health and Equality Impact Assessment (HEqIA) (7.10) Outline Traffic Management Plan for Construction (oTMPfC) (7.14) Code of Construction Practice (CoCP) (6.3) Outline Materials Handling Plan (oMHP) (6.3) outline Site Waste Management Plan (oSWMP) (6.3) Design Principles (7.5) Register of Environmental Actions and Commitments (REAC) (6.3)	Matter Under Discussion
Impacts on Hydrology	2.1.32	Gravesham Borough Council is concerned to fully	National Highways note that this is covered in the Road Drainage	Register of Environmental Actions	Matter Under Discussion

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	[GRAVESHAM-#0768]	understand how impacts on underlying hydrology, as a result of excavations and spoil tipping are managed during the construction of the Project.	and Water Environment Chapter (Chapter 14) of the ES (6.1) and suitable mitigation presented in the REAC (6.3). This matter remains under discussion subject to Gravesham Borough Council's review of the above application documents.	and Commitments (REAC) (6.3) ES Chapter 14 (6.1)	
Access to Compounds	2.1.33 [GRAVESHAM-#0769] [GRAVESHAM-#0875]	Gravesham Borough Council is concerned that the impacts of compounds and their associated access requirements are likely to be very significant, over a long period of time, and should be assessed. Gravesham Borough Council consider that using existing or provided public transport must be a major objective and that a bus (or minibus) link from Gravesend Transport Hub to the sites (depending on what the internal options are for moving round the construction sites) should be provided.	National Highways has assessed the location of construction compounds and associated access in the ES (6.1) and the Transport Assessment (7.9). All mitigation measures are presented in a range of control documents most notably the oTMPfC (7.14), CoCP (6.3), oMHP (6.3), oSWMP (6.3), Design Principles (7.5) and the REAC (6.3), drafts of which were consulted on at CIC in 2021. The oTMPfC (7.14) in particular provides an overview of the approach that will be followed when undertaking temporary traffic management during construction.	Transport Assessment (7.9) Health and Equality Impact Assessment (HEqIA) (7.10) Outline Traffic Management Plan for Construction (oTMPfC) (7.14) Code of Construction Practice (CoCP) (6.3) Outline Materials Handling Plan (oMHP) (6.3) outline Site Waste Management Plan (oSWMP) (6.3) Design Principles (7.5) Register of Environmental Actions	Matter Under Discussion

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			<p>It also discusses access routes to compounds and explains management measures available to Contractors to reduce the impact on the local community (including journey time reliability, access, and safety).</p> <p>The oTMPfC (7.14) will be used to inform the update of a Traffic Management Plan for Construction (TMP), a requirement of the DCO (3.1), which will be produced by the Contractors.</p> <p>It should be noted that Gravesham Borough Council would be a consultee to the production of this document.</p> <p>The FCTP (7.13) sets out principles for worker travel to compounds. The key aim of this FCTP (7.13) is to minimise adverse local disruption or traffic impacts on the highway network from worker travel to and from construction areas and construction compounds. A shuttle bus would be available to access CA3b from the Gravesend hub, but the details of the routing, timings and</p>	<p>and Commitments (REAC) (6.3)</p> <p>Draft Development Consent Order (DCO) (3.1)</p> <p>Framework Construction Travel Plan (FCTP) (7.13)</p>	

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			<p>vehicle size would be determined by the contractor as set out in the FCTP (7.13).</p> <p>It should be noted that Site Specific Travel Plans (SSTPs) will be produced by the contractors (in line with the controls and commitments in the FCTP) for each compound, or compounds where these are closely located with similar levels of accessibility. The SSTPs will be subject to review (and approval) by the Secretary of State, in consultation with relevant planning authorities such as Gravesham Borough Council.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the above application documents.</p>		
LRN Construction Access Points – Marling Cross	2.1.34	Gravesham Borough Council is concerned about the Projects access proposals from the A2 via Marling Cross for HGVs to construction compounds.	National Highways note that the main access to the site for works vehicles, including Heavy Goods Vehicles (HGVs), would be via the eastbound A2. From here, vehicles would use an eight-metre wide, two-way haul road. Existing access on the north side of the A2, which used	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion

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			<p>to be part of the former Esso petrol station, would be adapted.</p> <p>There would be a secondary access on Thong Lane. HGVs would use the A2 as their primary access rather than driving through Thong village. Thong Lane would, however, be available to worker traffic which would mostly consist of cars and vans.</p> <p>Further detail is set out in the Outline Traffic Management Plan for Construction (oTMPfC) (7.14) and This matter remains under discussion subject to Gravesham Borough Council's review of that document following submission.</p>		
Working Hours	2.1.35 [GRAVESHAM- #0865]	Gravesham Borough Council is concerned that the proposed working hours consulted upon during CIC and in particular the location of 24-hour working activities (tunnelling) north of Thong could cause noise and disturbance, outside normal working hours, over a long period.	National Highways has recognised this concern and proposed changes to the CoCP (6.3) that would restrict to core working hours activities within 300m of residential properties, subject to pre-construction noise levels and construction methodology. Additionally, works undertaken in impact zones will be included, prior to undertaking the works,	Transport Assessment (7.9) Outline Traffic Management Plan for Construction (oTMPfC) (7.14) Code of Construction Practice (CoCP) (6.3) Outline Materials Handling Plan (oMHP) (6.3)	Matter Under Discussion

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			<p>in the application made by the Contractor to the relevant local authority under Section 61 of the Control of Pollution Act 1974 unless appealed.</p> <p>All mitigation measures are presented in a range of control documents most notably the oTMPfC (7.14), CoCP (6.3), oMHP (6.3), oSWMP (6.3), Design Principles (7.5) and the REAC (6.3), drafts of which were consulted on at CIC in 2021.</p> <p>The REAC (6.3), specifically, presents good practice mitigation related to all ES topics including air quality, noise, disturbance and amenity impacts. It also presents a framework for dealing with exceedances.</p> <p>It should be noted that an environmental management plan, developed post DCO consent by the contractor in line with the controls and commitments in the CoCP (6.3) and REAC (6.3), would provide further details on these mitigation measures.</p> <p>Gravesham Borough Council</p>	<p>outline Site Waste Management Plan (oSWMP) (6.3)</p> <p>Design Principles (7.5)</p> <p>Register of Environmental Actions and Commitments (REAC) (6.3)</p> <p>Draft Development Consent Order (DCO) (3.1)</p>	

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			<p>would be a consultee to this document.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of (new) commitment set out above details set out in application documents above.</p>		
Effects on PRoW	2.1.36 [GRAVESHAM-#0847]	Gravesham Borough Council is concerned that there are cycle lanes along the A226 from Gravesend to Higham, which are not displaced or stopped up permanently by the Project, but could experience construction effects.	<p>National Highways notes that sections of the A226 are to be used by the Project's construction traffic.</p> <p>To manage this, provision has been made within the Order Limits to temporarily widen the A226, should it be considered necessary to maintain the safety of vulnerable road users whilst the A226 is being used by the Project's construction traffic and for the utilities diversion works.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the amendments to the Order Limits provided as part of the application.</p>	N/A	Matter Under Discussion
Effects on Woodland	2.1.37 [GRAVESHAM-#0774]	Gravesham Borough Council notes that the Shorne Ifield Road ULH coincides (in part) with the	National Highways agree that the woodland extension will be established as soon as the ULH is no longer required, subject to	outline Landscape and Ecology Management Plan (oLEMP) (6.7) Design Principles (7.5)	Matter Under Discussion

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		<p>area proposed for the woodland extension to Shorne Woods CP (north of Brummelhill Wood), and therefore there must be a strong case for establishing the woodland extension as soon as the ULH is no longer required (following LSP.23 in the Design Principles).</p> <p>Gravesham Borough Council note that the same applies to the A2 West ULH, Park Pale ULH and A2 East ULH.</p>	<p>seasonal constraints and the co-ordination of the wider project landscape schedule. National Highways are committed to the development of a LEMP, post DCO consent, to be developed in line with the controls and commitments in the oLEMP (6.7), Design Principles (7.5) and REAC (6.3). Gravesham Borough Council will be a consultee to the development of this document. This matter remains under discussion subject to Gravesham Borough Council's review of the oLEMP (6.7) and REAC (6.3) submitted as part of the DCO application</p>	<p>Register of Environmental Actions and Commitments (REAC) (6.3)</p>	
Monitoring of the Construction Workforce	2.1.38 [GRAVESHAM-#0876]	<p>Gravesham Borough Council consider it important that the actual construction staff locations are regularly analysed and the travel plans updated to response to changes in construction and bases to ensure the approaches are fit for purpose.</p>	<p>National Highways agree and the FCTP (7.13) sets out these details.</p> <p>The FCTP includes a Project Action Plan that identifies a programme of regular scheduled activities and monitoring to be carried out during the Project's construction period, including analysis of workforce origin locations, monitoring of travel patterns,</p>	<p>Framework Construction Travel Plan (FCTP) (7.13)</p>	<p>Matter Under Discussion</p>

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			<p>travel surveys and review of Site Specific Travel Plans as required.</p> <p>Relevant timescales for each action (such as review of the Site Specific Travel Plans) is also provided.</p> <p>This matter remains under discussion subject to further detail that Gravesham Borough Council would be able to review within application materials on the frequency and approach to monitoring.</p>		
Wider Effects	2.1.39 [GRAVESHAM- #0886]	<p>Gravesham Borough Council consider that the construction phase impacts on local residents and businesses will be significant, both perceived and real.</p> <p>Gravesham Borough Council consider that the changes to traffic flow may increase journey times and impact on access to services and businesses locally and across Kent.</p>	<p>National Highways has assessed effects on local residents and businesses as part of ES Chapter 13 Population and Human Health (6.1), ES Chapter 16 Cumulative Effects Assessment (6.1) and the HEqIA (7.10).</p> <p>Impacts on traffic and transport are presented in the Transport Assessment (7.9).</p> <p>All mitigation measures are presented in a range of control documents most notably the oTMPfC (7.14), CoCP (6.3), Design Principles (7.5) and the REAC (6.3), drafts of which</p>	<p>ES Chapter 13 and 16 (6.1)</p> <p>Transport Assessment (7.9)</p> <p>Health and Equality Impact Assessment (HEqIA) (7.10)</p> <p>Outline Traffic Management Plan for Construction (oTMPfC) (7.14)</p> <p>Code of Construction Practice (CoCP) (6.3)</p> <p>Design Principles (7.5)</p> <p>Register of Environmental Actions</p>	Matter Under Discussion

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			<p>were consulted on at CIC in 2021.</p> <p>It should be noted that an environmental management plan, developed post DCO consent by the contractor in line with the controls and commitments in the CoCP (6.3) and REAC (6.3), would provide further details on these mitigation measures.</p> <p>Gravesham Borough Council would be a consultee to this document.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application documents above.</p>	<p>and Commitments (REAC) (6.3)</p>	
Local Effects	2.1.40 [GRAVESHAM-#0887]	Gravesham Borough Council is concerned about the implications for residents close to the construction activity particularly at Marling Cross, properties adjacent land south of Riverview Park, Thong Village residents, and all residents on Thong Lane, in Chalk along the A226 and Castle Lane, Church Lane and St	<p>Working hours are outlined in Section 6 of the CoCP. All potential impacts of construction activities are covered in the ES.</p> <p>Effects on local residents and businesses are included as part of ES Chapter 13 Population and Human Health (6.1), ES Chapter 16 Cumulative Effects Assessment (6.1) and the HEqIA (7.10), and summarised and reported in terms of specific communities and their local</p>	<p>ES Chapter 13 and 16 (6.1)</p> <p>Transport Assessment (7.9)</p> <p>Health and Equality Impact Assessment (HEqIA) (7.10)</p> <p>Outline Traffic Management Plan for Construction (oTMPfC) (7.14)</p>	Matter Under Discussion

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		<p>Mary's church in terms of noise and disturbance, traffic, loss of amenity, possible 24 hour working, a 2.4m high hoarding (in some locations).</p>	<p>receptors within the Community Impact Report (7.16). Impacts on traffic and transport are covered presented in the Transport Assessment (7.9). All mitigation measures are presented in a range of control documents most notably the oTMPfC (7.14), CoCP (6.3), Design Principles (7.5) and the REAC (6.3), drafts of which were consulted on at CIC in 2021. The REAC (6.3), specifically, presents good practice mitigation related to all ES topics including air quality, noise and amenity impacts. It also presents a framework for dealing with exceedances. It should be noted that an environmental management plan, developed post DCO consent by the contractor in line with the controls and commitments in the CoCP (6.3) and REAC (6.3), would provide further details on these mitigation measures. Gravesham Borough Council would be a consultee to this document.</p>	<p>Code of Construction Practice (CoCP) (6.3) Outline Materials Handling Plan (oMHP) (6.3) outline Site Waste Management Plan (oSWMP) (6.3) Design Principles (7.5) Register of Environmental Actions and Commitments (REAC) (6.3)</p>	

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			National Highways recognise that Gravesham Borough Council will need to review the HEqIA (7.10), ES (6.1) and REAC (6.3) to reach a view on this matter.		
Construction Traffic Highway Effects	2.1.41 [GRAVESHAM-#0892] [GRAVESHAM-#0893] [GRAVESHAM-#0576]	Gravesham Borough Council is concerned about the volume of material to be imported via the A2 during construction, particularly where vehicles will need to route to access CA2/3.	The approach to options assessment for routes is set out in the Approach to Design, Construction and Operation Report (shared at Statutory Consultation) and the Need for the Project (7.1) (which will be shared at application). National Highways is considering additional signage and possible mitigation, and will engage with Gravesham during production of Traffic Management Plans (the process for which is set out in the oTMPfC (7.14)). National Highways consider that this matter remains under discussion subject to further engagement on the development of TMPs, and Gravesham Borough Council's review of application documents referenced above.	The Need for the Project (7.1) Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
Construction effects from Southern Portal and ULHs	2.1.42 [GRAVESHAM-#0279] [GRAVESHAM-#0802]	Gravesham Borough Council considered at Supplementary Consultation that in terms of the additional land-take around the southern tunnel portal, insufficient information has been provided on potential impacts as a result of construction activity and subsequent mitigation. Gravesham Borough Council consider that Noise and Air quality effects were downplayed in Community Impact Consultation documents around the Southern Tunnel compound and at ULHs in terms of adverse impacts on local residents and existing access routes.	It is not agreed that impacts on noise or air quality have been downplayed during consultation, but National Highways note that a full assessment has been set out within the Environmental Statement (6.1). National Highways recognise that Gravesham Borough Council will need to review the ES (6.1) and REAC (6.3) in order to reach a position on This matter, and as such it remains under discussion.	Register of Environmental Actions and Commitments (REAC) (6.3)	Matter Under Discussion
Temporary Diversions of Highway during Construction	2.1.43 [GRAVESHAM-#0870]	Gravesham Borough Council is concerned about reductions in capacity and diversions along Halfpence Lane and Brewers Road when the bridge over the A2 is shut for rebuilding (19 months), affecting access to Shorne Woods Country Park, Ashenbank Wood,	National Highways has actively engaged with stakeholders with statutory duties to the local highway network, community facilities and businesses regarding the traffic impacts of the Project, and supplied outputs from modelling and held appropriate technical meetings,	Register of Environmental Actions and Commitments (REAC) (6.3) Framework Construction Travel Plan (FCTP) (7.13)	Matter Under Discussion

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		Cobham Hall School, Rochester and Cobham Park Golf Course, the Inn on the Lake Motel and the Nook Pet Hotel.	supported by further data assistance where necessary. The ES (6.1), REAC (6.3) and FCTP (7.13) sets out the approach to impact assessment on identified receptors, and any mitigation in place to reduce significant effects. National Highways recognise that Gravesham Borough Council will need to review the ES and REAC in order to reach a position on This matter, and as such it remains under discussion.		
Operations and Maintenance					
Lack of RASA in Project	2.1.44 [GRAVESHAM-#0267] [GRAVESHAM-#0821] [GRAVESHAM-#0822] [GRAVESHAM-#0942]	Gravesham Borough Council oppose the removal of a dedicated RASA and maintenance depot for the Lower Thames Crossing (LTC) and consider that replacement RASA and lorry parking facilities should be provided within the Project.	It is not agreed that additional provision should be considered as part of the Project, but will be considered by National Highways Operational Directorate across the Strategic Road Network. Recognising that lorry parking is a multi-agency issue, National Highways' Operational Directorate will be setting out its position across the Strategic Road Network through its Route Strategies and in considerations for RIS3 (see Vision for Route	N/A	Matter Not Agreed

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			Strategies). This will be informed by a consultation exercise looking into why there has not been more roadside facilities and lorry parks developed in the north east quadrant of the M25.		
Access to Incidents and Response Times (Wider Network)	2.1.45 [GRAVESHAM-#0837]	Gravesham Borough Council notes that the Emergency Services are concerned about access to incidents and effects on response times - especially due to the lack of a hard shoulder on the A122) – on the wider network	<p>National Highways recognises Gravesham Borough Council's concerns and notes that this is being addressed by the Emergency Services Spatial Planning Group (ESSPG) under their Community Impacts Consultation response recommendation 5.7.</p> <p>National Highways is comfortable that it can demonstrate how to access incidents and access to the network can be achieved in the current design.</p> <p>Emergency Response Plans will be developed for the tunnel, and where applicable national plans/procedures will be used for the open road.</p> <p>This matter remains under discussion subject to agreement to be developed between National Highways ESSPG.</p>	N/A	Matter Under Discussion

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Evacuation from Tunnels	2.1.46 [GRAVESHAM-#0838]	Gravesham Borough Council notes that the Emergency Services are concerned about the frequency of cross-passages within the tunnels affecting rescue and evacuation from the tunnels, as well as concerns of detail relating to the emergency access roads and helicopter landing points.	<p>Engagement with the Emergency Services and their Safety Partners is undertaken through the ESSPG.</p> <p>This has resulted in changes to the Project including identifying location and requirements for Rendez-vous Point (RVP) locations and agreeing the provision of helicopter landing points during the construction and operation of the project for emergency services.</p> <p>National Highways acknowledge the preference for cross-passages to be spaced at 100m but remain confident that 150m spacing provides an appropriate level of safety.</p> <p>This matter remains under discussion subject to agreement to be developed between National Highways ESSPG.</p>	N/A	Matter Under Discussion
Charging					
Principle of Discount for Local Residents	2.1.47 [GRAVESHAM-#0384]	Notwithstanding matters not agreed below (timing of the start of local discounts, and discounts for Gravesham residents on both the LTC and the Dartford Crossing), Gravesham Borough	National Highways position is that the Local Residents Discount Scheme will be offered to residents living in Boroughs hosting a tunnel portal for the crossing in question, mirroring the same provision at Dartford.	Road User Charging Statement (7.6)	Matter Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		Council consider that discounted or free crossing use for Gravesham residents should be implemented as a way of mitigating the on-going environmental, social and ecological harm that will be caused by the crossing.	A Road User Charging Statement (7.6) will be submitted as part of the DCO application that sets out the justification for the Project's approach to local discounts.		
Timing and Approach to Equity (Dartford Crossing)	2.1.48 [GRAVESHAM-#0012] [GRAVESHAM-#0339] [GRAVESHAM-#0588] [GRAVESHAM-#0916]	Gravesham Borough Council consider that a charge reduction should apply to both the Dartford and Lower Thames Crossings and be implemented from the point at which construction starts.	National Highways position is that extending the discount received by Gravesham residents to use of the Dartford crossing would lead to additional traffic at Dartford, whereas the objective of the Project is to reduce traffic volumes on that crossing.	N/A	Matter Not Agreed
Peak Charges	2.1.49 [GRAVESHAM-#0012]	Gravesham Borough Council consider that there should be no peak charges for use of the LTC.	National Highways confirm that there will be no differential peak charging for use of the LTC.	N/A	Matter Agreed
Community Fund (Revenue from Charging)	2.1.50 [GRAVESHAM-#0012]	Gravesham Borough Council consider that a proportion of revenues for charging should be paid to a Community Fund	National Highways note that revenues raised by the charge will be accounted for in the DfT's Main Supply Estimate which is voted for annually by Parliament and are not part of the funding mechanism for the	N/A	Matter Not Agreed

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			crossing or any local community funds. The Project has committed to a Community Fund.		
Charging for HGVs	2.1.51 [GRAVESHAM-#0340]	Gravesham Borough Council supports the logic that charging for HGV's should be differential to encourage use of LTC rather than the Dartford Crossing.	National Highways note that stakeholder feedback received from the 2018 Statutory Consultation was generally in favour of equal charges at both crossings. There is no proposal to have differential charging of HGVs between the Dartford and the Lower Thames crossings.	N/A	Matter Not Agreed
Traffic and Economics					
Local Growth Assumptions	2.1.52 [GRAVESHAM-#0010] [GRAVESHAM-#0036] [GRAVESHAM-#0039] [GRAVESHAM-#0120] [GRAVESHAM-#0337] [GRAVESHAM-#0342]	Gravesham Borough Council is concerned that the Project does not fully assess the likely significant effects from traffic, due to its approach to consideration of development/growth within the model. Key areas of disagreement include: The model does not take into account the Government's approach	National Highways consider that the Project's transport model was built following the principles and processes set out in the Department for Transport's (DfT) Transport Analysis Guidance (TAG). Growth within the transport model is capped in line with DfT traffic forecasts (TEMPro 7.2) and adjusted locally to account for developments close to the Project that are under construction, have a planning application and planning permission (as of 30 th	Transport Forecasting Package (Appendix C of the ComMA) (7.7)	Matter Not Agreed

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	[GRAVESHAM-#0569] [GRAVESHAM-#0615] [GRAVESHAM-#0645] [GRAVESHAM-#0650] [GRAVESHAM-#0789] [GRAVESHAM-#0839] [GRAVESHAM-#0840] [GRAVESHAM-#0841]	to Objectively Assessed Need; and The model does not account for all allocated growth within the Local Plans.	September 2021 for our DCO submission). A high growth scenario is also undertaken and reported within the Transport Forecasting Package (Appendix C of the ComMA) (7.7), a copy of which has been provided to the authority dated October 2020.		
Interpretation of DMRB Guidance	2.1.53 [GRAVESHAM-#0844]	Gravesham Borough Council consider that the DMRB advice in relation to traffic modelling has been interpreted in a very narrow way.	The model has been independently assured confirming that it is suitable to assess the impacts of the Project.	N/A	Matter Not Agreed
Compliance with EIA Regulations and Reliability of LTAM	2.1.54 [GRAVESHAM-#0177] [GRAVESHAM-#0334] [GRAVESHAM-#0414]	Gravesham Borough Council is concerned that due to the approach to consideration of development within the Transport Model, the application fails to meet the requirements of the Infrastructure Planning	National Highways notes that the LTAM is a strategic transport model and covers a vast area; and has been calibrated and validated in line with DMRB guidance. Details of this are contained within the Transport Model	Transport Forecasting Package (Appendix B of the ComMA) (7.7)	Matter Not Agreed

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	[GRAVESHAM-#0824]	(Environmental Impact Assessment) Regulations 2017 in assessing likely significant effects. Gravesham Borough Council consider that the Lower Thames Area Model (LTAM) is weak and unreliable when used to consider the Local Road Network (LRN)	Package (Appendix B of the ComMA) (7.7). In National Highways' view, given the scale and detail of the model, it is not possible to achieve validation on every road, although care has been taken in the areas close to where the Project would interface with the existing road network.		
Assessment Years	2.1.55 [GRAVESHAM-#0546] [GRAVESHAM-#0333]	Gravesham Borough Council consider that focusing transport modelling on the opening year rather than the design year understates the impacts on air quality.	National Highways consider that Air quality data in the Environment Statement (Chapter 5) (6.1) need only be presented for the opening year, as that is considered to represent the worst case in terms of emissions and follows the approach determined by EIA legislation and guidance.	ES Chapter 5 (6.1)	Matter Not Agreed
Tilbury Junction Arrangement	2.1.56 [GRAVESHAM-#0941]	Gravesham Borough Council note that the restoration of A13 junction arrangement presented at Local Refinement Consultation is a revision to original proposals. Gravesham Borough Council consider that it would be reasonable to	As Gravesham Borough Council is aware, the Tilbury Link Road is not part of the Project, and never has been, and is being progressed by National Highways as a separate project to LTC, as part of Roads Investment Strategy (RIS) 2. National Highways has not yet identified a preferred route and	N/A	Matter Not Agreed

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		assume that a link running due West into the Port of Tilbury would offer a more direct route from south of the river into parts of Thurrock could exist in year 15 and should be modelled in the context of flows across the crossings.	therefore cannot include this within modelling as proposed by Gravesham Borough Council.		
Wider Network Impacts					
Effect on Dartford Crossing	2.1.57 [GRAVESHAM-#0829]	Gravesham Borough Council consider that National Highways assessment of benefits to reducing congestion at the Dartford Crossing are overstated, and in the longer term the crossing remains capacity limited.	The Project is forecast to reduce traffic flows at the Dartford Crossing by around 20% in its opening year. As a result of continuing forecast traffic growth, traffic levels at Dartford are forecast to increase, returning broadly to 2016 levels in the mid 2040's. However, even at this time, flows at Dartford would be lower than if the Lower Thames Crossing had not been built. It is not possible for any infrastructure scheme to maintain the benefits it offers in its opening year forever in a climate of ever increasing traffic growth.	N/A	Matter Not Agreed
Impacts/Mitigation on the WNI – e.g.	2.1.58	Gravesham Borough Council is concerned about	National Highways recognises that as a result of the Lower	Wider Network Impacts Management	Matter Not Agreed

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A227, A228, A229 and M2	<p>[GRAVESHAM-#0008]</p> <p>[GRAVESHAM-#0009]</p> <p>[GRAVESHAM-#0338]</p> <p>[GRAVESHAM-#0567]</p> <p>[GRAVESHAM-#0655]</p> <p>[GRAVESHAM-#0826]</p> <p>[GRAVESHAM-#0827]</p> <p>[GRAVESHAM-#0830]</p> <p>[GRAVESHAM-#0834]</p> <p>[GRAVESHAM-#0870]</p>	<p>the wider impacts of the Project on the highway network in Kent, in particular the A227, A228, A229 and M2, Bluebell Hill Junction and consider a full assessment should be undertaken.</p> <p>Gravesham Borough Council consider that where the Project generates additional trips on the surrounding road network, these should be mitigated by the Project where they constitute a significant adverse impact.</p>	<p>Thames Crossing opening, people will choose to make different journeys. In many places on the network, and within Kent, this will lead to beneficial transport impacts on the network, and in some cases will lead to adverse transport impacts. Overall, the benefits on the road network outweigh the adverse transport impacts, and this is reflected in the positive economic benefit of the project within Kent.</p> <p>National Highways has identified the adverse transport impacts on traffic flows across the local road network, and this assessment will be set out in the Transport Assessment (7.9) and wider Environmental Statement (6.1) documentation within the DCO submission.</p> <p>National Highways has assessed the wider network impacts of the Project and has considered these against the requirements set out in the National Policy Statement for National Networks (DfT, 2014), and based on this does not agree that the adverse impacts</p>	<p>and Monitoring Plan (WNIMMP) (7.12)</p> <p>Transport Assessment (7.9)</p> <p>Environmental Statement (6.1)</p>	

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			<p>are unacceptable under this policy.</p> <p>National Highways is obligated to work with local highway authorities and others to align national and local plans and investments, balance national and local needs and support better end to end journeys for road users (National Highways License from DfT para 5.1.9) and will continue to deliver against this obligation in its collaborative work with local authorities.</p> <p>National Highways is producing a Wider Network Impacts Management and Monitoring Plan (WNIMMP) (7.12), which is currently being updated to take on board comments received to date - If the monitoring outputs from the monitoring plan identify issues/opportunities related to the road network as a result of traffic growth or new third party developments, local authorities will be able to use this as evidence within their intervention case making.</p> <p>The WNIMMP (7.12) will provide clarity on the</p>		

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			proposition, including the expectations on funding streams.		
Road Asset Maintenance	2.1.59 [GRAVESHAM-#0871]	Gravesham Borough Council note that Kent County Council has concerns over the physical impact of the construction traffic on the local road network, and that various physical works and maintenance may be needed to prior to commencement of construction to provide a robust network for use.	National Highways continues to engage with Kent County Council to agree an appropriate approach to monitoring and mitigating potential effects. National Highways agrees with the principle of mitigating significant adverse effects related to the Project, and considers that joint inspections are a good way forward. The details of the approach will be agreed subject to Kent County Council's programme / plan of capital works. Kent County Council and National Highways are collaborating on an approach to identifying where routes that the project will use for its construction logistics may be known to require short to medium term asset maintenance activity, and to bring forward a method to deliver works where practicable.	N/A	Matter Under Discussion
Monitoring of Wider Network Impacts	2.1.60 [GRAVESHAM-#0912]	Gravesham Borough Council notes the content of the Wider Network Impacts	During construction, the oTMPfC (7.14) sets out that monitoring will be in place to	Wider Network Impacts Management	Matter Under Discussion

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		<p>Management and Monitoring Plan in relation to traffic monitoring after the opening of the Lower Thames Crossing, but considers that a strategy needs to be in place during the construction period and after opening covering all areas of potential impact, along with indicative actions that might be taken to remedy any impacts that are larger than expected, or possibly unforeseen.</p>	<p>capture real-time data that provides confirmation that traffic and vehicle control measures are effective, and vehicle arrival and departure times from compounds are controlled. A Monitoring Report will be provided to the TMF. This report will be based on traffic monitoring measures such as automatic number plate recognition, traffic flow monitors and possibly web-based camera systems. Actual monitoring to be implemented will be selected as part of the TMP on a case-by-case basis, by road or section.</p> <p>The Contractor will support interventions and/or changes to traffic management measures required to ensure that disruption.</p> <p>During operation, a Wider Network Impacts Management and Monitoring Plan (WNIMMP) (7.12) will be implemented.</p> <p>If the monitoring outputs from the monitoring plan identify issues/opportunities related to the road network as a result of traffic growth or new third party</p>	<p>and Monitoring Plan (WNIMMP) (7.12) Outline Traffic Management Plan for Construction (oTMPfC) (7.14)</p>	

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			<p>developments, local authorities will be able to use this as evidence within their intervention case making.</p> <p>The WNIMMP will provide clarity on the proposition, including the expectations on funding streams.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the finalised WNIMMP and oTMPfC as part of the application materials.</p>		
EIA Methodology					
Comprehensive Monitoring Strategy	2.1.61 [GRAVESHAM-#0549] [GRAVESHAM-#0589]	Gravesham Borough Council consider that engagement is required on the process and funding needed to monitor and react to effects through a comprehensive monitoring strategy across all topic areas to validate the EIA is correct and flag (if impacts do occur) what might be done to address any issues that arise.	National Highways agrees that an effective and proportionate approach to monitoring and mitigation is critical. National Highways has outlined Enforcement and Control Procedures in outlined in the CoCP (6.3) which explains that the environmental management plan (EMP2) will set out the arrangements and responsibilities for implementing, monitoring, auditing and enforcing the environmental mitigation.	Code of Construction Practice (CoCP) (6.3) outline Landscape and Ecology Management Plan (oLEMP) (6.7) Register of Environmental Actions and Commitments (REAC) (6.3)	Matter Under Discussion

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			<p>The oLEMP (6.7) outlines the basis for monitoring requirements for land planted for landscaping and habitat provision to ensure attainment of agreed success measures. Monitoring requirements in relation for specific environmental topics e.g. for air quality, noise, protected species, ground water, etc are presented as individual commitments within the REAC (6.3) where the need for this is identified in the ES (6.1) to mitigate potential significant adverse effects.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application documents.</p> <p>Any requests for appropriate funding and governance under S 106 Agreements will be considered by National Highways on receipt.</p>		
Comprehensive and Interactive Mitigation Strategy (LVIA, Biodiversity,	2.1.62 [GRAVESHAM-#0553]	Gravesham Borough Council is concerned about impacts on the Kent Downs AONB from the widened A2, with the loss of the central	National Highways agrees that a comprehensive and interactive mitigation strategy is needed. A full assessment has been set out within the ES (6.1)	Transport Assessment (7.9) Register of Environmental Actions	Matter Under Discussion

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Historic Environment)		reservation, noting that there are complex interactions between the landscape, biodiversity and historic features in this area, which require a comprehensive mitigation strategy.	and Transport Assessment (7.9), with mitigation set out in each topic-specific chapter and secured in the REAC (6.3) and CoCP (6.3). National Highways has assessed the complex interactions between the Project, landscape, biodiversity and historic features in the area, and these are brought together in the Environmental Masterplan (6.2). The Design Principles document (7.5) sets out area-specific design principles, including principles for the A2/M2 corridor with reference to the AONB. This matter remains under discussion subject to Gravesham Borough Council's review of the application documents.	and Commitments (REAC) (6.3) Code of Construction Practice (CoCP) (6.3) Design Principles (7.5) Environmental Masterplan (6.2)	
Approach to EIA Regulations and DMRB	2.1.63 [GRAVESHAM-#0570] [GRAVESHAM-#0843]	Gravesham Borough Council cite PINS s.51 advice note from 18 March 2021 which says, " <i>DMRB guidance does not constitute policy or law. Developers / applicants should be able to answer</i>	National Highways agree that the EIA regulations represent the law which has been followed in the development of the ES (6.1). National Highways have adopted the DMRB as a	N/A	Matter Under Discussion

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		<p><i>questions about the particular anticipated effects of the Proposed Development, and the methodologies of assessment undertaken in the ES – and not solely rely on referring back to DMRB guidance”. It goes on to say, “the assessment should with professional judgement fit the Proposed Development – the relevant EIA Regulations are what should be applied to the content of an ES”.</i></p> <p>Gravesham Borough Council is concerned that this approach needs to be reflected in the application material.</p>	<p>standard for assessments to ensure transparency and consistency.</p> <p>The ES (6.1) takes account of other relevant professional guidance to inform its thresholds and interpretation of likely significant effects, and does not solely rely on DMRB.</p> <p>This matter remains under discussion subject to Gravesham Borough Council’s review of the application documents.</p>		
Assessment of Impacts on the AONB	2.1.64 [GRAVESHAM-#0583]	Gravesham Borough Council considers that the Project needs to address the major impact on the Kent Downs AONB in landscape, heritage and biodiversity terms.	National Highways has considered the assessment of effects on the Kent Downs AONB robustly within the ES Chapters 6 (Cultural Heritage), 7 (Landscape) and 8 (Terrestrial Biodiversity) (6.1) and will continue to engage on mitigation and compensation measures.	ES Chapters 6, 7 and 8 (6.1) Environmental Masterplan (6.2) outline Landscape and Ecology Management Plan (oLEMP) (6.7) Design Principles (7.5)	Matter Under Discussion

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			<p>Mitigation is detailed in the Environmental Masterplan (EMP) (6.2) which shows features such as proposed false cuttings, green bridges and planting proposed within the AONB and its setting, the oLEMP (6.7) and in the Design Principles for the Project (7.5) which contain the planting palettes, indicative species mixes and ongoing management and monitoring requirements associated with areas of landscape and ecological planting.</p> <p>Discussions regarding the remaining residual impacts to the AONB (i.e. those not able to be fully addressed by the mitigation for the Project) are ongoing with the AONB Unit and Natural England, giving consideration to the impact of the Project on the quality and character of this nationally important area.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application documents and the outcome of</p>		

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			engagement with the KD AONB and Natural England.		
Impacts on Landscape during Construction	2.1.65 [GRAVESHAM-#0766] [GRAVESHAM-#0767] [GRAVESHAM-#0773] [GRAVESHAM-#0810]	Gravesham Borough Council consider that assessments should consider the setting of retained features, and had been concerned that documents provided at Community Impacts Consultation did not adequately deal with impacts on landscape character during construction. Gravesham Borough Council agree that construction compounds should not be within the AONB or have a negative impact on its setting, with particular concern around Park Pale ULH.	National Highways is comfortable that the setting of heritage assets has been considered appropriately and mitigation measures set out to reduce the impact has been proposed – within Chapter 6: Cultural Heritage of the ES (6.1). Further mitigation is provided in a range of control documents, notably the REAC (6.3), the oLEMP (6.7), the Environmental Masterplan (6.2) and the Design Principles (7.5). A full assessment of the effects of the Project on landscape and visual amenity will be included in Chapter 7 of the ES (6.1), undertaken in accordance with best practice guidance. The location of the Park Pale ULH is limited to where utility works must be carried out. Discussions regarding the remaining residual impacts to the AONB (i.e. those not able to be fully addressed by the mitigation for the Project) are ongoing with the AONB Unit	ES Chapter 6 and 7 (6.1) Environmental Masterplan (6.2) outline Landscape and Ecology Management Plan (oLEMP) (6.7) Design Principles (7.5) Register of Environmental Actions and Commitments (REAC) (6.3)	Matter Under Discussion

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			<p>and Natural England, giving consideration to the impact of the Project on the quality and character of this nationally important area.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application documents.</p>		
Consideration of Operational Impacts	2.1.66 [GRAVESHAM-#0779]	Gravesham Borough Council is concerned that landscape impacts along the A2/M2 corridor in terms of the effect on the AONB were played down in Community Impact Consultation materials.	<p>National Highways note that the Operations Update (July 2021 Community impacts consultation) provides a brief overview of the landscape impacts of the Project only.</p> <p>A more detailed landscape and visual impact assessment of the Project along the M2/A2 corridor is set out in ES Chapter 7 (6.1) and necessary mitigation is provided in a range of control documents, notably the REAC (6.3), the oLEMP (6.7), the Environmental Masterplan (6.2) and the Design Principles (7.5).</p> <p>Discussions regarding the remaining residual impacts to the AONB (i.e. those not able to be fully addressed by the mitigation for the Project) are ongoing with the AONB Unit</p>	<p>ES Chapter 7 (6.1) Register of Environmental Actions and Commitments (REAC) (6.3) outline Landscape and Ecology Management Plan (oLEMP) (6.7) Environmental Masterplan (6.2) Design Principles (7.5)</p>	Matter Under Discussion

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			<p>and Natural England, giving consideration to the impact of the Project on the quality and character of this nationally important area.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application documents.</p>		
Cumulative, In-Combination Impacts on Local Communities	<p>2.1.67 [GRAVESHAM-#0792] [GRAVESHAM-#0799]</p>	<p>Gravesham Borough Council is concerned that the Community Impacts Consultation identified substantial and multiple environmental effects on places and residents of Westcourt and Riverview Wards but propose limited mitigation, and in particular a lack of detail on how the completed works will be screened.</p>	<p>A full assessment of effects per environmental topic, and cumulative effects, is set out in the ES Chapters 5 to 16 (6.1). Effects on health and equality from these environmental effects are considered in the HEqIA (7.10).</p> <p>All mitigation measures are presented in a range of control documents most notably the Design Principles (7.5), REAC (6.3), CoCP (6.3), FCTP (7.13) and oTMPfC (7.14). The REAC, specifically, presents good practice mitigation related to all ES topics including air quality, noise and amenity impacts. It also presents a framework for dealing with potential exceedances. Draft versions of these documents were provided</p>	<p>ES Chapters 5 to 16 (6.1) Health and Equality Impact Assessment (HEqIA) (7.10) Register of Environmental Actions and Commitments (REAC) (6.3) Code of Construction Practice (CoCP) (6.3) Design Principles (7.5) Framework Construction Travel Plan (FCTP) (7.13) Outline Traffic Management Plan for Construction (oTMPfC) (7.14)</p>	Matter Under Discussion

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			<p>at Community Impacts Consultation.</p> <p>Further detailed responses on issues relating to assessment of effects of the proposed infiltration ponds, and details of proposed screening, have been provided to Gravesham Borough Council following Community Impacts Consultation.</p> <p>Effects on specific locations are summarised in the Community Impact Report (7.16).</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application documents.</p>	<p>Community Impact Report (7.16)</p>	
Land Reinstatement / Vegetation	2.1.68 [GRAVESHAM-#0808]	Gravesham Borough Council consider that the success criteria for Land Reinstatement should ensure that vegetation is replanted and successfully reinstated in as short a time as possible and this should be included in the REAC.	<p>National Highways has set out criteria for success for vegetation establishment are presented in the oLEMP (6.7) in-line with Gravesham Borough Council's recommendation.</p> <p>This remains under discussion subject to Gravesham Borough Council's review of the oLEMP (6.7) and REAC (6.3).</p>	<p>outline Landscape and Ecology Management Plan (oLEMP) (6.7)</p> <p>Register of Environmental Actions and Commitments (REAC) (6.3)</p>	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
Socio-economic					
Use of Local Labour	2.1.69 [GRAVESHAM-#0013]	Gravesham Borough Council consider that contractors should be required to use local labour whenever possible, including apprenticeships to provide a long-term legacy.	<p>National Highways has shared a Skills, Employment and Education (SEE) Strategy which sets out the Project’s ambition to support local labour progression, skills attainment, and pathways to sustainable employment.</p> <p>An updated draft of the SEE Strategy has been shared with Gravesham Borough Council in July 2022, and some measures are already being implemented (where practicable).</p> <p>The SEE Strategy (appended to the Section 106 Agreements - 7.3) includes a number of obligations on the Project and its contractors to promote apprenticeships, and generally achieve estimates for local recruitment.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the SEE Strategy and Section 106 Heads of Terms.</p>	SEE Strategy (appended to the Section 106 Agreements - 7.3)	Matter Under Discussion
Implementation of SEE Measures	2.1.70	Gravesham Borough Council consider that the construction jobs provided	It is agreed that construction jobs provided by the Project will be a major benefit if a proactive	SEE Strategy (appended to the	Matter Under Discussion

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	<p>[GRAVESHAM-#0578] [GRAVESHAM-#0947]</p>	<p>by the Project will be a major benefit, but only if a proactive strategy is implemented in good time. Gravesham Borough Council considers that the Project should commit to a skills and training hub in Gravesham.</p>	<p>strategy is implemented in good time, however the Project is still developing detail around the approach to skills and training hubs. This matter remains under discussion subject to further development of SEE provisions.</p>	<p>Section 106 Agreements - 7.3)</p>	
<p>Southern Valley Golf Course</p>	<p>2.1.71 [GRAVESHAM-#0035] [GRAVESHAM-#0904] [GRAVESHAM-#0187]</p>	<p>Gravesham Borough Council does not consider that the removal (without replacement) of Southern Valley Golf Course is justified in leisure terms (surplus to recreational requirements) in-line with NSPNN Para 5.166.</p>	<p>National Highways notes that Southern Valley Golf Course will cease operations in August 2022. National Highways proposes to replace the area with equivalent scale of space in the form of public open space (Chalk Park which will be accessible and improve connectivity across the area and provide a recreational asset that is currently deficient in the area). National Highways will provide further information as part of the updated Planning Statement (Appendix D) (7.2) and this remains a matter under discussion until this is shared with Gravesham Borough Council.</p>	<p>Planning Statement (7.2)</p>	<p>Matter Under Discussion</p>

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
SWCP Access	2.1.72 [GRAVESHAM- #0806]	Gravesham Borough Council is concerned that closure of Brewers Road Bridge for 19 months would reduce access to SWCP and therefore impact on its visitor numbers and income.	National Highways recognises that Brewers Road will be closed for a period of likely between 16-19 months, and this is necessary in order to demolish the existing structure and construct the new Green Bridge which is considered a positive measure and one agreed upon with Gravesham Borough Council. More information is provided in the oTMPfC (7.14) on the justification for this closure. The oTMPfC (7.14) sets out that there would be an increase in journey times (around 6 mins) due to the closure and diversion (via Three Crutches roundabout), but that access would be maintained through illustrative diversion routes, which are subject to refinement on engagement with relevant authorities (as other factors may need to be taken into account, such as other works in the nearby area at the time of closure). The main access to the Country Park would not be impacted, and direct access to the site from the central carpark within the Country Park would be	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Not Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			retained. It is considered that the proposals for replacement open space and additional links between isolated parcels of woodland would add benefits to the wider community and Shorne Wood Country Park users, with re-provided land being more accessible by PRow.		
Effects on Cascades Leisure Centre	2.1.73 [GRAVESHAM-#0187] [GRAVESHAM-#0286] [GRAVESHAM-#0390] [GRAVESHAM-#0395] [GRAVESHAM-#0397] [GRAVESHAM-#0398]	Gravesham Borough Council is concerned that there would be detrimental environmental and traffic/access impacts on the users of sport and leisure facilities at Cascades, and its viability due to change in operations at Cascades as a result of the Project.	National Highways does not consider that the Project is likely to result in significant adverse effects to the operation of Cascades Leisure Centre in terms of commercial viability, or environmental effects on users of facilities – there are no significant effects and no mitigation required in this area. The latest air quality assessment is yet to be completed. However, based on earlier data from the community impacts consultation, the assessment of receptors in this area (not specifically Cascades) found no significant effects in terms of air quality or health. Where there may be temporary changes to land or amenity of land, the CoCP (6.3) covers	Code of Construction Practice (CoCP) (6.3)	Matter Not Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			potential mitigation for example related to protection of existing infrastructure and buildings, and worksite security).		
Community Fund (Principle)	2.1.74	Gravesham Borough Council consider that a Community Fund should be provided and secured by S 106 Agreement.	It is agreed that a Community Fund will be provided and secured by a S 106 Agreement and this has been included within the S 106 Heads of Terms within the DCO Application (7.3).	S 106 Heads of Terms (7.3)	Matter Agreed
Community Fund (Criteria)	2.1.75	Gravesham Borough Council consider that the Community Fund should fund and facilitate community and environmental enhancement projects within a certain distance of the Project, and include criteria for environmental enhancement projects should include historic landscapes and heritage assets as well as the natural environment.	National Highways has provided draft Terms of Reference for the Section 106 Agreement and await Gravesham Borough Council comments in order to reach agreement on the proposed criteria for the Community Fund, which does not exclude those suggested by Gravesham Borough Council but sets out additional parameters for the Funds.	S 106 Heads of Terms (7.3)	Matter Under Discussion
Community Fund (Scale)	2.1.76	Gravesham Borough Council and National Highways are undertaking discussions to agree the	National Highways has provided draft Terms of Reference for the Section 106 Agreement and await Gravesham Borough	S 106 Heads of Terms (7.3)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		scale of proposed Community Funds.	Council comments in order to reach agreement.		
Community Fund (Implementation and Governance)	2.1.77	Gravesham Borough Council and National Highways are undertaking discussions to agree the implementation and governance of proposed Community Funds.	National Highways has provided draft Terms of Reference for the Section 106 Agreement and await Gravesham Borough Council comments in order to reach agreement.	S 106 Heads of Terms (7.3)	Matter Under Discussion
Air Quality					
Methodology: Air Quality, General (PEIR)	2.1.78 [GRAVESHAM-#0057] [GRAVESHAM-#0156]	Gravesham Borough Council consider that analysis of air quality should be based on the latest version of the Emissions Factor Toolkit (or alternative / updated as relevant) to ensure that its use still represents a conservative approach.	National Highways can confirm that the latest Emission Factor Toolkit (which is incorporated into the speed band emissions) has been used for the assessment in ES Chapter 5 (6.1). The approach used by the Project is more pessimistic than utilising only Defra tools, as the gap analysis factors applied uplift the modelled concentrations (sometimes by a substantial margin). This matter remains under discussion subject to Gravesham Borough Council's consultants considering proposed approach and implication for monitoring.	ES Chapter 5 (6.1)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
Methodology: Assessment of PM 2.5	2.1.79 [GRAVESHAM-#0057] [GRAVESHAM-#0159] [GRAVESHAM-#0547] [GRAVESHAM-#0625] [GRAVESHAM-#0643] [GRAVESHAM-#0649] [GRAVESHAM-#0855]	Gravesham Borough Council is concerned that the assessment of Air Quality effects does not include appropriate monitoring, modelling or assessment of PM2.5 concentrations in-line with the Public Health Outcomes Framework.	National Highways consider that ES Chapter 5 (6.1) appropriately assesses the impact from both PM10 and PM2.5. PM10 has been modelled using road traffic emissions factors and Defra background pollution maps. All road traffic-related PM10 is equivalent to PM2.5, which is a worst-case assumption given that PM2.5 typically makes up less than 70% of PM10. The concentrations predicted have been based on up-to-date modelling, and assessed against national air quality objectives and limit values.	ES Chapter 5 (6.1)	Matter Not Agreed
Mitigation: Air quality Management and Monitoring	2.1.80 [GRAVESHAM-#0550] [GRAVESHAM-#0363]	Gravesham Borough Council consider that monitoring should be continued indefinitely after the opening year. Gravesham Borough Council consider that a section 106 agreement would secure additional controls, including funding of post(s) to monitor air quality, respond to requests, investigate	Subject to detailed arrangements, proposed pre-construction monitoring equipment may remain post-opening for Gravesham Borough Council's use. National Highways is considering requests from Gravesham Borough Council related to S 106 funding for monitoring and enforcement but primarily these controls will be	Register of Environmental Actions and Commitments (REAC) (6.3) Code of Construction Practice (CoCP) (6.3)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		potential breaches and support on other matters during the construction process and the initial phases or operation.	secured via the REAC (6.3) and CoCP (6.3). This matter remains under discussion subject to Gravesham Borough Council's review of application materials, and development of a Section 106 Agreement.		
Cultural Heritage					
Methodology: Archaeological investigation	2.1.81 [GRAVESHAM-#0863]	Gravesham Borough Council note that archaeological investigation which has discovered some below surface features might result in some limited adjustments to ancillary aspects of the Project.	National Highways has set out all the significant impacts on heritage assets and their mitigation within Chapter 6 of the Environmental Statement (6.1) and the Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (ES Appendix 6.9) (6.3). National Highways has amended the Project in areas subject to appropriate thresholds. This matter remains under discussion as Gravesham Borough Council will consult with Kent County Council.	ES Chapter 6 (6.1) Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (ES Appendix 6.9) (6.3)	Matter Under Discussion
Impacts: Setting of Heritage Assets	2.1.82 [GRAVESHAM-#0558] [GRAVESHAM-#0652]	Gravesham Borough Council considers that National Highways assessment during (Community Impacts) Consultation that the “ <i>built</i>	National Highways has reviewed the wording of the relevant ward summary and made necessary amendments to reflect accurate position. This is reflected in the DCO	ES Chapter 6 (6.1)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		<p><i>project is unlikely to change the setting of any heritage assets</i>” is incorrect – considering that there is a major impact on heritage assets, particularly on the village of Thong and its conservation area.</p>	<p>submission at ES Chapter 6 (6.1). This matter remains under discussion subject to Gravesham Borough Council’s review of the ES.</p>		
<p>Impacts: Landscape / Historic Character</p>	<p>2.1.83 [GRAVESHAM-#0704]</p>	<p>Gravesham Borough Council considers that the proposals for Project pay limited regard to historic landscapes in the Cobham/Shorne area. Gravesham Borough Council consider that Landscape Character and Historic Characterisation should be afforded greater priority in the list of design principles, and a re-evaluation of the impact of the project on landscape and historic character may be necessary to prevent a piecemeal approach and a loss of ‘character’.</p>	<p>National Highways consider that the landscape design will protect views across historic landscape and topography and will be influenced by historic features, land use, patterns and boundaries but there are some areas where the historic landscape has already been significantly compromised, such as around the A2 corridor, and in these areas it would not be possible to take it into account given the scale of existing change. In these areas the intention is to provide a landscape design that most effectively screens the additional infrastructure that would be introduced by the Project to avoid or reduce impacts to heritage assets (and other receptors) in the surrounding area.</p>	<p>Design Principles (7.5) ES Chapter 6 (6.1)</p>	<p>Matter Under Discussion</p>

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			This matter remains under discussion subject to Gravesham Borough Council review of application documents including Design Principles (7.5) and ES Chapter 6 (6.1).		
Mitigation: Cultural Heritage Mitigation Strategy	2.1.84 [GRAVESHAM-#0864]	Gravesham Borough Council consider that the impact on the village of Thong (with its Conservation area) and the overall setting of Cobham Park will be significantly impacted, as well as any direct physical impacts from construction of the Project, and that an integrated approach needs to be taken to fully appraise the impacts and produce a comprehensive and sensitive strategy for this area across landscape, biodiversity and historic impacts, rather than prioritising engineering.	National Highways is content that the ES Chapter 6 (6.1) appropriately considers the likely significant effects and propose mitigation for each. Where physical embedded mitigation is proposed, it is integrated into the design of the Project and considered as such by the EIA in reaching its conclusion – so has evolved in such a way to reduce all environmental effects in an integrated way. This matter remains under discussion subject to Gravesham Borough Council's review of the ES Chapter 6 (6.1), REAC (6.3) and Design Principles (7.5).	ES Chapter 6 (6.1) Register of Environmental Actions and Commitments (REAC) (6.3) Design Principles (7.5)	Matter Under Discussion
Landscape and Visual					
Effects on the setting of the AONB	2.1.85 [GRAVESHAM-#0083]	Gravesham Borough Council is concerned that the selection of the route has serious implications for	National Highways acknowledge that there would be some unavoidable loss of existing vegetation, along the	ES Chapter 7 (6.1)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
	<p>[GRAVESHAM-#0231] [GRAVESHAM-#0724]</p>	<p>the Kent Downs Area of Outstanding Natural Beauty (KDAONB), including: The effects on views which are part of the cultural heritage; and The erosion of landscape and visual quality due to a change in the nature of the landscape to a hard-edged and urban environment, out of scale with the existing landscape and stripped of screening vegetation.</p>	<p>A2 corridor, however, a landscape strip would be maintained between the widened A2 and HS1 and replacement planting would be undertaken wherever practicable. National Highways consider that the provision of two green bridges crossing the A2 along Brewers Road and Thong Lane would help to further reduce the urban character of the widened A2 corridor Potential impacts to views that are relevant to cultural heritage have been assessed through viewpoint photography and in some cases photomontages. This is documented in the ES Chapter 7 (6.1) This remains a matter under discussion subject to Gravesham Borough Council review of application material.</p>		
Principle to Retain Planting	2.1.86 [GRAVESHAM-#0724]	Gravesham Borough Council consider that National Highways should retain as much planting as possible along the A2/M2 corridor in order to retain essential screening and	National Highways agrees with this principle - as stated in Design Principle S1.01 (Design Principles (7.5)), existing planting along the northern edge of the A2 corridor and south of the A2 shall be retained	Design Principles (7.5)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		continuity of planting in - and in the setting of the AONB.	as far as reasonably practicable. This matter remains under discussion pending Gravesham Borough Council's review of the securing mechanisms for Design Principles.		
Severance of the AONB	2.1.87 [GRAVESHAM-#0231]	Gravesham Borough Council is concerned about the proposed severance of the northern part of the Kent Downs AONB along the widened A2 corridor and A2/LTC junction, including removal of central reservation from the A2 along this section. Gravesham Borough Council consider that the experience of walkers, riders and cyclists crossing the newly widened road corridor will be significantly affected by the proposal.	National Highways notes that the Kent Downs AONB is already severed by the existing A2 corridor, but that the two proposed green bridges along Brewers Road and Thong Lane would help reduce this severance by enhancing connectivity across the A2 corridor for recreational use and wildlife. National Highways considers that the experience of walkers, riders and cyclists crossing the newly widened road corridor would be enhanced by the proposed green bridges.	N/A	Matter Not Agreed
Visual Intrusion of the A2/LTC Junction	2.1.88 [GRAVESHAM-#0147] [GRAVESHAM-#0382]	Gravesham Borough Council consider that the size, massing, design elements and siting of the A2/LTC junction, and its proposed cuttings, is out of scale and character with the	National Highways note that extensive woodland planting is proposed adjoining the eastern edge of Gravesend in the vicinity of the proposed A2/LTC junction, and no landscape	ES Chapter 7 (6.1)	Matter Not Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
	[GRAVESHAM-#0804] [GRAVESHAM-#0981]	<p>surrounding AONB landscape.</p> <p>Gravesham Borough Council is concerned that consultation documents have not provided appropriate visual imagery showing the size, height and mass of the A2/LTC junction and associated road infrastructure, from the users' viewpoints.</p> <p>Gravesham Borough Council note that planting trees around the main junction will help to soften its visual impact, but should be close to the communities affected, and may require some consideration of landscape treatment outside of the red line boundary/order limits.</p>	<p>treatment is proposed outside the Order Limits.</p> <p>Proposed false cuttings and extensive woodland planting would soften the appearance of the A2/LTC junction and help integrate the junction into the landscape.</p> <p>National Highways is content that mitigation including proposed false cuttings and extensive woodland planting would soften the appearance of the A2/LTC junction and help integrate the junction into the landscape.</p> <p>The Project design has evolved throughout stages of consultation, and the assessment in ES Chapter 7 (6.1) has been updated accordingly.</p> <p>National Highways is content that adequate material has been shared through consultation to give people an appropriate sense of the size, height and mass of the A2/LTC junction.</p>		
Loss of Central Reservation	2.1.89 [GRAVESHAM-#0257]	Gravesham Borough Council consider that narrowing of M2/A2 lanes	National Highways considers that the visual effects of the A2 widening in views from the east	N/A	Matter Not Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
	<p>[GRAVESHAM-#0361] [GRAVESHAM-#0724]</p>	<p>and loss of the vegetated central reservation will have a significant impact on the landscape and views from the east, increasing the urbanisation of this stretch of the Kent Downs AONB and the severance of the woodlands north and south of the A2.</p>	<p>would be negligible and there would little visual impact in views from the south, given the retention of existing trees and woodland adjoining HS1.</p> <p>National Highways notes that the woodlands north and south of the A2 are already severed by the existing A2 corridor.</p> <p>National Highways considers that retention of the existing central reservation planting would result in further vegetation removal to the north of the road corridor, to accommodate the required width of widening.</p> <p>After careful consideration, it was therefore considered preferable to remove the central reservation planting rather than impact further impact on woodland to the north, including designated woodland.</p>		
Loss of HS1 Landscaping	2.1.90 [GRAVESHAM-#0361]	<p>Gravesham Borough Council considers that the entire corridor, including HS1, needs to be treated as a whole.</p> <p>Gravesham Borough Council considers that</p>	<p>National Highways acknowledges that there would be some unavoidable loss of existing vegetation, along the A2 corridor, however, a landscape strip would be maintained between the widened A2 and HS1 and</p>	N/A	Matter Not Agreed

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		<p>National Highways needs to address the loss of HS1 landscaping and consider widening the corridor on the north side.</p> <p>Gravesham Borough Council consider that under the proposed Project, the transport corridor would become far more urban in character and much of this landscaping would be lost.</p>	<p>replacement planting would be undertaken wherever practicable.</p> <p>National Highways considers it preferable to remove the central reservation planting rather than impact further impact on woodland to the north, including designated woodland.</p>		
Visual Effects of the Approach to South Portal	<p>2.1.91 [GRAVESHAM-#0147] [GRAVESHAM-#0083]</p>	<p>Gravesham Borough Council is concerned that the approach road to the southern tunnel portal would be in deep cutting from Thong Lane northwards, which would be an intrusive and jarring feature in the local landscape.</p>	<p>National Highways note that the cutting leading up to Thong Lane is shown on the Environmental Masterplan (6.2) as LE 1.4 (rock and scree), where natural colonisation would be encouraged on the chalk face, to visually soften the bare faces of the chalk cutting. Outline management requirements are set out in the oLEMP (6.7).</p> <p>Tunnel portal buildings would be located in deep cutting and would not therefore be visible from the surrounding landscape. This remains a matter under discussion subject to</p>	<p>outline Landscape and Ecology Management Plan (oLEMP) (6.7) Environmental Masterplan (6.2)</p>	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			Gravesham Borough Council review of application material.		
Road/Landscape Integration	2.1.92 [GRAVESHAM-#0700] [GRAVESHAM-#0747] [GRAVESHAM-#0787]	<p>Gravesham Borough Council is concerned about the Project leading to a piecemeal approach to the issue of integrating the scheme into the landscape rather than a more strategic approach to analysing and re-appraising the landscape character.</p> <p>Gravesham Borough Council consider that introducing different landforms and planting results in a landscape with little cohesion, with some references to past land uses.</p> <p>Gravesham Borough Council agree in principle to LSP.03, but consider that using planting as a means of screening (which may not 'fit' in the landscape), needs to be implemented carefully and appropriately.</p>	<p>National Highways note that, as stated in Design Principle (7.5) LSP.03, the earthworks shall be graded into the wider landscape as appropriate to the context and shall respect the local topography and landscape character where reasonably practicable.</p> <p>Planting would therefore be used, if required, to provide further visual softening of earthworks to help integrate the Project into the landscape.</p> <p>The location of proposed planting is shown on the Environmental Masterplan (6.2), which provides comprehensive proposals for the whole Project, rather than a piecemeal approach and has regard to the character of the existing landscape.</p> <p>The detailed design shall use planting to soften the edge of the earthworks and integrate the Project as defined in the Environmental Masterplan (6.2).</p> <p>This remains a matter under discussion subject to Gravesham</p>	Design Principles (7.5) Environmental Masterplan (6.2)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			Borough Council review of application material.		
Woodland North of A2 Corridor	2.1.93 [GRAVESHAM-#0722]	Gravesham Borough Council consider that for woodland north of A2 Corridor, there is a need to preserve views and enhance setting and extend/reinforce the woodland landscape where appropriate.	National Highways agrees with the need to preserve views and enhance setting and extend/reinforce the woodland landscape where appropriate - where tree loss is unavoidable, landscape proposals shall maximise reinstatement of woodland within the A2 corridor as defined in the Environmental Masterplan (6.2). This matter remains under discussion subject to Gravesham Borough Council's review of the application documents including the Environmental Masterplan (6.2) and Design Principles (7.5) and their detail on the type of planting, its ecological potential and relationship to existing habitat, appropriate type of landscape and access routes (where appropriate).	Environmental Masterplan (6.2) Design Principles (7.5)	Matter Under Discussion
Setting of Thong Village	2.1.94 [GRAVESHAM-#0738] [GRAVESHAM-#0899]	Gravesham Borough Council consider that the Project is bringing about a significant landscape change, and this requires a creative approach to	National Highways considers that the landscape design around Thong aims to balance mitigating impacts of the Project	N/A	Matter Not Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		<p>landscape in order to ensure that Thong retains its character, while also providing adequate screening to reduce the noise and visual intrusion of the Project.</p> <p>Gravesham Borough Council considers that some planting areas should be considered – potentially close to the village – and that there is a need to balance shielding the settlement from the new road with the maintenance of its historic setting as part of the Darnley Estate.</p>	<p>with retaining an open setting to the west of Thong village.</p> <p>This has taken into account the setting of the conservation area and, where possible, sought to preserve the aspects of its setting that contribute to the significance of the conservation area. However, given the scale of the A2 junction the intention is to provide a landscape design that most effectively screens the additional infrastructure of the junction that would be introduced by the Project, to reduce impacts to Thong from this direction.</p>		
Views from Thong Village	2.1.95 [GRAVESHAM-#0787]	<p>Gravesham Borough Council is concerned that the Operations Update Document published for Community Impacts Consultation (July 2021) show optimistic and possibly misleading views from Thong village looking south-west, and suggest that the junction is likely to be visible.</p>	<p>National Highways consider that the images are taken from a photomontage prepared from a Public Right of Way on the edge of Thong village and are consider that they are an accurate portrayal of the Project from this viewpoint.</p> <p>The illustrations show the top of lighting columns and signage visible on the junction before woodland planting mitigation on the false cutting establishes.</p>	N/A	Matter Not Agreed

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Chalk Park	2.1.96 [GRAVESHAM-#0785] [GRAVESHAM-#0931] [GRAVESHAM-#0747] [GRAVESHAM-#0787]	<p>Gravesham Borough Council is concerned that the design and layout of this new open space at Chalk Park should be developed in close liaison with Gravesham Borough Council and local communities.</p> <p>Gravesham Borough Council is disappointed that such a large and extensive construction compound is required in this area, as Gravesham Borough Council consider that early structure planting for the new park would help to establish the site.</p> <p>Gravesham Borough Council also raise concern that the design of the surrounding Chalk Park is supposed to mimic the open fields with wooded heights found in the Shorne/Cobham Wood's area, but this landscape feature is however on a much larger scale than Chalk Park.</p>	<p>Proposals for a cohesive landscape design, including the proposed Chalk Park, are shown on the Environmental Masterplan (6.2) - Sections 3, 4 and 5, including the proposed Chalk Park takes into consideration landscape, biodiversity, cultural heritage, access and recreation issues.</p> <p>As stated in Design Principles (7.5) at LSP.03, the earthworks shall be graded into the wider landscape as appropriate for its context and shall respect the local topography and landscape character where reasonably practicable. The detailed design shall use planting to soften the edge of the earthworks and integrate the Project as defined in the Environmental Masterplan.</p> <p>Design Principle LSP.23 identifies that where reasonably practicable, planting shall be undertaken early in the construction programme to maximise the maturity of the planting scheme at road opening.</p>	Environmental Masterplan (6.2) Design Principles (7.5)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		<p>Gravesham Borough Council consider that an appraisal of the whole area would consider the landscape in the context of its rich heritage, biodiversity and access interests, and provide a more strategic response to the introduction of the Project into the landscape.</p>			
Shorne lfield Road	<p>2.1.97 [GRAVESHAM-#0971] [GRAVESHAM-#0972]</p>	<p>Gravesham Borough Council note that at Local Refinement Consultation, National Highways proposed to move an area of planting north of Shorne lfield Road to the south.</p> <p>Gravesham Borough Council is concerned that the boundary of this site may appear artificial, and consider that the inclusion of an area of land to the immediate east of the land parcel would enable a link to SSSI land on its eastern and southern boundaries.</p> <p>Gravesham Borough Council is concerned that the proposal for woodland at this location would block</p>	<p>National Highways recognise Gravesham Borough Council's consideration that additional planting (over and above the quantum identified as needed to compensate for loss of ancient woodland) would provide additional connectivity to the SSSI to the east and south of the site proposed by Gravesham.</p> <p>While it is agreed that this would benefit connectivity to the SSSI, National Highways considers that the site chosen would improve the woodland link between the Thong Lane Green Bridge and the woodlands within the Site of Special Scientific Interest (SSSI) and Shorne Woods Country Park</p>	<p>Design Principles (7.5) outline Landscape and Ecology Management Plan (oLEMP) (6.7)</p> <p>Register of Environmental Actions and Commitments (REAC) (6.3)</p>	<p>Matter Under Discussion</p>

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		valuable views across the Thames.	<p>compared with present arrangements, compensate for the effect of loss of ancient woodland, and avoid additional effects on views and archaeology.</p> <p>The landscape in this location is currently an agricultural field with a woodland edge, and National Highways considers that the proposed site would relate well to existing woodland in Shorne Woods Country Park and therefore achieve a fit with the existing landscape.</p> <p>National Highways has produced a number of relevant Design Principles (7.5), and is committed to the development of a LEMP, post DCO consent, to be developed in line with the controls and commitments in the oLEMP (6.7), Design Principles (7.5) and REAC (6.3), which refer to the approach to design and planting that respects natural environmental and landscape character.</p> <p>Gravesham Borough Council will be a consultee to the development of this document.</p>		

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			This matter remains under discussion subject to Gravesham Borough Council's review of the application documents.		
Remodelling of Tilbury Fields	2.1.98 [GRAVESHAM-#0940]	<p>Gravesham Borough Council note that Tilbury Fields is visible from Gravesham and sites in a generally flat landscape where the forts are main development on the riverside.</p> <p>Gravesham Borough Council is concerned that the proposals to introduce new landforms affect the Green Belt and the setting of the various forts and their sightlines.</p> <p>Gravesham Borough Council considers that this proposal may result in a significant change to local and long views, and consideration should be taken to re-assess the landscape and visual impacts.</p>	<p>National Highways notes Gravesham Borough Council's concerns but does not agree that changes would be significant or adverse.</p> <p>The design of proposed environmental mitigation has had regard to the historic character of the landscape, for example, LSP.07 of the Design Principles (7.5) states that to protect views across historic landscape and topography, the new landscape design will take account of local landscape character, respect historic features and reference historic land use, patterns and boundaries.</p> <p>National Highways has assessed the significance of any effect of the introduction of the proposed 24m landform at Tilbury Fields, with respect to views across the River Thames from Shornemead Fort and in the context of landscape and</p>	Design Principles (7.5) ES Chapter 7 (6.1)	Matter Not Agreed

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			views where considered relevant within Chapter 7 of the ES (Landscape and Visual) (6.1).		
Terrestrial Biodiversity					
Environmental Impact of LTC/A2/M2 Junction	2.1.99 [GRAVESHAM-#0144]	Gravesham Borough Council is concerned about the environmental impact of the new LTC/A2/M2 junction on the A2 corridor in terms of the loss of HS1 landscaping and effects on the Kent Downs AONB, effects on nature conservation and historic environment.	<p>National Highways has set out through the evolution of the design through Consultation how the junction has adapted in-line with DMRB standards where practicable.</p> <p>Additionally, National Highways has amended the width of the Thong Lane South green bridge to allow for additional planting. The design has sought to retain mature vegetation where possible and the is showing a reasonable worse case for vegetation loss.</p> <p>There are two Design Principles (7.5) that require contractors to maximise opportunities to retain vegetation and/or replant areas cleared so far as possible.</p> <p>More widely, larger areas of woodland planting have been provided to help offset these impacts along with those associated with habitat loss south of the A2.</p>	Design Principles (7.5)	Matter Under Discussion

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			<p>There are extensive areas of woodland planting proposed as part of the landscape design for the junction to help integrate the junction into the wider areas of woodland that line the A2 and this forms part of a wider regional strategy to provide a woodland loop encircling the junction.</p> <p>National Highways consider that the above represents the best available course of action to balance the need for the route with the potential for environmental harm to the AONB and natural and historic environment This matter remains under discussion subject to Gravesham Borough Council's review of the application documents.</p>		
Hedgerow Reinstatement	2.1.100 [GRAVESHAM-#0710]	<p>Gravesham Borough Council consider that hedgerow reinstatement needs to be sympathetic to the overall landscape and reinstate where possible historic boundaries.</p> <p>Gravesham Borough Council consider that some reappraisal of the</p>	<p>National Highways has developed Design Principle (7.5) LSP.13 which relates to the reinstatement of field boundaries with hedgerows, with the intention is to protect the local historic character of the landscape, provide additional screening and</p>	Design Principles (7.5)	Matter Under Discussion

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		<p>landscape is needed in areas where the project cannot be accommodated within the existing landscape character.</p>	<p>enhance biodiversity where reasonably practicable.</p> <p>The hedgerow planting around the southern portal has been designed to put back hedgerows that previously existed (to link up to fragments of retained hedgerows or to reinstate ones that are lost).</p> <p>Where National Highways can't re-establish hedgerows (e.g. due to utilities) footpaths have been used to delineate historic hedgerow locations instead so that there is still a linear feature in the landscape.</p> <p>This matter remains Under Discussion subject to Gravesham Borough Council's review of the Design Principles (7.5).</p>		
Marsh Restoration	2.1.101 [GRAVESHAM-#0911]	<p>Gravesham Borough Council consider that the marshes that National Highways will restore and manage to encourage use by birds (added at Community Impacts Consultation) should be expanded, made permanent, and include</p>	<p>National Highways has included three fields in the order limits to mitigate any temporary disturbance to wetland birds associated with the Special Protection Area (SPA) and Ramsar site from construction activities nearby.</p> <p>These areas will continue to be farmed during construction, with</p>	N/A	Matter Not Agreed

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		restoration of historic drainage patterns	<p>a cropping regime that ensures the presence of winter stubble for the benefit of wading birds.</p> <p>This is agreed with Natural England and the landowner.</p> <p>All functionally linked land associated with the relevant construction areas will be restored afterwards.</p> <p>National Highways does not consider that there is a requirement to provide permanent mitigation in this location.</p>		
Effects on existing habitat replacement (CTRL)	2.1.102 [GRAVESHAM-#0179]	Gravesham Borough Council is concerned that the Project will remove habitat replacement put in place under the CTRL Act (1996), which included the translocation of ancient woodland soils.	<p>National Highways' landscape design for woodland planting through the A2 corridor and around the LTC junction have sought to address the loss of Sites of Special Scientific Interest (SSSI) and ancient woodland impacted by the Project, including the areas of SSSI compensatory planting provided by HS1, by linking to areas of retained woodland and providing greater woodland connectivity for retained areas of woodland.</p> <p>South of the A2, areas of new planting have been limited by</p>	N/A	Matter Under Discussion

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			<p>the presence of designated woodlands and the Registered Park and Gardens and golf course.</p> <p>In light of that, National Highways is proposing compensatory woodland planting to the west of Jeskyns Country Park and will replant retained areas between LTC and HS1 where practicable.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of application materials.</p>		
Utility Diversion effects on Ancient Woodland and Planting	2.1.103 [GRAVESHAM-#0327] [GRAVESHAM-#0723] [GRAVESHAM-#0742] [GRAVESHAM-#0803] [GRAVESHAM-#0332]	Gravesham Borough Council is concerned that loss of Ancient Woodland cannot be mitigated, and that any loss of woodland or planting is unacceptable.	Throughout the Project development, the amount of land required by the Project for utility diversions has substantially decreased, resulting in a reduction in the loss of Ancient Woodland. Alternatives have been considered. There is a small amount of removal required, and while National Highways recognises that this cannot be mitigated, compensation has been identified and committed to. National Highways acknowledge the impact on irreplaceable habitats and are	Register of Environmental Actions and Commitments (REAC) (6.3) Code of Construction Practice (CoCP) (6.3) Design Principles (7.5)	Matter Under Discussion

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			<p>proposing compensatory habitat. Ancient woodland soils will be salvaged where possible for use in new areas of compensatory planting.</p> <p>The contractor will still be obliged to retain all existing vegetation as far as reasonably practicable as is set out in Clause no. LSP.01 of the REAC (6.3).</p> <p>The (CoCP/REAC (6.3)) and Design Principles (7.5) will commit the contractors to limit and mitigate their impact to areas such as Claylane Wood so far as reasonably possible and will be considered further at the detailed design stage.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of application documents.</p>		
Incremental Changes and Environmental Masterplan	2.1.104 [GRAVESHAM-#0917] [GRAVESHAM-#0980]	Gravesham Borough Council is concerned that incremental changes during the development of the Project has resulted in a lack of clarity on the integration of measures related to landscape,	The design rational and the iterative approach we have taken to developing the project design is detailed in the Project Design Report (7.4). The specific design for the project, including both the highways works and the landscape scale approach to	Project Design Report (7.4) Design Principles (7.5) outline Landscape and Ecology Management Plan (oLEMP) (6.7)	Matter Under Discussion

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		<p>ecology, management access, land viability, historic environment and maintenance.</p> <p>Gravesham Borough Council consider that this may warrant a re-evaluation of the (sum of) effects/impacts to the landscape character and visual amenity.</p> <p>Gravesham Borough Council consider that a masterplan approach to the whole area affected by the Project, south of the River Thames, would enable examination of the issues resulting from the Project and take a strategic approach to the development and integration of 'new' land parcels.</p>	<p>mitigation, is controlled via the Design Principles (7.5). The area-specific design principles reflect the various factors which have influenced the design (including but not limited to landscape, ecology, access, agriculture, archaeology etc. For areas of habitat creation success criteria and management objectives are included within the oLEMP (6.7). The responsibility for the long term management of sites within the DCO application lies with National Highways as the applicant. However, it is anticipated that National Highways will develop long term partnerships to manage these sites. This would be detailed through the development of Landscape and Ecology Management Plans with the contractors once the Project has been consented.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the application documents.</p>		
Environmental Management Plan / Group	2.1.105 [GRAVESHAM-#0918]	Gravesham Borough Council consider it desirable for National	National Highways is broadly in agreement with Gravesham Borough Council's proposal -	outline Landscape and Ecology Management Plan (oLEMP) (6.7)	Matter Agreed

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		<p>Highways to facilitate an overall management plan across the Cobham/Shorne area involving Plantlife, National Trust, Rochester and Cobham Park Golf Club, Cobham Hall School, Gravesham Borough Council, Woodland Trust, Forest England, and Kent County Council in order to obtain the best landscape, ecological, recreational and historic environment plans for the area and adopt a coordinated approach to land development and management.</p> <p>Gravesham Borough Council require a comprehensive environmental package covering all aspects of the proposal</p>	<p>the development and ongoing management of the Lower Thames Crossing sites will be conducted in line with the principles of an Advisory Group (set out in the oLEMP (6.7)) which will include statutory and non-statutory stakeholders. The intention of the advisory group is to shape the design and management of the sites through stakeholder input. This will include any of the project sites within the Cobham/Shorne area. It is anticipated that the advisory group will look collectively at sites within similar areas to ensure that high level landscape scale principles are applied in an appropriate manner which maximises the benefits. The proposed approach to this was included within the draft oLEMP shared at Community Impact Consultation.</p> <p>National Highways also notes that there is also a legacy and benefits biodiversity working group which is working with local stakeholders to identify projects that could benefit from</p>		

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			<p>National Highways Designated Funding.</p> <p>National Highways has confirmed funding for a programme of environmental and visitor focussed enhancements across the Cobham and Shorne area.</p> <p>Additionally Lower Thames Crossing is supporting Kent Downs AONB to develop a plan for achieving National Nature Reserve status and creating a further pipeline of projects that could be supported.</p>		
Noise and Vibration					
Effects at Southern Tunnel Compound / 24H Working	2.1.106 [GRAVESHAM-#0802]	Gravesham Borough Council is concerned that the effects related to noise from the Southern Tunnel Compound are underplayed, and 24-hour working will contribute to significant issues.	<p>It is not agreed that effects related to noise from the Southern Tunnel Compound are underplayed.</p> <p>Construction noise associated with the Project has been assessed in accordance with appropriate UK guidance on construction noise, BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites (parts 1 and 2); Chapter 12 of the ES (6.1) fully considers noise associated with</p>	ES Chapter 12 (6.1) Code of Construction Practice (CoCP) (6.3) Register of Environmental Actions and Commitments (REAC) (6.3)	Matter Under Discussion

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			the southern tunnel portal as part of the study (including the implications of 24hr working). This matter remains under discussion subject to Gravesham Borough Council's review of the CoCP (6.3) and REAC (6.3).		
Population and Human Health					
Timing, Form and Function of Replacement Open Space	2.1.107 [GRAVESHAM-#0905] [GRAVESHAM-#0931] [GRAVESHAM-#0973] [GRAVESHAM-#0975]	Gravesham Borough Council recognises that there is an identified need for additional open space but is concerned that the form and functional relationship (to existing open spaces) for the open space (Chalk Park) proposed by the Project would not meet that need given the opportunities that exist locally. Gravesham Borough Council does not consider it clear what objectives from the Gravesham Open Space, Sport and Recreation Assessment and Strategy Chalk Park is intended to meet.	National Highways consider that despite the provision of a range of recreational facilities currently in and around the vicinity of Thong Lane and Gravesend East, there remains an identifiable gap in provision of natural / semi-natural green space within walking distance of residents of Gravesend East (covering the urban area including Valley Drive / Riverside Park) which has been highlighted within the Council's Open Space Assessment (2016). As Chalk Park would be formed using material excavated from the tunnel approach cutting the placement of material would need to happen to a timetable dictated by the excavation of the	ES Chapter 2 (6.2) Draft Development Consent Order (DCO) (3.1)	Matter Under Discussion

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		<p>Gravesham Borough Council is concerned about the period of time this land will be under construction and unavailable for public use.</p>	<p>cutting. The Project Description (Chapter 2 of the Environmental Statement (6.1) will set out construction assumptions and timing for the creation of Chalk Park.</p> <p>The timing and development of the landscape and ecology aspects of Chalk Park will be subject to the Landscape and Ecology Management Plan (LEMP) advisory group, secured via Schedule 2 requirement 5 of the draft DCO (3.1). This will give Gravesham Council a clear understanding of the final form and timescales for completion of Chalk Park as the detailed design develops.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the Environmental Masterplan and further detail on timing of proposals.</p>		
<p>Construction Effects, Closures and Diversions of PRow</p>	<p>2.1.108 [GRAVESHAM-#0793] [GRAVESHAM-#0800]</p>	<p>Gravesham Borough Council is concerned that materials consulted upon as part of the Community Impacts Consultation in 2021 show the direct loss of footpaths reducing amenity</p>	<p>National Highways recognise that a short term contraflow on the A226 (less than 1 month) is required to create a construction access from the A226 (detailed in the oTMPfC (7.14), but that there are no other plans to close</p>	<p>Health and Equality Impact Assessment (HeqIA) (7.10) Outline Traffic Management Plan for</p>	<p>Matter Under Discussion</p>

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	[GRAVESHAM-#0880]	and access to the countryside for residents of Westcourt ward, with relatively long-term diversions that may not have an acceptable user experience.	<p>the existing road, footway and cycle provision.</p> <p>Provision has been made within the Order Limits to temporarily widen the A226, should it be necessary to maintain the safety of vulnerable road users whilst the A226 is being used by LTC construction traffic and for the utilities diversion works.</p> <p>National Highways is content that the Ward Impact Summary Section 3.5.1 (Community Impact Consultation) details the construction impacts to WCH routes in the Thong Lane area, which include proposals to maintain a temporary walking-cycling crossing throughout the construction period, maintaining east-west walking-cycling links. This crossing would connect the north and south of Thong Lane along a temporary realignment and provide links to Shorne lfield Road. It is noted that this temporary route may be subject to intermittent closures to facilitate utility works, although these closures are expected to only be for a few days at a time.</p>	Construction (oTMPfC) (7.14)	

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			<p>The HEqIA (7.10) includes a section specifically relating to active travel routes, which does include the quality of the users' experience of those routes.</p> <p>This matter remains under discussion pending Gravesham Borough Council's review of the HeqIA (7.10).</p>		
Principle and Design of Routes	2.1.109 [GRAVESHAM-#0673]	Gravesham Borough Council consider that provision for WCHs south of the river – including looping routes and links with existing routes, intersecting at Thong Lane – need detailed consideration in liaison with stakeholders on both the principle and the detailed routes.	<p>National Highways held a briefing with Gravesham Borough Council and KCC (4/4/22) to set out the overall plans for WCH routes to the south of the river, confirming that WCHs south of the river – including looping routes and links with existing routes, intersecting at Thong Lane – have been through detailed consideration in liaison with stakeholders on both the principle and the detailed routes.</p> <p>For more information about the proposed walking, cycling and horse riding routes, see the Project Design Report (7.4).</p> <p>The WCH provision in the Project is set out in application documents, specifically the Rights of Way & Access Plans</p>	<p>Project Design Report (7.4)</p> <p>Rights of Way & Access Plans (2.7)</p> <p>Schedule 5 of the Draft Development Consent Order (DCO) (3.1)</p>	Matter Under Discussion

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			<p>(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). This matter remains under discussion subject to Gravesham Borough Council's review of these application materials.</p>		
<p>Consideration of effects on the Tilbury-Gravesend Ferry</p>	<p>2.1.110 [GRAVESHAM-#0190]</p>	<p>Gravesham Borough Council notes that the impact of the Project on the Tilbury to Gravesend Ferry is not considered.</p>	<p>National Highways has considered various options during the development of the Project to provide improved river crossings for walkers and cyclists. The options investigated included 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.</p> <p>All of these options have been rejected (as part of the Project itself, without prejudice to future Designated Funds works) for reasons including lack of technical feasibility, operational issues, lack of commercial viability, cost and poor safety.</p> <p>National Highways do not anticipate that construction</p>	<p>N/A</p>	<p>Matter Not Agreed</p>

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			<p>workers would use the Ferry to commute to construction compounds.</p> <p>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.</p>		
<p>NMU Crossing of the LTC/River</p>	<p>2.1.111 [GRAVESHAM-#0190]</p>	<p>Gravesham Borough Council notes that there is potential to consider a more comprehensive transport package for the Project that also seeks to improve/fund ferry and bus services across the Thames as an alternative to the private car, providing a cycle link cross-river.</p>	<p>National Highways recognises the opportunity to, and importance of, improving sustainable transport provision across and along the river, but as complementary measures to the Project which provides the infrastructure improvements that ma facilitate measures. by providing the north-south connection and junction improvements, this facilitates that the whole of the Project route will be accessible to local and longer distance public transport routes, if operators choose to make use of it, including operators supporting e.g. cross-river WCH transit (by bus).</p>	<p>N/A</p>	<p>Matter Not Agreed</p>

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			<p>National Highways considers that Local Authorities are best placed to lead on the development and appraisal of future public transport projects including ferry and bus services across the river.</p> <p>National Highways has set up a Sustainable Transport Working Group involving local authority stakeholders to investigate sustainable travel and cross-river connectivity enhancements that could be delivered in future to complement the Project. The Group has proposed several local priorities and opportunities for feasibility studies for future funding applications for Designated Funds.</p> <p>Designated Funds are very much considered the appropriate mechanism for providing these measures, which fall outside of the remit of the DCO, but may be facilitated by it to lead to improvements in sustainable modes and forms of transport across the river.</p>		
PRoW access during construction	2.1.112	Gravesham Borough Council is concerned that construction works will limit	Chapter 13 of the ES (6.1) sets out the effects of construction works on PRoW.	ES Chapter 13 (6.1)	Matter Under Discussion

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		<p>the availability of PRoW to the east of Gravesend, particularly along the A226 and A2 and the area between these roads.</p>	<p>This sets out that 15 PRoW (including NCR 177 – see below) would be affected during this time, in most cases resulting in route diversion to maintain connectivity (albeit with an increase in journey length) and in some cases resulting in intermittent closures or interference, temporary closures and some permanent closures. Any diversions have been assessed in line with DMRB LA 112.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the assessment and proposed mitigation (further iterations of the SoCG will consider the overall approach to assessment and mitigation as well as approaches to specific routes).</p>		
Effects on National Cycle Route 177 (NCR 177)	2.1.113	<p>Gravesham Borough Council is concerned that the Project would result in changes to NCR 177 including reduction of access and indirect disturbance.</p>	<p>National Highways has identified that NCR 177 between Gravesend East junction and the Park Pale bridge over the A2 would initially be affected by utility works. The route would also be permanently closed to</p>	ES Chapter 13 (6.1)	Matter Under Discussion

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			<p>accommodate the new LTC/A2 junction. Upgrades to existing footpaths and tracks would be undertaken prior to the closure of the existing NCR177 alignment to ensure that a suitable alternative route is available; once works are complete an alternative roadside route would be available as a permanent diversion.</p> <p>This is assessed within Chapter 13 of the ES (6.1).</p> <p>Although both the temporary and permanent diversions to NCR 177 involve increased travel distances, National Highways considers that these are not significant in terms of affecting their level of use by cyclists in terms of the overall distances typically travelled by cyclists using the route; both the temporary and permanent diversion routes allow for improved user experience.</p>		
Effects on Primary School Children (Construction)	2.1.114 [GRAVESHAM-#0654]	Gravesham Borough Council is concerned that the length of the construction period increases its impact in	National Highways acknowledge this issue and has considered the duration of impacts as well as their nature. Duration affects significance,	Outline Traffic Management Plan for Construction (oTMPfC) (7.14)	Matter Under Discussion

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		<p>terms of disruption and additional traffic on some children whose whole primary school education will be affected by the Project.</p>	<p>with longer durations resulting in greater magnitudes. National Highways has drafted an oTMPfC, which includes, for example, avoiding HGV movements outside schools during start and finish times. Any schools that would be adversely affected by construction activities are included in National Highways liaison programme. National Highways consider this to be a matter under discussion subject to Gravesham Borough Council's review of the ES Chapter 13 (6.1) and oTMPfC (7.14).</p>	<p>ES Chapter 13 (6.1)</p>	
<p>Assessment of Cumulative Effects on Health</p>	<p>2.1.115 [GRAVESHAM-#0860] [GRAVESHAM-#0798]</p>	<p>Gravesham Borough Council recognises that the Project has considered cumulative and in-combination effects on health (e.g. access, construction noise and perceptions of poor air quality) but is concerned that mitigation needs to be developed for this combined effect.</p>	<p>National Highways is in agreement that in-combination effects on health should be considered and this is done through the HEqIA (7.10). This will refer to mitigation measures to be implemented during construction that will be secured by the REAC (6.3) and CoCP (6.3) including management at source, community information/liason, mitigation for receptors and a</p>	<p>Health and Equality Impact Assessment (HEqIA) (7.10) Code of Construction Practice (CoCP) (6.3) Register of Environmental Actions and Commitments (REAC) (6.3)</p>	<p>Matter Under Discussion</p>

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			<p>consideration of how health inequality in local communities should be considered in terms of the scale of effects and delivery of mitigation.</p> <p>This matter will be progressed via CIPHAG and reviewed by Gravesham Borough Council on receipt of the updated HEqIA (7.10).</p>		
HIA recommendation from independent review - Health Priorities	2.1.116 [HEqIA-61]	Links between local health priorities and the assessment should be made clear. Where the local priorities identify topics or sensitive groups, these should be considered in the assessment (including in consideration of enhancement measures).	<p>The links between local health priorities and the assessment has been made clear in the Health and Equalities Impact Assessment (HEqIA). Where the local priorities identify topics or sensitive groups, these have been considered in the assessment (including in consideration of enhancement measures).</p> <p>Further discussions will be carried out with Gravesham Borough Council once this document has been shared.</p>	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion
HIA Recommendations from Independent review - Construction Phasing	2.1.117 [HEqIA-62]	Further information should be provided on construction phasing as part of HEqIA (when available) and indication of how this may influence assessment and	Further information on construction phasing has been included in the HEqIA. The HEqIA includes a table showing how consultation responses	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion

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		an explanation of how HEqIA has been planned and timed to inform decision making.	have influenced decision making. Further discussions will be carried out with Gravesham Borough Council once this document has been shared.		
HIA Recommendations from Independent review - Scope	2.1.118 [HEqIA-63]	Further commentary and evidence should be provided to understand how the scope of the HIA was identified and agreed. This could include provision of further information on the outcomes of discussions on scoping that were undertaken with the Community Impacts and Public Health (CIPH) advisory group.	Further commentary and evidence has been provided to describe how the scope of the Health Impact Assessment has been developed. This includes the outcomes of discussions on scoping that were undertaken with the Community Impacts and Public Health Advisory Group (CIPHAG). Further discussions will be carried out with Gravesham Borough Council once this document has been shared.	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion
HIA Recommendations from Independent review – Stakeholder Engagement	2.1.119 [HEqIA-64]	Further information should be provided on the outcomes of stakeholder engagement exercises and how this has meaningfully informed the HEqIA and the Project. 1. This includes providing further details of what was agreed at the CIPH advisory group and	Following the Independent Review of the HEqIA included within the DCOv1 application, and subsequent discussions with stakeholders at the CIPHAG meetings, it was agreed that the revised HEqIA would incorporate sections evidencing how engagement with stakeholders has informed the Project. This is informed by	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		<p>methods of engagement and issues raised at the focus groups and how these comments were addressed.</p> <p>2. Information should also be included on measures used to reach hard to reach groups. Wider concerns have also been raised regarding the consultation activities which should be addressed as part of the wider consultation strategy.</p>	<p>the 'You Said, We Did' documents shared with stakeholders as part of previous consultations and a summary will be presented in the revised HEqIA on a topic by topic basis. Further discussions will be carried out with Gravesham Borough Council once this document has been shared.</p>		
<p>HIA Recommendations from Independent review - Ward sensitivity</p>	<p>2.1.120 [HEqIA-65]</p>	<p>NH should clarify how ward sensitivity has been determined through clear links to the baseline.</p>	<p>This was discussed at CIPHAG meeting held on 29th September 2021. At this meeting, the process for attributing sensitivity on a ward by ward basis was presented to stakeholders using a series of metrics (people aged 60+, children, income deprivation, health metrics (long term illness, disability, expectancy, hospital emissions (COPD etc), deaths from respiratory diseases) to attribute low, medium or high sensitivity to individual wards. LTC acknowledged that there are some data limitations as 2011 census data is used for a</p>	<p>ES Chapter 13 - Population and Human Health (6.1)</p>	<p>Matter Under Discussion</p>

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			<p>couple of metrics, however most is much more recent (e.g. Public Health England data). This information was subsequently shared with CIPHAG members who were asked to provide feedback as appropriate.</p> <p>This remains a matter under discussion pending Gravesham Borough Council's review of application documents.</p>		
<p>HIA Recommendations from Independent review - Methodology for aggregating impacts</p>	<p>2.1.121 [HEqIA-66]</p>	<p>Justification / methodology for aggregating impacts at general population / ward level should be provided. Use of GIS mapping for baseline and assessment information would enable a clearer understanding of specific impacts including effects on health inequalities.</p>	<p>In each case, the scale of data that can be presented is informed by the approach to baseline data availability, monitoring data, modelling, and assessment of significant effects in-line with each relevant chapter of the Environmental Statement. The location, scale and sensitivity of sensitive receptors and concentration of effects in spatial and temporal terms has been considered, along with the health metrics. Where appropriate, mapping has been used to present baseline and assessment information. Where impacts have been aggregated at Ward level, justification has been provided. More detailed geographic assessments have been included</p>	<p>Health and Equality Impact Assessment (HEqIA) (7.10)</p>	<p>Matter Under Discussion</p>

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			<p>where appropriate. Effects on health inequalities have been strengthened throughout the HEqIA.</p> <p>Further discussions will be carried out with Gravesham Borough Council once this document has been shared.</p>		
HIA Recommendations from Independent review - Duration of effects	2.1.122 [HEqIA-67]	<p>Further information should be included about the duration of effects anticipated beyond if they are temporary or permanent. This is particularly relevant to the health outcomes identified during the construction phase as this phase is anticipated to last six years. Further information should be included on if effects are considered to be short term, medium term or long term and a definition provided which outlines what each of these terms mean (e.g. short term = 1-2 years).</p>	<p>Further information has been included in the HEqIA about the duration of effects anticipated beyond if they are temporary or permanent. These durations are taken from the individual EIA assessments and considered in the context of each other, the sensitivity of receptors, and their relation to health effects.</p> <p>Further discussions will be carried out with Gravesham Borough Council once this document has been shared.</p>	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion
HIA Recommendations from Independent review - Severity	2.1.123 [HEqIA-68]	<p>The assessment should provide information on the severity and likelihood of the health outcomes. At present it is just stated whether a health outcome</p>	<p>The assessment of health impacts is currently in line with that set out in the Design Manual for Roads and Bridges (DMRB) LA112 Population and Human Health, which outlines</p>	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
and Likelihood of health outcomes		is considered to be positive, negative or neutral, however the assessment would benefit from further information being provided on the severity of the effect (e.g. minor, moderate or major positive/ negative) to help provide a more balanced assessment and increase understand of the level of health outcomes anticipated.	that health impacts should be described as positive, negative, neutral or uncertain, with supporting evidence provided to support as necessary. This is the approach undertaken for DCO submission. This is a matter under discussion pending Gravesham Borough Council's review of the full methodology for the HEqIA.		
HIA Recommendations from Independent review - Data Sources	2.1.124 [HEqIA-69]	There are some concerns identified with the technical data sources used to inform the HEqIA (e.g. transport, air quality and noise assessments). Technical concerns should be addressed and updated accordingly in the HEqIA as these may have implications for the health outcomes identified. Clarification should also be provided on how the level of effect identified in the source assessment has been translated into the effect identified in the HEqIA (including how this	The HEqIA uses the findings of each of the topic-specific assessments within the EIA and relies on the technical data sources developed for those assessments. Further discussions will be carried out with Gravesham Borough Council once this document has been shared.	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		has been aggregated to general population / ward level)			
HIA Recommendations from Independent review - Effectiveness of mitigation	2.1.125 [HEqIA-70]	The HEqIA should provide further information regarding effectiveness of mitigation / enhancement measures. This could include providing a conclusion on the residual health outcome anticipated after mitigation measures is implemented.	The assessment of health impacts is currently in line with that set out in the DMRB LA112 Population and Human Health, which outlines that health impacts should be described as positive, negative, neutral or uncertain, with supporting evidence provided to support as necessary. More information has been included within the assessments, around the effectiveness of mitigation where appropriate. Further discussions will be carried out with Gravesham Borough Council once this document has been shared.	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion
HIA Recommendations from Independent review - Monitoring	2.1.126 [HEqIA-71]	Further information to be included on monitoring (impacts, mitigation, and enhancement – to be clearly specified), how this will be secured and anticipated timelines.	Monitoring has been discussed within the CIPHAG meetings. Where monitoring has been agreed for individual topics, this has been highlighted in the HEqIA. The monitoring of health specifically or as an aggregated indicator is not proposed. This is a matter under discussion pending Gravesham	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			Borough Council's review of the full HEqIA included as part of the DCO application.		
HIA Recommendations from Independent review - Cumulative Effects	2.1.127 [HEqIA-72]	An assessment of cumulative effects (in relation to inter project effects) should be included in the HEqIA instead of cross referencing the ES to see that cumulative effects on vulnerable groups are appropriately considered.	The HEqIA includes a cumulative effects section and this has been revised for the DCO application. Further discussions will be carried out with Gravesham Borough Council once this document has been shared.	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion
HIA Recommendations from Independent review - Limitations	2.1.128 [HEqIA-73]	The HEqIA should include a limitations sections to clearly outline any limitation or constraints of the assessment.	The HEqIA includes a limitations sections to clearly outline any limitation or constraints of the assessment. this is a matter under discussion pending Gravesham Borough Council's review of the full HEqIA included as part of the DCO application.	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion
EqlA Recommendations from Independent Review - Lack of Specificity	2.1.129 [HEqIA-74]	The overall document lacks specificity, with individual incidences being highlighted in the tabulated analysis of the EqlA. It is important to be specific about the rationale behind decisions when evidencing that they meet the requirements of the Equality	Appendix B of the HEqIA has been expanded to respond to the concerns raised and to be specific about the rationale behind decisions when evidencing that they meet the requirements of the Equality Act 2010 and the Public Sector Equality Duty.	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		Act 2010 and the Public Sector Equality Duty. Lack of specificity in the EqIA leads to an assumption that some things have been missed, when it is possible this work has been done.	this is a matter under discussion pending Gravesham Borough Council's review of the full HEqIA included as part of the DCO application.		
EqIA Recommendations from Independent Review - Context	2.1.130 [HEqIA-75]	The document lacks important context, such as study area demographic breakdowns. Providing this would give a clearer picture as to whether resources/consultation efforts have been correctly apportioned. Where shortfalls are identified, analysis of possible reasons for this and reasonable mitigations should be included.	Study area demographic breakdowns for all protected characteristics are included in Appendix C of the HEqIA and this information was shared prior to and discussed with the CIPHAG at the meeting in Jan 2022. this is a matter under discussion pending Gravesham Borough Council's review of the full HEqIA included as part of the DCO application.	Health and Equalities Impact Assessment - Appendix C - Baseline (7.10)	Matter Under Discussion
EqIA Recommendations from Independent Review - Disparity in genders	2.1.131 [HEqIA-76]	There is a large disparity between numbers of male and female consultees. This is of particular concern as gender plays an important role in travel patterns, and women may have less time to take part in consultation activities than men.	This is noted as an issue, and the literature reviews have identified the importance that gender plays in travel patterns. National Highways produced a Hard-to-reach Strategy prior to the Community Impacts Consultation in 2021, which sets out what has been done to enable engagement by different protected characteristics,	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			including gender. This strategy was presented and discussed at a CIPHAG meeting in 2021. this is a matter under discussion pending Gravesham Borough Council's review of the full HEqIA included as part of the DCO application.		
EqlA Recommendations from Independent Review - Specific Characteristic Groups	2.1.132 [HEqIA-77]	Additionally, the Project has been recorded as having a 'neutral' impact on Sex and Religion or Belief characteristic groups. It is recommended this is reviewed and consultation with representatives of these groups evidenced and reconsidered.	The Equalities Impact Assessment (EQIA) has been updated and this comment has been reviewed in line with the updates prepared. Various community groups, including those representing community facilities such as places of worship have been engaged with as part of the wider programme of community engagement for the Project. Relevant findings have been reported on as appropriate in the EqlA. This is a matter under discussion pending Gravesham Borough Council's review of the full HEqIA included as part of the DCO application.	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion
EqlA Recommendations from Independent Review -	2.1.133 [HEqIA-78]	Covid-19 should be considered more comprehensively in the EqlA as it effects groups differently and is impacting	Undertaking consultation and engagement to develop a DCO application during the Covid-19 pandemic (and the legislation and advice that limited usual	Health and Equality Impact Assessment (HEqIA) (7.10)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
Consideration of Covid 19		upon and shaping travel habits and consultation efforts.	consultation and engagement measures) has had implications, particularly for those with protected characteristics that may have found it differentially or disproportionately more difficult to contribute and engage. This clearly has implications for the approach to HEqIA, and as such the Project has adapted it's approach with this in mind to remove barriers to engagement and consultation. A hard-to-reach strategy was prepared in advance of the Community Impacts Consultation, and the Project's stakeholder team has worked to reach such groups. A summary of how such groups have been engaged has been included in the HEqIA report. National Highways has complied with its duty to have regard to views expressed by consultees in developing the Project, as is demonstrated in the Consultation Report, which is part of the DCO application. this is a matter under discussion pending Gravesham Borough Council's review of the full	Consultation Report (5.1)	

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			HEqIA included as part of the DCO application.		
EqlA Recommendations from Independent Review - Intersectional Characteristics	2.1.134 [HEqIA-79]	Intersectional characteristics (i.e., Religion and Gender, Age and Disability) appear not to have been considered. This can be of specific use in identifying hard-to-reach groups who may have more complex considerations, and in providing important context.	The cumulative assessment within the HEqIA has been revisited and strengthened as part of DCO submission, including intra-project effects. Appendix B of the HEqIA makes reference to intersectional characteristics where this is considered to be relevant. this is a matter under discussion pending Gravesham Borough Council's review of the full HEqIA included as part of the DCO application.	Health and Equalities Impact Assessment - Appendix B - Highways England EqlA Screening Template (7.10)	Matter Under Discussion
Road Drainage and the Water Environment					
New, diverted and reinstated watercourses in the AoNB	2.1.135 [GRAVESHAM-#0709]	Gravesham Borough Council consider that perched watertables/ponds in the AoNB must be retained, and proposals on marshes should respect or recreate the historic drainage ditch patterns on the marsh. Gravesham Borough Council require clarity on monitoring and subsequent actions.	National Highways plans for the Project do not reinstate, divert or create any new watercourses within the AONB, and National Highways considers that (as set out in the ES) there is no likely significant impact on perched water tables/ponds. On the marshes south of the River Thames the Project would not change any historical drainage ditch patterns. This matter remains under discussion subject to	ES Chapter 14 (6.1) Register of Environmental Actions and Commitments (REAC) (6.3)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			Gravesham Borough Council's review of the approach to monitoring and mitigation set out in the ES (Chapter 14 – Road Drainage and the Water Environment) (6.1) and the REAC (6.3)		
Surfacing of hard landscape	2.1.136 [GRAVESHAM- #0713]	Gravesham Borough Council agree to the principle identified by the Project in terms of (some) surfacing of hard landscape, but note that paving selected should consider whether planting has been removed causing increased run-off, and considered on a case-by-case basis.	National Highways agree that the runoff regime may be affected where areas of planting have been removed, until vegetation cover re-establishes. Measures (secured by the REAC (6.3)) will be put in place to manage runoff from earthworks and areas of vegetation stripping during construction to ensure no off site increase in surface water flooding risks. National Highways is committed to a Surface And Foul Water Drainage Scheme, to be developed post-consent, in line with the REAC (6.3). This document will be developed in consultation with relevant planning authorities and is secured by Requirement 8 of the dDCO (3.1).	Register of Environmental Actions and Commitments (REAC) (6.3) Draft Development Consent Order (DCO) (3.1)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			This matter remains under discussion subject to Gravesham Borough Council's review of the REAC (6.3)		
Cascading drainage attenuation ponds	2.1.137 [GRAVESHAM-#0753] [GRAVESHAM-#0933]	Gravesham Borough Council is concerned that the proposed cascading drainage attenuation ponds are an un-natural feature (as presented in 2021 Community Impacts Consultation) and lower ponds may need to be re-designed.	National Highways notes that the Design Principles (7.5) explains that the design of the proposed drainage ponds will be naturalistic, to enhance the landscape character on the east side of the Project route. This matter remains under discussion subject to Gravesham Borough Council's review of the Design Principles (7.5).	Design Principles (7.5)	Matter Under Discussion
Climate					
Scale of analysis	2.1.138 [GRAVESHAM-#0566]	Gravesham Borough Council consider that analysis of carbon should be presented on a Local Authority scale in order to assess the effect on Gravesham Borough Council's efforts for carbon neutrality	National Highways will not be disaggregating predicted emissions at Local Authority level as the NPSNN does not require this level of detail. The emissions from traffic on the strategic road network will be subject to national policy, and for fossil fuel powered vehicles there are a range of strategies set out in <i>Decarbonising Transport: A Better, Greener Britain</i> designed	N/A	Matter Not Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			to ensure that the UK achieves its net zero obligations by 2050.		
Exemplar Measures	2.1.139 [GRAVESHAM-#0301] [GRAVESHAM-#0566] [GRAVESHAM-#0585]	<p>Gravesham Borough Council consider that the Project would be expected to be an exemplar in this field, with a compelling case to overcome concerns around climate change and carbon neutrality.</p> <p>An appropriate package of measures could include:</p> <ul style="list-style-type: none"> a) an approach to blue/green infrastructure; b) a commitment to fund other carbon offsetting measures, e.g. off- site improvements to the WCH network to encourage alternatives to the car; c) a scheme to improve ferry services between Gravesend and Tilbury, e.g. electrical propulsion; or d) assistance for Gravesham Borough Council to reduce its carbon footprint to offset that of the project. 	<p>National Highways intend that the Project will be an exemplar for low carbon construction.</p> <p>The maintenance and replacement emissions, for which National Highways are responsible, would be limited as far as possible.</p> <p>The Carbon and Energy Management Plan (7.19) details the measures incorporated to develop the Project's carbon baseline as well as setting out the process and procedures that the Contractors will be required to follow to continue to identify carbon efficiencies and innovations.</p> <p>National Highways and Gravesham Borough Council are currently engaging on possibilities for a feasibility plan to support Gravesham Borough Council's ambitions related to sustainable heating at Cascades Leisure Centre.</p> <p>Details of National Highways position relating to blue/green infrastructure provision,</p>	The Carbon and Energy Management Plan (7.19)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			improvements to the WCH network, and opportunities for cross-river link improvements are considered elsewhere in this table. These matters remain Under Discussion as set out above.		
Habitats Regulation Assessment					
Habitats Regulation Assessment (HRA) – Consideration of Alternatives	2.1.140 [GRAVESHAM-#0047]	Gravesham Borough Council consider that the approach to HRA has been deficient, and the process should consider all reasonable alternative options and is not artificially limited by previous decisions	National Highways’ position is that the Habitats Regulation Assessment (HRA) (6.5) need only consider alternatives if an adverse effect on integrity cannot be excluded as a possibility in the appropriate assessment. The HRA (6.5) has concluded there would be no adverse effects on integrity and therefore can be excluded. This matter remains under discussion subject to Gravesham Borough Council’s review of the HRA (6.5).	HRA (6.5)	Matter Under Discussion
Nitrogen Deposition					
Principle of Site Acquisition and Management	2.1.141 [GRAVESHAM-#0951]	Gravesham Borough Council is concerned about the justification for the need to acquire proposed Nitrogen Deposition sites,	The acquisition is required to provide compensation for nitrogen deposition impacts on designated ecological habitats. Compensation measures would	outline Landscape and Ecology Management Plan (oLEMP) (6.7)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		<p>and requires information about how these sites would be maintained and managed.</p>	<p>include providing new, wildlife-rich habitats, primarily formed of woodland with some other associated habitats e.g. grassland. The land parcels which have been selected are either close to the affected habitats and/or would allow connectivity to existing woodland.</p> <p>Details of long term management of these sites will be set out in the Landscape and Ecology Management Plan (LEMP). An outline LEMP will be submitted with the DCO application (6.7). The LEMP will be further developed by the Contractor for approval by the Secretary of State (SoS) in consultation with relevant stakeholders. The final version of the LEMP created by the Contractor will provide more detail as the detailed design emerges and will inform the detailed establishment, management, and maintenance regimes.</p> <p>This matter therefore remains under discussion subject to Gravesham Borough Council's</p>		

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
			review of the above application materials.		
Viability of agricultural uses on Nitrogen Deposition sites	2.1.142 [GRAVESHAM-#0954]	Gravesham Borough Council is concerned about the effect on the ongoing viability of agricultural use on the remainder of the land used for nitrogen deposition compensation.	<p>National Highways has engaged with the landowners of sites proposed as Nitrogen Deposition compensation sites in order to ascertain the potential effects on agricultural operations and continued commercial viability.</p> <p>As set out within the Site Selection Methodology note shared with stakeholders in July 2022, Grade 1 agricultural land not adjacent to the Project Order Limits and not currently impacted by the project has been ruled out, with other agricultural land acceptable with caveats.</p> <p>A preference was identified in the refinement criteria for land where the landowner has expressed a desire to sell. Where agricultural land has been identified, a compensation package will be negotiated by the landowner in the first instance, or through the Compensation Code if a Compulsory Acquisition is required.</p>	outline Landscape and Ecology Management Plan (oLEMP) (6.7)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
Planting at Nitrogen Deposition sites	2.1.143 [GRAVESHAM-#0956] [GRAVESHAM-#0963] [GRAVESHAM-#0924] [GRAVESHAM-#0927] [GRAVESHAM-#0958] [GRAVESHAM-#0966] [GRAVESHAM-#0967]	Gravesham Borough Council is concerned that planting proposals for each of the sites should reflect ecological and landscape requirements, public access, geology and soils, and historic environment appropriate to the locality and be made in close consultation with stakeholders in terms of habitat networks, appropriate land cover, and compatibility with electricity pylons running through the sites.	National Highways agree that habitat connectivity should be promoted through a collaborative approach as secured through the advisory group as part of the oLEMP (6.7). The design of the habitats will include both woodland and grassland planting and will be developed in collaboration with stakeholders and in respect to the existing landscape character, physical features and geology and soils. The detailed design of habitats will be developed in consultation with stakeholders to maximise the site's local and regional benefits for ecology and landscape, and avoid detrimental effects in relation to cultural heritage assets. This matter remains under discussion subject to Gravesham Borough Council's review of the oLEMP (6.7).	outline Landscape and Ecology Management Plan (oLEMP) (6.7)	Matter Under Discussion
Detail of proposed Nitrogen Deposition	2.1.144 [GRAVESHAM-#0968]	Gravesham Borough Council is concerned that, in common with all the proposed areas of Nitrogen	National Highways can confirm that the proportion of woodland habitat to be created on the nitrogen deposition	outline Landscape and Ecology Management Plan (oLEMP) (6.7)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
compensation planting		<p>Deposition Compensation land, woodland cover is not necessarily the most appropriate land cover/habitat type for this location.</p> <p>Historic mapping and the Landscape Assessment for the area provides some support for this view.</p>	<p>compensation areas is likely to vary across sites to respond to the individual characteristics of each location and may therefore comprise a higher or lower proportion of woodland, with the balance made up of other suitable habitats designed to provide the required compensation.</p> <p>This matter remains under discussion subject to Gravesham Borough Council's review of the oLEMP (6.7).</p>		
Nitrogen Deposition Site Selection (Consideration of Alternative Sites)	<p>2.1.145 [GRAVESHAM-#0925] [GRAVESHAM-#0926] [GRAVESHAM-#0928] [GRAVESHAM-#0952] [GRAVESHAM-#0957] [GRAVESHAM-#0965]</p>	<p>Gravesham Borough Council consider that there may be more appropriate sites than those presented in the Local Refinement Consultation materials. For example:</p> <p>Church Road Ifield – while this is a logical extension of planting, Gravesham Borough Council has objected to existing agricultural land being lost in this area which has not historically been wooded and suggests an alternative along the south side of</p>	<p>National Highways engaged with stakeholders including Gravesham Borough Council on the approach to selecting Nitrogen Deposition Compensation areas.</p> <p>National Highways shared a Site Selection Methodology Note with Gravesham Borough Council on 22/7/22 which set out the Project's approach to identifying the most appropriate sites for the purpose required.</p> <p>The approach considered the ecological suitability of land parcels, a review of potential environmental effects, existing land use, planting and</p>	outline Landscape and Ecology Management Plan (oLEMP) (6.7)	Matter Not Agreed

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
		<p>HS1 west towards Pepper Hill (not focused on trees)</p> <p>Shorne south – Gravesham Borough Council consider that there may be more appropriate sites, for example north of this site.</p> <p>Crutches Lane, Higham – Gravesham Borough Council consider that there would be advantage in extending the area to the west of Crutches Lane up to the main road as this is shown as woodland on historic mapping.</p> <p>Henhurst Road and to the east of Shorne Village – these are outside Biodiversity Opportunity Areas which Gravesham Borough Council consider may limit their potential</p>	<p>environmental designations and constraints.</p> <p>As such, National Highways is confident that the sites selected reflect a balance of the best available to compensate for the effect of nitrogen deposition.</p> <p>National Highways will engage with stakeholders via the advisory group secured by the LEMP to develop detailed designs for the sites in terms of planting, access and maintenance.</p>		
Nitrogen Deposition Methodology	2.1.146 [GRAVESHAM-#0920]	Gravesham Borough Council is concerned that there is not enough detail provided to clarify the link	National Highways can confirm that sites have the potential to be affected only when they are	Appendix 5.6 to ES Chapter 5 (Air Quality) (6.3)	Matter Under Discussion

Topic	Item number	Gravesham Borough Council comment	National Highways comment	Application Document Reference	Status
	[GRAVESHAM-#0952]	<p>between affected sites and compensation sites in terms of size and criteria for selection.</p> <p>The areas of affected sites look very large though from the text the main area that is impacted is roughly a zone of 200m from the pollution sou</p>	<p>within 200m of the affected road network.</p> <p>A full detailed methodology is included as part of the application. Appendix 5.6 to ES Chapter 5 (Air Quality) (6.3) covers the sites identified as being significantly impacted as well as the steps taken to review options for mitigation and compensation and the rationale for how the compensation strategy was developed and our final proposals.</p> <p>National Highways shared a Site Selection Methodology Note with Gravesham Borough Council on 22/7/22 which set out the Project's approach to identifying the most appropriate sites for the purpose required.</p> <p>This remains a matter under discussion subject to Gravesham Borough Council review of application documents</p>		

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, such as emails, meeting notes, etc.
- a. Draft versions of Application Document 1.3, Introduction to the Application and Application Document 1.4 (September 2022)
 - b. Schedule of expected changes to the EIA (May 2022) via CIPHAG
 - c. Slides showing the LTC Team’s work in identifying levels of contamination in and around the future Chalk Park area (May 2022) and Chalk Park Contamination LTC Response (June 2022)
 - d. Draft S 106 Heads of Terms for Community Fund and SEE Strategy (August 2022)
 - e. Slides (presented to Kent County Council) setting out the Project’s approach to Road Asset Maintenance (January 2022) and Traffic Displacement during Construction (September 2022)
 - f. Nitrogen Deposition Site Selection Methodology Note (July 2022)
 - g. Notes of meeting with Kent County Council providing a ‘Q&A’ on the Project’s approach to Nitrogen Deposition (May 2022)
 - h. Employment, Skills and Education – Group 3 Technical Update Note (June 2022)
 - i. Cordon Model Technical Note (April 2022)
 - j. Specific Note setting out the Project’s responses to Gravesham Borough Council’s Consultation Issues on Charging (May 2022)
 - k. Technical Note for Cumulative Effects Assessment and Provisional Long List of Developments (July and August 2022)
 - l. LTC Sub-regional NMU Study (April 2022)
 - m. Draft LEMP Advisory Group Terms of Reference (April 2022)
 - n. Hatch Agreements – Project-wide and Principles (April 2022)
 - o. Slides explaining updates to NMU/WCH since Community Impact Consultation and for Local Refinement Consultation (April 2022)

- p. Notes from Securing Mechanisms Workshop with local authorities 03/11/21
- q. Slides from Securing Mechanisms Workshop with local authorities 03/11/21
- r. Consultation materials released by the Project at the following stages of consultation and corresponding responses:
 - i. Route Consultation (Opened January 2016, closed March 2016)
 - ii. Statutory Consultation (Opened October 2018, closed December 2018)
 - iii. Supplementary Consultation (Opened January 2020, closed April 2020)
 - iv. Design Refinement Consultation (Opened July 2020, closed August 2020)
 - v. Community Impacts Consultation (Opened July 2021, closed September 2021)
 - vi. Local Refinement Consultation (Opened May 2022, closed June 2022)
- s. ESSPG Community Impacts Consultation comments – November 2021
- t. Scoping Opinion: Proposed Lower Thames Crossing, 2017
- u. Meeting notes of all other relevant meetings (2017-2022)

Appendix B Glossary

Term	Abbreviation	Explanation
Adequacy of Consultation Response	AoCR	-
Application Document	-	A document submitted to the Planning Inspectorate as part of the application for development consent.
Area of Outstanding Natural Beauty	AONB	Statutory designation intended to conserve and enhance the ecology, natural heritage and landscape value of an area of countryside.
Benefit Cost Ratio	BCR	The ratio of benefits to costs.
Chronic Obstructive Pulmonary Disease	COPD	An obstructive lung disease characterised by chronically poor airflow that typically worsens over time.
Code of Construction Practice	CoCP	Contains control measures and standards to be implemented by the Project, including those to avoid or reduce environmental effects.
Combined Modelling and Appraisal Report	ComMA	The purpose of the Combined Modelling and Appraisal Report is to inform decision makers and stakeholders on how the evidence underpinning the business case has been developed, from the initial identification of the underlying problem through the collection of data and the production of any supporting traffic models and forecast impacts of the Project on traffic to the eventual economic appraisal.
Community Impacts and Public Health	CIPH	-
Community Impacts and Public Health Advisory Group	CIPHAG	-
Compensation Code	-	Legislation, case law and established practice concerning the rights to compensation for those affected by compulsory purchase and the procedures for assessing the correct amount.
Compulsory acquisition	-	The compulsory acquisition of land or buildings for public interest purposes.
Department for Transport	DfT	The government department responsible for the English transport network and a limited number of transport matters in Scotland, Wales and Northern Ireland that have not been devolved.

Term	Abbreviation	Explanation
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.
Design Refinement Consultation	-	An additional non-statutory consultation for the Project held between July and August 2020 on further revisions to the Statutory Consultation and Supplementary Consultation proposals.
Development Consent Order	DCO	Means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects (NSIP) under the Planning Act 2008.
Emergency Services and Safety Partners Steering Group	ESSPSG	-
Emissions Factors Toolkit	EFT	The Emissions Factors Toolkit (EFT) is published by Defra and the Devolved Administrations to assist local authorities in carrying out review and assessment of local air quality as part of their duties under the Environment Act 1995.
Environmental Impact Assessment	EIA	A report prepared for a consenting authority who, when deciding whether to grant consent for a project which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process.
Environmental Management Plan	EMP	For the Project, a plan setting out the conclusions and actions needed to manage environmental effects as defined by the Design Manual for Roads and Bridges standard LA 120. The CoCP is the equivalent of the first iteration of the EMP (EMP1). The contractor's EMP would be EMP2 and the end of construction EMP would be EMP3.
Environmental Masterplan	-	A package of information on existing and future environmental commitments and objectives, ongoing actions and risks to be managed, handed over to those responsible for future management and operation of the asset. The Environmental Masterplan for the Project is provided as Figure 2.4 (Application Document 6.2) of the ES.
Environmental Statement	ES	A document produced to support an application for development consent that is subject to Environmental Impact Assessment (EIA), which sets out the likely impacts on the environment arising from the proposed development.
Examining Authority	-	The Examining Authority is appointed by the Secretary of State to examine an application for a Development Consent Order and make a recommendation.

Term	Abbreviation	Explanation
Framework Construction Travel Plan	FCTP	A plan that sets out a framework to reduce the impact of the project's construction workforce on the road network as a result of travel to and from construction areas and compounds (including utility logistic hubs).
Geographic Information System	GIS	An integrated collection of computer software and data used to view and manage information about geographic places, analyse spatial relationships and model spatial processes.
Green Belt	-	A policy and land use zone designation used in land use planning to retain areas of undeveloped land surrounding urban areas.
Green bridges	-	Bridges over linear infrastructure projects like roads and railways, constructed to enable safe crossing by animals, reducing severance.
Habitats Regulations Assessment	HRA	A tool developed by the European Commission to help competent authorities (as defined in the Habitats Regulations) to carry out assessment to ensure that a project, plan or policy will not have an adverse effect on the integrity of any Natura 2000 or European sites (Special Areas of Conservation, Special Protection Areas and Ramsar sites), either in isolation or in combination with other plans and projects, and to begin to identify appropriate mitigation strategies where such effects were identified.
Health and Equalities Impact Assessment	HEqIA	A systematic process used to identify the potential health and equalities impacts arising from policies, plans, programmes and projects, to identify the distribution of those effects amongst the population and to identify mitigation measures to address these effects, thereby minimising adverse effects on the local population
Health Impact Assessment	HIA	An assessment of potential impacts on human health. Not a legal requirement but good practice and will almost certainly be done for the Project.
Heavy Goods Vehicle	HGV	A large, heavy motor vehicle used for transporting cargo.
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.
Landscape and Ecology Management Plan	LEMP	A document which provides details on the delivery and management of the landscape and ecology elements identified in the Environmental Masterplan for the Project, including their success criteria.
Lower Thames Crossing	LTC	The proposed A122 Lower Thames Crossing (the Project).
Landscape and visual impact assessment	LVIA	Part of a planning application or environmental assessment that looks at the impact of development on the character of a landscape.

Term	Abbreviation	Explanation
Lead Local Flood Authority	LLFA	LLFAs are county councils and unitary authorities. They lead in managing local flood risks (i.e. risks of flooding from surface water, ground water and ordinary (smaller) watercourses). This includes ensuring co-operation between the Risk Management Authorities in their area. The LLFA for the M25 area is Essex County Council who is acting on behalf of Thurrock.
Local Impact Report	-	
Local Plan	-	A Local Plan sets out local planning policies and identifies how land is used, determining what will be built where. Adopted Local Plans provide the framework for local development across England.
Lower Thames Area Model	LTAM	The strategic highway model produced by Highways England to appraise the impacts of the Lower Thames Crossing
National Policy Statement	NPS	There are 12 designated National Policy Statements (NPSs), setting out government policy on different types of national infrastructure development, including energy, transport, water and waste. NPSs provide the framework within which Examining Authorities make their recommendations to the Secretary of State.
National Policy Statement for National Networks	NPSNN	The NPSNN sets out the need for, and Government's policies to deliver, development of Nationally Significant Infrastructure Projects on the national road and rail networks in England. It provides planning guidance for promoters of Nationally Significant Infrastructure Projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.
Operations and Maintenance	O&M	A generic term referring to the ongoing Operations and Maintenance elements of the Project as distinct from the design and construction phases.
Order Limits	-	The Order Limits are the outermost extent of the Lower Thames Crossing indicated on the Plans by a red line. This is the Limit of Land to be Acquired or Used (LLAU) by the Lower Thames Crossing. This is the area in which the DCO would apply.
outline Materials Handling Plan	oMHP	Sets out the approach and highlevel principles for handling construction materials and waste on the Lower Thames Crossing project, both inside and outside the Order Limits.
outline Site Waste Management Plan	oSWMP	A document which sets out how resources will be managed, and waste controlled during the Project. Plans usually involve recording the amount of waste that will be produced and details the proposed methods of waste disposal.
outline Traffic Management Plan for Construction	oTMPfC	A plan setting out the strategy and measures to be adopted with respect to highway and transportation issues for the Project. The CTMP supports the DCO application and would be embedded within the eventual construction contractor documentation and will form an overarching and comprehensive management procedure for the contractor to adhere to.

Term	Abbreviation	Explanation
Overarching Written Scheme of Investigation	OWSI	Sets out the scope, guiding principles and methods for the planning and implementation of essential archaeological mitigation
Preliminary Environmental Information Report	PEIR	An early output of the EIA process, and part of the DCO application process.
Public Right of Way	PRoW	A right possessed by the public to pass along routes over land at all times. Although the land may be owned by a private individual, the public may still gain access across that land along a specific route. The mode of transport allowed differs according to the type of Public Right of Way, which can consist of footpaths, bridleways and open and restricted byways.
Register of Environmental Actions and Commitments	REAC	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).
Reinstatement	-	The act of restoring something to a condition agreed with the relevant authorities.
Rendezvous Point	RVP	A location to which all police and emergency services personnel attending an incident should be directed.
Rest and Service Area	RASA	A public facility located next to a large thoroughfare such as a motorway, expressway, or highway, at which drivers and passengers can rest, eat, or refuel without exiting onto secondary roads.
Road Investment Strategy	RIS	The Government's long-term strategy to improve England's motorways and major A roads. The first RIS (known as RIS 1) was published in 2015 and covers the period 2015-2020. A second RIS (RIS 2) was published in 2020, and covers the post-2020 period.
Scoping	-	The process of identifying the issues to be addressed by the Environmental Impact Assessment process. It is a method of ensuring that an assessment focuses on the important issues and avoids those that are considered unlikely to be significant.
Secretary of State	SoS	The Secretary of State has overall responsibility for the policies of the Department for Transport.
Shorne Woods Country Park	SWCP	-
Site of Special Scientific Interest	SSSI	A conservation designation denoting an area of particular ecological or geological importance.
Site Specific Travel Plans	SSTP	-

Term	Abbreviation	Explanation
Skills, Employment and Education	SEE	-
Special Protection Area	SPA	A designation under EU Directive 2009/147/EC on the Conservation of Wild Birds.
Statement of Community Consultation	SoCC	Sets out how local communities in the vicinity of the Project will be consulted. Directly affected and neighbouring local authorities will be consulted on the content of the SoCC before it is finalised.
Statutory Consultation	-	The statutory pre-application consultation held by the Applicant on the Project proposals between October and December 2018.
Strategic road network	SRN	The core road network in England managed by National Highways.
Supplementary Consultation	-	The non-statutory consultation for the Project, held between January and April 2020 on revisions to the Statutory Consultation proposals.
Traffic Management Plan	TMP	A plan that outlines the approach to carrying out temporary traffic management for the safe construction of the project. It also explains management measures available to the Contractor to reduce the impact on the local community.
Transport Analysis Guidance	TAG	National guidance document produced by the Department for Transport.
Trip End Model Presentational Program	TEMPro	DfT software for viewing data from the DfT's National Trip End Model
Utility Logistics Hub	ULH	Construction areas and compounds for both the main construction works and the utility works.
Walkers, cyclists and horse riders	WCH	Walkers, cyclists and horse riders.
Web-based Transport Appraisal Guidance	WebTAG	Former name given for the Department for Transport's web-based multi-modal guidance on appraising transport projects and proposals, now known as Transport Analysis Guidance (TAG).
Wider Network Impacts Management and Monitoring Plan	WNIMMP	Plan setting out a traffic impact monitoring scheme to be carried out a year prior to opening and one and five years after the road opens.

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 Our engagement with Gravesham Borough Council has been undertaken via various forms and these comprise of regular technical engagement meetings including; monthly procedural meetings, wider network impacts meetings, strategic discussions, monthly CIPHAG meetings, and additional technical meetings.
- C.1.3 In addition to the meetings / correspondence listed in the table, there has also been regular correspondence by email / phone call. This is not reported in the table.
- C.1.4 As set out in the Statement of Engagement, the issues in this Statement of Common Ground have been developed through a process of collating and responding to formal consultation responses and positions received from engagement with Gravesham Borough Council. National Highways and Gravesham Borough Council have been exchanging positions on these issues formally since February 2022.

Table C.1 Engagement activities between National Highways Gravesham Borough Council

October 2020 – August 2022		
Procedural Matters & Strategic Discussions		
01.10.20 – 07.07.22	Meeting 27 occurrences	Regular Catch-up sessions Fortnightly or Monthly catch-up meetings with Gravesham Borough Council and Kent County Council to provide updates and discuss ongoing work actions and tasks. These meetings form the basis for general technical discussions and include, for example, issue resolution, briefing from environmental specialists on specific issues not covered by topic-specific meetings, sharing of project information and information requests.
20/01/2021	Meeting	Gravesham Borough Council Technical Coordination Meeting A meeting to touch base on a range of issues related to technical engagement and coordination

08/04/2021	Meeting	<p>Progress Meeting</p> <p>Responding to approach to Gravesham Borough Council's comments</p> <p>Responding to update on ward summaries</p> <p>Responding to our summary of the issues that will be included in the You Said We Did (YSWD) issues South of the River Thames</p> <p>Responding to comments on the approach to engagement events</p>
23/02/2022	Meeting	<p>LTC-Gravesham Borough Council S106 Heads of Terms/Group 3 Discussion</p> <p>Discussion on progress on Group 3 issues; Discussion on Gravesham Borough Council's potential S106 ask</p>
31/05/2022	Meeting	<p>LTC-Gravesham Borough Council Meeting (Key Issues)</p> <p>Discussion of Gravesham Borough Council Key Issues</p>
Specific Technical Meetings		
03/09/2020	Meeting	<p>Chalk Park Proposals</p> <p>Discussion with LTC to allow Gravesham Borough Council and Kent County Council understand precisely what is being proposed at Chalk Park.</p> <p>Purpose of the meeting to outline to Gravesham Borough Council and Kent County Council of the proposed works to ensure a consist understanding</p>
09/02/2021	Meeting	<p>Utilities Design and Shorne Woods</p> <p>To provide Kent CC and Gravesham with an update on the utilities design at Shorne Woods and on the legacy space.</p> <p>1. Updated utilities model. Discussion and clarification of the new model followed.</p> <p>2. Shorne Woods Country Park car park - KCC agreed with the legacy car park in principle, but location not practical at Thong Lane</p>
24/03/2021	Meeting	<p>Transport Assessment</p> <p>Discussion on updated TA chapter 8</p> <ol style="list-style-type: none"> 1. Local Highway Network 2. Strategic Highway Network 3. Construction accesses 4. Flows
29/03/2021	Meeting	<p>Design and Non-Motorised Users</p> <p>Presentation on approach to design and quality from LTC</p> <p>Comments on: PROWs, status of some routes, width of Brewers Road bridge, construction impacts</p>

06/07/2021	Meeting	SoCG meeting – Landscape Meeting to progress landscape related matters for the Statement of Common Ground with Gravesham Borough Council 1. Kent Downs AONB severance 2. A2/HS1 Corridor (Planting, Central reservation, A2/M2 Junction) 3. Green Bridges
01/07/2022	Meeting	Chalk Park / Landscape Catch up on Chalk Park contamination and SoCG process; Planning for on-site Landscape session
26/07/2022	Meeting / Site Visit	Landscape Issues & Green Bridges Meeting and site visit at Shorne Woods Country Park to discuss outstanding and Local Refinement Consultation landscape matters, design and Green Bridges
Various	Meeting	Technical meetings not elsewhere classified including Traffic modelling (3 occurrences from 06/10/2020 to 07/07/2021) Ground preparation / tunnel briefing (08/10/2020) Cultural heritage and landscape (28/01/2021) Highway design and architectural design (29/03/2021) Construction traffic effects (12/05/2021) Construction traffic management (12/04/2021) Community fund (26/01/2022) Cascades land matters (26/04/2021) Outline Materials Handling Plan (06/07/2021)
Cross Local Authority Discussions		
31.03.21 – 07.07.22	Meeting 11 occurrences	Community Impacts and Public Health Advisory Group
31.03.21 – 07.07.22	Meeting 4 occurrences	Skills, Employment and Education Working Group
15/09/2020	Meeting	Air Quality Technical Session with Tier 1 Authorities
24/11/2020 and 08/12/2020	Meeting	Update / Walkthrough on DCO application
13/01/2021 and 10/03/2021	Meeting 2 occurrences	Heritage Working Group
20/01/2021	Meeting	Community Working Group
22/01/2021 and 11/03/2021	Meeting 2 occurrences	Sustainable Transport Working Group
25/02/2021	Meeting	Tunnel Design and Safety Consultation Group
29/04/2021	Meeting	oLEMP and oSWMP Meeting

28/03/2022 to 16/06/2022	Meeting 3 occurrences	Emergency Services and Safety Partners Steering Group Specific sessions on safety and security, response times and tunnel and road design
09/02/2021	Meeting	Traffic Modelling Meeting with KCC, Gravesham Borough Council and Medway Council to discuss the need for a revised Core Scenario, or an Alternative Scenario, in line with TAG Unit M4.
03/11/2021	Meeting	Securing Mechanisms Workshop
22/09/2021	Meeting	LTC Local Authority Engagement / Issue Resolution Process A meeting with local planning authorities and TfL to set out the intended approach to engagement going forwards. The purpose of this reset was to responded to issues raised within the Collective Local Authorities Note of Issues in September 2021, and to demonstrate how that feedback had been taken on board and to propose a refreshed way of discussing and resolving issues through engagement. The meeting involved setting out the proposals and suggested approaches, as well as a Q&A and to answer any queries the local authorities had. This meeting was held following the circulation of a briefing paper to attendees, which set out the suggested approach.
02/08/2022	Meeting	Local Authority Carbon Update A briefing on the Project's approach to carbon
September 2022	EIA topic specific briefings	EIA Briefings Cross local authority briefings on changes to the Environmental Statement since the withdrawal of the previous DCO submission – topic specific workshops on e.g. Air Quality, Noise, Population & Health, LVIA, Carbon and Climate, Historic Environment etc
Consultation Briefings		
29/06/2021	Meeting	Community Impacts Consultation Materials Briefing For LTC to brief Gravesham Borough Council / KCC on draft consultation materials. Consultation material covered: Construction meeting, Operations update, Ward summaries, You Said We Did, Easy Read, GIS, Other

30/03/2022	Meeting	<p>LTC/KCC/Gravesham Borough Council WCH Update</p> <p>Meeting for the purpose of an update on the WCH strategy development and how it relates to changes in the upcoming consultation.</p> <p>a. A2 Roman Road b. WCHR Hever Court Road equestrian use c. WCHR Michael Gardens footpath NS169 Redesignation d. WCHR A226 equestrian route</p>
September 2017 – September 2020		
Procedural Matters		
01.09.2017 – 30.09.2020	Meeting 12 occurrences	<p>Regular Catch-up sessions</p> <p>Fortnightly or Monthly catch-up meetings with Gravesham Borough Council and Kent County Council to provide updates and discuss ongoing work actions and tasks.</p> <p>These meetings form the basis for general technical discussions and include, for example, issue resolution, briefing from environmental specialists on specific issues not covered by topic-specific meetings, sharing of project information and information requests.</p>
Topic Specific Regular Technical Meetings		
20.11.2017 – 17.09.2020	Meeting 59 occurrences	<p>Technical meetings under a range of topics including:</p> <p>Traffic modelling and scenario planning Community effects Land use, Order Limits / development boundary PRoW and walking, cycling and horse riding Green Infrastructure Legacy, skills and benefits LVIA, landscape issues and photomontage Local traffic impacts (e.g. Luddesdown, Cuxton and Cobham) Design development Emergency response Built heritage Chalk Park Cascades Air Quality Mitigation Options Wider Network Construction Impacts</p>
Cross Local Authority Discussions		
22.09.2017	Meeting	<p>Stakeholder Advisory Briefing to further discuss traffic modelling and provide updates</p>

11.2019 – 07.2020	Meeting 9 occurrences	Community Impacts and Public Health Advisory Group
11.2019 – 07.2020	Meeting 4 occurrences	Skills, Employment and Education Working Group
24/10/2017 – 10/10/2019	Meeting 5 occurrences	Tunnel Design and Safety Consultation Group
17/01/2019 - 10/02/2020	Meeting 4 occurrences	Traffic Modelling Working Group - South
25/04/2019 and 07/11/2019	Meeting 2 occurrences	Design Development Workshop South of the River Thames
10/07/2019	Meeting	Meeting with Multi-Agency Strategic Transport Group
11/11/2019 and 06/02/2020	Meeting 2 occurrences	Construction Impacts Workshop - South
03/12/2019	Meeting	Utilities Workshop – South
22/04/2020	Meeting	Preliminary Environmental Impacts & Mitigation & CoCP Review Workshop - South
21/05/2020	Meeting	Key elements of the DCO Workshop
23/06/2020 and 25/06/2020	Meeting	Environmental Impact & Mitigation and REAC Review Workshops
15/09/2020	Meeting	Air Quality Technical Session with Tier 1 Authorities
Consultation Briefings		
03/10/2018	Meeting	Statutory Consultation Documentation Briefing
04/10/2018	Site Tour	Statutory Consultation Site Tour

In addition to the meetings detailed in Table C.1, information has been shared with stakeholders to assist with their understanding of the Project and its effects. The key technical information (including reports, datasets and application documents) shared with Gravesham Borough Council is outlined in Table C.2.

Table C.2 Key Technical Reports, Datasets & Application Documents Shared

Document	Date Shared with Local Authority
DCO Application Documents	
DCO Application (October 2020) Vol 1 – Vol 7	1 December 2020
Wider Network Impacts Management and Monitoring Plan (Community Impacts Consultation 2021)	July 2021
Updated Statement of Community Consultation	12 February 2021
Updated Transport Assessment Chapter 8	03 February 2021
Framework Construction Travel Plan	11 May 2021

Document	Date Shared with Local Authority
Outline Landscape and Ecology Management Plan	19 February 2021
Outline Site Waste Management Plan	18 February 2021
Outline Traffic Management Plan for Construction	11 February 2021
Outline Materials Handling Plan	28 May 2021
Design Principles	July 2021
Wider Network Impacts Management and Monitoring Plan	July 2021
DCO Schedule 2 and Explanatory Note	July 2021
Code of Construction Practice (including the Register of Environmental Actions and Commitments)	July 2021
Environmental Constraints Map	July 2021
Technical Notes	
Technical note for SoCGs	29 January 2020
Summary Open Space Study	30 January 2020
Draft Agreements Scoping Paper	11 February 2020
Draft Cumulative Assessment Methodology and Long & Short Lists	06 March 2020
Consultation on LVIA Update to Local Landscape Character Area Boundaries	24 March 2020
Palaeolithic and Geoarchaeological Assessment Report and Palaeolithic and Quaternary Deposit Model	03 April 2020
Green Belt Heritage Methodology	03 April 2020
Local Plan Policy Compliance Review	17 April 2020
Traffic modelling (revised DCO Cordon Model)	24 April 2020
Cultural Heritage Desk-Based Assessment	15 May 2020
Sub Regional Non-Motorised Users Study	27 May 2020
Code of Construction Practice (1st Draft)	03 May 2020
Worker Accommodation Summary	17 May 2020
Draft Skills, Education & Employment Strategy	23 May 2020
Permit Scheme Considerations	26 May 2020
Draft DCO + Notification of Development	29 May 2020
Draft Protective Provisions for LLDAs	03 July 2020
Draft ES Topic Chapters	02 July 2020
Draft EMP	14 July 2020
Aggregate Use/Demand Briefing Note	17 July 2020
Flood Risk Assessment (ES Chapter 14 Appendix)	03 August 2020

Document	Date Shared with Local Authority
Revised Issues Logs/Theme Lists	29 July 2020
Draft HEqIA	03 August 2020
Draft Design Principles	25 August 2020
Key Structures Drawings	25 August 2020
Drainage Pollution Risk Assessments (Groundwater Risk Assessments) with LLFAs/LLDAs	28 August 2020
Draft Transport Assessment	October 2020
Code of Construction Practice (2nd Draft) + Register of Environmental Actions and Commitments	18 August 2020
LTC Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation	07 October 2020
Water Balance Technical Note	07 September 2020
Groundwater Modelling Note	07 September 2020
SoCG / Issues Resolution Note	November 2021
LTC Position Paper on Contamination and Chalk Park	May 2022
LTC Technical Note for CEA and Provisional Long-list of cumulative projects	12 th July 2022
Nitrogen Deposition Site Selection Methodology Note	22 nd July 2022
Datasets and GIS	
GIS Shapefiles showing operational traffic model flow forecasts for the LTC	27.04.22
Cordon Model from the LTAM (KCC West Kent Cordons)	03.05.22
Local Refinement Consultation Proposed Order Limits	06.05.22
LTAM DCO2 Highways Schemes Uncertainty Log	16.05.22
Location of Air Quality Monitors installed by National Highways in Gravesham	19.05.22
LTAM cordon model correspondence workbook (KCC West Kent Cordon zone correspondence)	24.05.22
LTAM Zone System GIS	25.05.22

In addition to the meetings / correspondence listed in the tables, there has also been regular correspondence by email / phone call. This is not reported in the table, but the total number of contact entries in our stakeholder database is 1,073.

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