

# Lower Thames Crossing

## 5.4.5.3 Draft Agreed Statement of Common Ground between (1) National Highways and (2) Higham Parish Council (Clean version)

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1.0	31 October 2022	DCO Application
2.0	18 July 2023	Examination Deadline 1

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## Status of the Statement of Common Ground

This is a Draft Statement of Common Ground with matters outstanding.

National Highways considers that this draft Statement of Common Ground is an accurate description of the matters raised by Higham Parish Council and the status of each matter, based on the engagement that has taken place to date.

A high-level overview of the engagement undertaken since the DCO Application was submitted on the 31 October 2022 is summarised in Table A.1 in Appendix A.

## Lower Thames Crossing

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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 on 31 October 2022.
- 1.1.2 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between National Highways (the Applicant) and Higham Parish Council, and where agreement has not yet been reached. Where matters are yet to be agreed, the parties will continue to work proactively to reach agreement and will update the SoCG to reflect areas of further agreement.
- 1.1.3 This version of the SoCG has been submitted at Examination Deadline 1.

## 1.2 Principal Areas of Disagreement

- 1.2.1 On the 19 December 2022 the Examination Authority made some early procedural decisions to assist the Applicant, potential Interested Parties and themselves to prepare for the Examination of the DCO application.
- 1.2.2 One of these procedural decisions was to use a tracker recording Principal Areas of Disagreement in Summary (PADS).
- 1.2.3 The PADS Tracker would provide a record of those principal matters of disagreement emerging from the SoCG and should be updated alongside the SoCG as appropriate throughout the examination with the expectation that a revised PADS Tracker should be submitted at every Examination deadline.
- 1.2.4 This SoCG should be read in conjunction with the Higham Parish Council PADS Tracker.

## 1.3 Terminology

- 1.3.1 In the matters table in Section 2 of this SoCG, “Matter Not Agreed” indicates agreement on the matter could not be reached following significant engagement, and “Matter Under Discussion” where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. “Matter Agreed” indicates where the issue has now been resolved.

## 2 Matters

### 2.1 Movement of outstanding matters

- 2.1.1 Following submission of the previous version of this Draft SoCG between the Applicant and Higham Parish Council, further discussions on the outstanding matters have taken place. These discussions are summarised in Table A.1 in Appendix A and the outcome of these discussions is summarised below.
- 2.1.2 The following matters have moved from ‘Matter Not Agreed’ to ‘Matter Agreed’:
- a. 2.1.11 (Construction / Impacts)
  - b. 2.1.14 (Construction / Construction traffic impacts)
  - c. 2.1.15 (Construction / Construction traffic impacts)
  - d. 2.1.16 (Construction / Mitigation)
  - e. 2.1.17 (Construction / Compensation/funding)
  - f. 2.1.22 (Charging / Local Residents’ Discount Scheme)
  - g. 2.1.44 (Nitrogen Deposition / General methodology/modelling/alternatives)
- 2.1.3 The following matter has moved from ‘Matter Not Agreed’ to ‘Matter Under Discussion’:
- a. 2.1.9 (Construction / Construction traffic impacts)
- 2.1.4 At the Open Floor Hearing 1, Higham Parish Council requested the inclusion of additional narrative to item 2.1.9. The Applicant agreed to this request to aid the Examining Authority’s understanding of the status of discussions related to construction/construction traffic impacts.
- 2.1.5 Further to the matters raised in the original SoCG, Higham Parish Council submitted further comments during their submission at Open Floor Hearing (OFH) 1 [**Application Documents [EV-017](#) and [EV-018](#)**] which has led to new matters being included in Table 2.1. The new matters are:
- a. 2.1.45 (Route selection, modal alternatives and assessment of reasonable alternatives / Route selection)
  - b. 2.1.46 (Design – Road, Tunnels, Utilities / Design)
  - c. 2.1.47 (Wider Network Impacts / Non-LTC highway improvements)

- 2.1.6 Table 2.1 details and presents the matters which have been agreed, not agreed, or are under discussion between (1) the Applicant and (2) Higham Parish Council.
- 2.1.7 In the column ‘Item No’ in Table 2.1, ‘Rule 6’ indicates a matter entered in the SoCG as a result of a request in the Rule 6 letter, ‘RRN’ indicates a matter entered into the SoCG as a result of content in the Relevant Representation, ‘RRE’ indicates an existing SoCG matter that was also raised in the Relevant Representation, ‘DLX’ indicates a new matter added during examination at/around that deadline and ‘OFHX’ indicates a new item added in response to matters raised at an open floor hearing.
- 2.1.8 At Examination Deadline 1 there are 47 matters in total, of which 13 are agreed, 30 are not agreed and 4 are under discussion.

**Table 2.1 Matters**

Topic	Item No.	Higham Parish Council Comment	National Highways’ Response	Application Document Reference	Status
<b>Route selection, modal alternatives and assessment of reasonable alternatives</b>					
Route Selection	2.1.1 RRE	Higham Parish Council are still fundamentally opposed to the proposed route and believe that a tunnel from Dartford to Thurrock bypassing Junctions 1 & 2 on the south side of the river, as suggested during the debate on this crossing in the House of Commons in March of this year, is the best option as it would: (i) reduce congestion; (ii) maximise use of existing infrastructure; (iii) reduce pollution in and around the existing crossing approaches by creating an M25 through route, leaving the existing crossing to take traffic to/from the A2 and A13;	The Project Objectives were agreed through extensive discussions with the Department for Transport and outline what the Lower Thames Crossing should achieve. The objectives are: a. To support sustainable local development and regional economic growth in the medium to long term. b. To be affordable to government and users. c. To achieve value for money. d. To minimise adverse impacts on health and the environment.	Need for the Project [Application Document <a href="#">APP-494</a> ]	Matter Not Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
		(iv) reduce the agricultural land take.	<p>e. To relieve the congested Dartford Crossing and approach roads, and improve their performance by providing free-flowing, north-south capacity.</p> <p>f. To improve resilience of the Thames crossings and the major road network.</p> <p>g. To improve safety.</p> <p>Whilst objectives (e) and (f) do not specifically refer to the south to north capacity, reduction in congestion at the Dartford Crossing and its approach roads; a reduction in journey time and improvements in resilience and connectivity alongside benefits to both the local and regional economy, are the principal benefits which would be delivered through the Project. The Need for the Project sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project. The Project is predicted to result in a significant reduction in traffic flow at the Dartford Crossing, which will also</p>		



Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
			lead to an improvement in air quality at that location.		
Route Selection	2.1.45 (OFH1)	Higham Parish Council, wish to ask why the proposal for the long tunnel option at Dartford was dismissed and not consulted on.	<p>During the development of the Project to date, the Applicant and the Department for Transport (DfT) have considered many options for the route. Each option has been considered carefully with regards to how it would contribute towards the Scheme Objectives agreed with the DfT. For information about these Scheme Objectives, see the Need for the Project.</p> <p>Prior to the 2016 public consultation, the Applicant conducted a detailed appraisal of the short-options to determine which met the Scheme Objectives and should be taken forward to public consultation. The detailed appraisal identified that Route 1 (an option at the existing Dartford Crossing) performed poorly when appraised for the safety, noise and air quality impacts. Therefore, although included in consultation materials, an option at Dartford was not considered viable and not presented as a potential option for further development. The Planning Statement (see Section 5.4)</p>	<p>Need for the Project [<b>Application Document APP-494</b>]</p> <p>Consultation Report [<b>Application Documents APP-064 to APP-069</b>]</p> <p>Planning Statement [<b>Application Document APP-495</b>]</p>	Matter Under Discussion

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
			provides more information on the process to identify and assess potential options and alternatives for the delivery of the Project.		
<b>Design – Road, Tunnels, Utilities</b>					
Tunnels Extension of tunnel portal	2.1.2	Higham Parish Council support the extension of the tunnel but would urge National Highways to consider extending it further south.	The Applicant amended the tunnel portal design by extending it further south by 350m.	N/A	Matter Agreed
Junctions Layout of the M2/A2/A122 Lower Thames Crossing junction	2.1.3 RRE	Higham Parish Council are concerned over A2/M2 widening and layout. Access to/from the A2/M2 between junction 1 and Marling Cross (Gravesend East) with the number of roundabouts especially as the Shorne/Cobham junction no longer has direct access results in the convoluted access routes on and off the A2/M2. The large number of roundabouts to be negotiated will deter drivers and will lead to congestion on a range of rat runs and associated additional traffic through the villages on what are mostly narrow rural roads. Higham Parish Council urge National Highways to look again at these routes and junctions.	The Applicant has looked at the junction configuration and have provided more direct connectivity between Gravesend and the M2 eastbound, and redesigned the Gravesend East junction and link roads to improve journey times and will reduce the impact on the local roads.	N/A	Matter Not Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
Junctions  A226 junction	2.1.4	Higham Parish Council oppose the A226 junction and want to see it removed as soon as possible which in turn would alleviate some of their concern regarding an increase in traffic, noise and pollution	The Applicant removed the A226 junction from the design in November 2017.	N/A	Matter Agreed
Junctions  Reduction of lanes on the A2	2.1.5  RRE	Higham Parish Council note that the junction of the new approach roads with the A2 causes them significant concern. As they understand the proposals, Lower Thames Crossing will be removing the hard shoulder from the A2/M2 in this area. Travelling east, the A2/M2 will only have 2 lanes going straight on and not 3 lanes as at present. There will be a single lane effectively forming the start of the A289 and continuing as the A2 to Rochester, and a single lane going into the tunnel.  (i) There is no resilience built into this junction. If there is an incident or an issue at Dartford, the proposals will become gridlocked and there will be a consequential 'rat-running' through Gravesham and the Medway towns. The Dartford Bridge is now closed on a regular basis because of very high winds and we expect that traffic will be encouraged to use the Lower Thames Crossing when this happens. Higham Parish Council ask, how is the volume of traffic which will be diverted to the Lower Thames	The Applicant notes your concern in relation to the M2/A2/A122 Lower Thames Crossing junction. The junction has been designed in compliance with design standards and has been assessed using the Project's transport model, as well as more detailed microsimulation modelling, to ensure the design is appropriate. In response to your further points:  i) Roads in the UK are not designed to accommodate traffic flows that may be experienced during an incident. The Applicant acknowledges that during incidents there will inevitably be disruption, but the Lower Thames Crossing will mean that for many motorists there is a reliable way to cross the Thames. The bridge at Dartford is not closed regularly because of high winds but for a variety of other reasons, many of which are linked to	Wider Network Impacts Management and Monitoring Plan (WNIMMP) [Application Document <a href="#">APP-545</a> ]	Matter Not Agreed

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		<p>Crossing expected to be safely accommodated by forcing it into one lane?</p> <p>(ii) The A2 takes all traffic including agricultural tractors and trailers, which, depending on traffic conditions, already cause significant congestion. Reducing the number of lanes will make this worse;</p> <p>(iii) The proposed flyover which carries the two 'straight on' lanes should be built as 3 lanes so that it has a hard shoulder, a break down at this point will cause significant congestion and, if your modelling is wrong (which we believe it is) it will be very expensive to correct the problem at your fifth-year review;</p> <p>(iv) The A2 is often congested from west of the M25/A282 junction to the M2. Creating a bottleneck at the junction with the new road will make this worse. The existing junction with the A289 causes significant tailbacks because of the need for traffic to get into one lane before the junction. The same happens with the junctions with the A227 and at Marling Cross (Valley Drive). At the latter junction, traffic currently queues on the A2 eastbound in order to exit, and going westbound at busy times traffic drives through the service area and along the long slip road because of the tailback from the</p>	<p>the high levels of traffic using the crossing.</p> <p>ii) The number of lanes has been altered as the proposed design splits A2 and M2 traffic (two lanes for the A2 and two for the M2, which become four once lanes from the A122 Lower Thames Crossing merge). The vehicle types mentioned would not be able to use the A122 or M2 links, and so would use the new A2 lanes which would provide connectivity to/from Brewers Road (eastbound only), the A2 into Strood and A289.</p> <p>iii) It is not a flyover and does have a hard shoulder. The Lower Thames Area Model (LTAM) has been built specifically to examine the forecast impacts of the Lower Thames Crossing on the road network. In areas close to the Project, the Applicant has included a significant level of detail and made use of the capabilities of the software to reflect local conditions. As mentioned above, the Applicant has also used detailed microsimulation modelling to assess the design at these complex junctions.</p>		

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		existing junction down the slip road and on to the A2.	iv) The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case-making through existing funding mechanisms and processes. An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) is included in the application, providing information about the proposed traffic monitoring.		
Tunnels  Footbridge over the tunnel approach	2.1.6	Higham Parish Council have concerns on the Public Rights of Way south of the river and urge National Highways to look again – particularly in relation to the foot bridge over the tunnel approach road near to the portals. Higham Parish Council believe this creates a massive risk in relation to people who might be inclined to jump from this point and believe if the tunnels were to be extended further south this problem would be solved.	The Applicant amended the tunnel portal design by extending it a further 350m, and the footbridge over the tunnel was diverted in January 2020.	N/A	Matter Agreed

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Safety  Lack of hard shoulder	2.1.7  RRE	Higham Parish Council question the lack of a hard shoulder through the tunnel – is this safe? Will it cause major problems if there is an accident or breakdown(s) in the tunnel?	<p>Improving safety is one of the Scheme Objectives. The Lower Thames Crossing would be an all-purpose trunk road, similar to the A13 and other A-roads. It is being designed and built to the highest safety standards recommended, but the Applicant will continue to adapt its proposals in line with new guidance.</p> <p>The new road's safety features would include vehicle detection, emergency areas, variable mandatory speed limits and lane closure signals in the event of an incident, such as a vehicle breakdown or collision.</p> <p>Control measures across the route, including in the tunnel, would identify vehicles stopping in a live lane and allow for rapid changes of traffic management to avert danger. In the tunnels, recovery services would be provided for any stopped vehicle. Technology would also help the emergency services to access incidents. This includes signage that can be changed to alert road users of lane closures, speed restrictions and incidents ahead. If one tunnel is</p>	<p>Consultation Report [<b>Application Documents</b> <a href="#">APP-064 to APP-069</a>]</p>	Matter Not Agreed

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			<p>blocked, emergency vehicles could access incidents using the pedestrian cross-passages that connect the two tunnels at regular intervals.</p> <p>More information is presented in the Consultation Report.</p>		
Design Signage	2.1.46 (OFH1)	Higham Parish Council, are concerned that the hill up to Cobham is likely to be affected by sun and the high ascent and therefore that's likely to affect people's ability to read signs.	<p>The location of signage has been designed in accordance with the Design Manual for Roads and Bridge (National Highways, 2019). Further detail would be developed at the detailed design stage and informed by Road Safety Audits to identify any safety issues within the design. For more information about signage, see the Project Design Report and the Design Principles.</p> <p>Signage would be installed to ensure that the route performs safely and provides motorists with timely notifications of road layouts and destinations. Signage would include variable speed limits to manage traffic flow and maintain safety, along with real-time journey information on the approaches to the route, including information about any incidents and journey times for the Dartford Crossing and the Project, so</p>	<p>Project Design Report [<a href="#">Application Documents APP-506 to APP-515</a>]</p> <p>Design Principles [<a href="#">Application Document APP-516</a>]</p>	Matter Under Discussion

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			motorists could make informed decisions about their route.		
<b>Construction</b>					
Construction traffic impacts	2.1.8	Higham Parish Council expected the 'Local Refinement Consultation' to address issues raised in last year's consultation, but it has not.	The Applicant explained that works are required both north and south of the A226. A Transport Assessment of the construction phase forms part of the DCO application.	Transport Assessment [ <b>Application Document APP-529</b> ]	Matter Not Agreed
Construction traffic impacts – A226	RRE	There are still no mitigation proposals for the proposed increase in traffic on the A226, which is particularly severe during construction. The A226 generally is suitable for HGV traffic, but not at the Forge Lane/Gads Hill School (Grade 1 listed) junction. The junction is narrow, dangerous for cars turning, cyclists (cycle path ceases) and school children crossing the A226. Higham Parish council believe that the Local Refinement Consultation said a lot about cycleway and similar provisions but ignored the fact that the existing provision on the A226 does not comply with current guidance and needs significant upgrading to make it safe to use with the existing level of traffic let alone with your predicted increase in increase in volume. Currently these cycle lanes are not used as much as might be expected, which is not surprising with large vehicles passing in very close proximity.	The Applicant is committed to an outline Traffic Management Plan for Construction (oTMPfC) in the DCO, which will be developed post DCO consent (if approved) by the Contractor, in line with the controls in the approved Code of Construction Practice (CoCP). Where possible, haul routes and the strategic road network have been used for access to minimise use of the local road network. In some instances where alternatives are limited, the use of the local road network would be required. The oTMPfC outlines the arrangements for a Traffic Management Forum to be formed with key stakeholders along with other interested parties invited as	oTMPfC [ <b>Application Document APP-547</b> ] Environmenta l Statement (ES) Appendix 2.2: CoCP [ <b>Application Document APP-336</b> ]	



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		<p>The existing metalled surface should be of sufficient width to allow the proper provision of cycle facilities, its division into traffic lanes and cycle paths just needs reorganising and included in your proposals.</p> <p>No cycle lane exists at Gads Hill School/Forge Lane junction of the A226. There is insufficient width to add a cycle lane as part of the road surface. Alternative cycle lane provision must be made if this is to be used for construction traffic because it is significantly unsafe at this point. In the event haul roads are implemented and use of the A226 as a construction route is removed this would not be required.</p> <p>See also item 2.1.9 for fuller picture.</p>	<p>required. These will be held on a regular basis and address cycle routes.</p> <p>The Applicant and Higham Parish Council met on 15 June 2023 to discuss construction issues including the Gads Hill School/Forge Lane junction and the concerns in relation to cyclists along the A226. Both parties will update their positions for Examination Deadline 2.</p>		
<p>Construction traffic impacts</p> <p>Construction traffic impacts – A226</p>	2.1.9	<p>As stated in the item above, Higham Parish Council are concerned about HGV traffic at the Forge Lane/Gads Hill School junction. Higham Parish Council would also like to see the inclusion of a Traffic light system at Forge Lane/Gads Hill School junction.</p> <p><u>Additional narrative following OFH1:</u> <b>Unsuitability of A226 at Higham</b></p> <p>The A226 generally is suitable for HGV traffic, but not at the Forge Lane/Gads Hill</p>	<p>Temporary traffic management measure proposals will be consulted on with the relevant highway authority as set out in the oTMPfC which refers specifically to the role of the Traffic Management Forum and traffic manager, with attendees, consultees and contributors listed. As such, the length, nature and duration of temporary traffic management measures will be discussed and relevant highway authority comments, issues</p>	oTMPfC [Application Document <a href="#">APP-547</a> ]	Matter Under Discussion

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
		<p>School (Grade 1 listed) junction. The junction is narrow; dangerous for cars turning, cyclists (cycle path ceases) and school children crossing the A226.</p> <p><b>Gads Hill Grade 1 listed.</b></p> <p>Gads Hill, home of Charles Dickens, is a grade one listed house; as are the front wall and the path dug under the A226 by Charles Dickens. It is unclear at this time whether the path and steps under the A226 would support the weight of a significant number of additional HGV's passing overhead. This is not referenced under Built Heritage Community Impacts Report.</p> <p><b>Traffic blockages in Higham</b></p> <p>Any delay in traffic egressing and entering Forge Lane and Gads Hill School/Crutches Lane will cause significant disruption in Higham village. The village will become gridlocked. There are not suitable alternative exits from the village.</p> <p><b>Proposal</b></p>	<p>considered and incorporated where reasonably practicable.</p> <p>Following Higham Parish Council's submission at Open Floor Hearing 1, The Applicant will carefully consider the additional points raised and continue engagement with Higham Parish Council.</p>		

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
		<p>HPC propose that construction traffic is banned from utilising the A289/A226 and that construction traffic utilise the proposed haul roads. Currently NH have stated that the haul roads will be utilised only for earth movements and not for movements of construction plant, machinery, materials (concrete) and staff. Utilising haul roads would reduce climate impact, noise, vibration, fuel economy, nitrogen deposition and effects on ancient woodland.</p> <p><b>Alternative Proposal</b></p> <p>In the event that the above proposal is not implemented, HPC request that Examination requires the layout of the Forge Lane/Gads Hill School junction to be reviewed and revised. HPC request that data is sought now, to ratify the concerns. The data then be used to consider alternative layouts (i.e., inclusion of traffic lights/deletion of traffic lights at Villa Road) and that these also be trialled in advance of the LTC construction traffic commencing.</p>			
Mitigation	2.1.10	Higham Parish Council are very concerned regarding the impact of the lengthy works and long working hours which will mean six years of dust, noise and disruption for 12	The Applicant has sought to reduce the Project's impact on the local community during its construction phase. Measures are included in the	ES Appendix 2.2: CoCP [Application	Matter Not Agreed

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Duration of construction	RRE	<p>hours minimum Monday - Friday. The use of the A226 as a main construction route will have a huge impact on the village. Any delay in traffic egressing and entering Forge Lane and Gads Hill School/Crutches Lane will cause significant disruption in Higham village. The village will become gridlocked. There are not suitable alternative exists from the village.</p> <p>Higham Parish council ask, what are National Highways' planned mitigation measures for the A226 during construction and operation?</p> <p>See also 2.1.9 for fuller picture.</p>	<p>Register of Environmental Actions and Commitments (REAC) in the CoCP to minimise the potential for dust, noise, and disruption.</p> <p>A balanced approach between working hours and lengthening the overall duration has been taken. The CoCP highlights the working hours strategy, with the aim to keep the majority of works to core hours with the exception of certain works (e.g. tunnelling) which require longer working hours.</p> <p>ES Chapter 12: Noise and Vibration includes the assessments of construction activities and construction traffic which has informed mitigation measures. Dust mitigation is also covered in the air quality assessment in ES Chapter 5: Air Quality.</p> <p>The oTMPfC also outlines measures available to the Contractor to reduce the impact on the local community relating to journey time reliability, access, severance and safety. Once appointed, the Contractor would produce a plan in accordance with the oTMPfC for their use when working on the new road.</p>	<p><b>Document</b> <a href="#">APP-336</a> ES Chapter 12: Noise and Vibration <b>[Application Document</b> <a href="#">APP-150</a> ES Chapter 5: Air Quality <b>[Application Document</b> <a href="#">APP-143</a> oTMPfC <b>[Application Document</b> <a href="#">APP-547</a></p>	

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			<p>The A226 Gravesend Road has been included in the Order Limits to allow temporary road-widening if required to maintain the safety of other road users while it is used by construction traffic.</p> <p>Construction traffic impacts will also be minimised by the Project introducing a right-turn-only movement for construction Heavy Goods Vehicles (HGVs) when exiting the southern tunnel entrance compound.</p>		
<p>Impacts</p> <p>Construction phase noise and vibration – A2/M2 junction</p>	2.1.11	<p>Higham Parish Council have raised questions at Community Impacts Consultation specifically relating to the construction phase noise levels in the vicinity of the Three Crutches by the A2/M2 junction. Can we be provided with the promised response. We note the response from National Highways and that the baseline is moving 1dB and therefore accept this issue at this time, however we would like clarity that current noise levels are within legal limits.</p>	<p>ES Figure 12.2: Construction Traffic Noise - Affected Links presents the roads which are predicted to experience a change of 1dB or more during the construction phase of the Project. As presented on Page 1 of this document, the change in road traffic noise level in the vicinity of the A2/M2 junction are predicted to be less than 1dB(A), which is below the threshold of human hearing and as such, the significance of road traffic noise during the construction phase would be negligible.</p>	<p>ES Chapter 12: Noise and Vibration  <b>[Application Document APP-150]</b>                      ES Figure 12.2                      Construction Traffic Noise - Affected Links  <b>[Application Document APP-310]</b></p>	Matter Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
			<p>Currently within the United Kingdom there are no legal limits with regard to environmental noise.</p> <p>ES Chapter 12: Noise and Vibration includes further information and mitigation measures.</p>		
<p>Impacts</p> <p>Construction phase traffic including noise and vibration – Lower Rochester Road/Chalk Road</p>	2.1.12	<p>Given that Lower Rochester Road/Chalk Road in Higham and their continuation as Lower Road in Shorne are not meant to be used for construction traffic according to the draft Control Documents, Higham Parish Council note National Highways' response, however we are concerned about the use of Lower Rochester Road and Chalk Road. We understand that these roads are not within the Order Limits but feel that they should have a ban from construction traffic using them. We will continue to raise this issue via the Traffic Management Forum.</p>	<p>The Applicant explained that the increase in traffic flows and road traffic noise levels along Lower Rochester Road/Chalk Road in Higham in years 3 and 4 of the construction phase is likely to be due to non-Project related traffic changing their route as a result of traffic management measures elsewhere. The Applicant explained that the oTMPfC outlines the proposed construction routes and also proposed banned routes.</p> <p>Table 2.2 of the oTMPfC states that <i>'the Project will introduce a construction HGV ban on Lower Higham Road and provide a primary access to the A226 Gravesend Road compound from the A226 Gravesend Road'</i>.</p>	oTMPfC [Application Document <a href="#">APP-547</a> ]	Matter Not Agreed
Construction traffic impacts	2.1.13	Higham Parish Council note that within the draft control documents, there will be traffic	The Applicant explained that temporary traffic management	oTMPfC [Application	Matter Not Agreed

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Construction impacts – A226 by Gads Hill School	RRE	<p>lights to facilitate construction vehicles entering and leaving the construction compounds 3 and 3a from/to the A226.</p> <p>Given the increase in traffic volumes resulting from construction traffic, Higham residents will have additional problems leaving their houses and local roads and crossing and joining the A226.</p> <p>Higham Parish Council perceive this to be a particular problem at the staggered cross roads formed by Forge Lane and Crutches Lane with the A226 by Gads Hill School. The Gads Hill School car park is accessed via Crutches Lane and used by parents to drop off and collect their children, as well as staff and visitors, so they do not park on the main road. Because of the difficulty in exiting Crutches Lane, some parents stop on the A226 to drop off their children, despite the school discouraging this. In addition, those children who walk to school have to cross the A226 at this point, as do those wishing to go to/from the bus stop in the vicinity. Higham Parish Council require this junction to be traffic light controlled both during the construction phase and subsequently.</p> <p>Higham Parish Council would like to see a tripartite set up between National Highways, Kent County Council and themselves, to discuss the Forge Lane / Gads Hill School</p>	<p>measure proposals will be consulted on with the relevant highway authority as set out in the oTMPfC, alongside the Traffic Management Forum and traffic manager, with attendees, consultees and contributors listed.</p> <p>As such, the length, nature and duration of temporary traffic management measures will be discussed and relevant highway authority comments, issues considered and incorporated where reasonably practicable.</p> <p>There is a commitment from the Applicant that HGV movements will not be allowed to pass school entrances during drop off/pick up (Table 2.3 of the oTMPfC).</p> <p>The Applicant met with Higham Parish Council on 15 June 2023 to discuss construction related matters. In this meeting the Forge Lane/Gads Hill School (Grade I listed) junction was discussed. Although haul roads are proposed, they are currently planned to be used for the movement of earthworks. Movements of plant, construction materials and staff are planned along</p>	<p><b>Document</b> <a href="#">APP-547</a>]</p>	

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		<p>(Grade I listed) junction with regards to monitoring performance currently and during construction. Higham Parish Council's preferred option would be that construction traffic is not routed from the A226 to the A289 but that haul roads are built enabling access direct from the A2 to the compounds in Gravesend.</p> <p>Higham Parish Council propose that construction traffic is banned from utilising the A289/A226 and that construction traffic utilise the proposed haul roads. Currently National Highways have stated that the haul roads will be utilised only for earth movements and not for movements of construction plant, machinery, materials (concrete) and staff. Utilising haul roads would reduce climate impact, noise, vibration, fuel economy, nitrogen deposition and effects on ancient woodland.</p> <p>See also 2.1.9 for fuller picture.</p>	<p>the A226 route due to construction phasing constraints at Thong Lane.</p> <p>The Applicant notes the request for a tripartite with Kent County Council and will work with Higham Parish Council to progress this matter.</p>		
<p>Construction traffic impacts</p> <p>Construction impacts – traffic</p>	2.1.14	<p>Higham Parish Council state that special consideration needs to be given both to the effect of the construction traffic on the funeral corteges and other traffic going to and from the Crematorium on the A226 and ease of access and egress for such traffic. This then needs to be carried forward to the</p>	<p>The Applicant explained that special consideration will be given to the crematorium. The Project Team is engaging with the crematorium and measures will be considered in collaboration with them so that disruption is kept to a minimum.</p>	<p>oTMPfC [Application Document <a href="#">APP-547</a>]</p>	Matter Agreed



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from the Crematorium		operational phase when traffic levels are predicted to be even higher. Higham Parish Council note National Highways' comment regarding special consideration to the crematorium and accept this item.	Crematoriums are taken into account in Table 2.3 of the oTMPfC: ' <i>Access and egress is to be maintained throughout the construction period with the exception of night-time and weekend closures when required for specific planned works</i> <i>Advance warning and particular sensitivity around significant events, particularly evenings and weekends.</i> '		
Construction traffic impacts  Construction impacts – Lower Higham Road	2.1.15	Higham Parish Council feel that the various documents seem confused as to the use which is to be made of Lower Higham Road for construction traffic. To be clear we do not expect the Lower Higham Road to be used as an access point for compound 3a, especially given its narrow width. It should be used as an emergency access only.  Given that the Lower Higham Road is not wide enough for 2 HGVs to pass except at points where the road edge/verge/hedge has been worn away to allow two large vehicles to pass despite the fact that it is a recognised HGV route, we do not understand how a contraflow is expected to work during the period of the utility diversion works. The length of these works should be minimised, although both are shown as	The Applicant explained that the oTMPfC outlines the proposed construction routes and also proposed banned routes.  Table 2.2 of the oTMPfC states: ' <i>The Project will introduce a construction HGV ban on Lower Higham Road and provide a primary access to the A226 Gravesend Road compound from the A226 Gravesend Road.</i> '  The utility diversion works along Lower Higham Road (Work No MU26) is the replacement of a metal water pipe, which is currently located in Lower Higham Road, with a plastic pipe. This is required due to the concerns of the asset owner with regards to the movement of the earth when the tunnel boring machine	oTMPfC [Application Document <a href="#">APP-547</a> ]	Matter Agreed

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		<p>lasting 2 weeks in Table A.3 of the outline Traffic Management Plan for Construction, this conflicts with their classification in Plate A.3. Please clarify your intentions and add to Table 4.3. Disruption should be kept to a minimum.</p> <p>Higham Parish Council note comments and the short duration of closure and accept this point but are concerned about construction traffic utilising Lower Higham Road, Lower Rochester Road and Chalk Road. Noting that these roads are not in the Order Limits but should be banned for construction traffic (as per item 2.1.12).</p>	<p>(TBM) passes beneath the pipeline, which due to its age and material has a higher chance of failing or rupturing compared to a plastic equivalent pipeline. To ensure the pipeline is live and ensure customer supplies for as much of the works as possible, the new pipeline is proposed along the southern verge, limiting works within the carriageway and in proximity to the pipeline to those points at each end where the new pipeline connects to the existing. In the absence of knowing the exact point of connection and the separation afforded to the workforce and the public from each other, temporary traffic management has been proposed within the oTMPfC by way of a single lane closure along the works site. This will enable traffic to pass the workforce on the northern lane controlled by signals. The workforce will access the site via the A226 Gravesend Road compound from the A226 as opposed to along Lower Higham Road as shown on Plate 4.6 of the oTMPfC.</p>		

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			The Applicant will continue to engage with Higham Parish Council to clarify the utility diversion works.		
Mitigation  Construction	2.1.16	Higham Parish Council would like to see the inclusion of the points made re cycle lanes (see item 2.1.8), traffic lights (see item 2.1.13), use of Lower Higham Road and access to the crematorium within the Control Documents – CoCP, oTMPfC, etc.  Higham Parish Council acknowledge the commitments regarding Lower Higham Road and the Crematorium. We will continue discussions with National Highways on items 2.1.8 and 2.1.13 separately therefore agree to this item to close this matter.	Commitments from the Applicant have already been made regarding Lower Higham Road and the crematorium within the oTMPfC (see Tables 2.2 and 2.3).  The Applicant explained that the oTMPfC has been produced following its work with the relevant local authorities, businesses and emergency services. Once appointed, the Contractor would produce a Traffic Management Plan for Construction in accordance with the oTMPfC for their use when working on the new road.	oTMPfC [Application Document <a href="#">APP-547</a> ]	Matter Agreed
Compensation/ funding  Construction compensation	2.1.17	Higham Parish Council feel that National Highways consider ways to "compensate" local communities for the massive impact during the construction phase and the longer-term implications for residents once the tunnel and the approach road are operational.  Higham Parish Council have agreed this matter on the basis that a community fund will be available as set out by National Highways.	The Applicant notes Higham Parish Council's position on this matter. Since this comment was made there has been an establishment of a Lower Thames Crossing Community Legacy Forum to assess potential areas for enhancement which included Higham Parish Council representation and input.  Some of the ideas raised in the workshops and other meetings have	N/A	Matter Agreed

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			<p>not yet been taken further but will continue to be developed as the Project progresses.</p> <p>The Applicant will provide two community funds. The two funds of £1.26 million (£180,000 per year for seven years) and £0.63 million (£90,000 per year for seven years) (indexed) are to be administered and assured by the Essex Community Foundation and Kent Community Foundation respectively.</p> <p>It should also be noted that the Applicant has now allocated over £40 million of Designated Funds that can be awarded to local organisations to deliver projects that:</p> <ul style="list-style-type: none"> <li>• Enhance the environment;</li> <li>• Protect and conserve heritage assets;</li> <li>• Promote active travel; and</li> <li>• Invest in local communities</li> </ul> <p>Full funding criteria can be found online at <a href="https://nationalhighways.co.uk/our-roads/lower-thames-crossing/community-hub/community-">https://nationalhighways.co.uk/our-roads/lower-thames-crossing/community-hub/community-</a></p>		

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			<a href="#">fund/</a> and has been shared with Higham Parish Council.		
Construction traffic impacts  Construction – traffic management measures	2.1.18  RRE	Higham Parish Council would like to clarify what traffic management measures will be put in place to manage and alleviate the predicted higher levels of HGVs in the local area during construction.	The Applicant explained that HGVs will be banned from some routes, as outlined in oTMPfC. The use of the strategic road network and local road network is required to deliver the works. Existing restrictions will be respected.  The Applicant explained that the oTMPfC has been produced following its work with the relevant local authorities, businesses and emergency services. Once appointed, the Contractor would produce a Traffic Management Plan for Construction in accordance with the oTMPfC for their use when working on the new road.  Temporary offline haul routes will be constructed directly off the strategic road network where possible.	oTMPfC [Application Document <a href="#">APP-547</a> ]	Matter Not Agreed
Construction traffic impacts	2.1.19  RRE	Higham Parish Council would like to clarify the level of involvement they would have in the proposed traffic management measures for construction traffic.  Higham Parish Council note the representation at Traffic Management Forum as detailed in oTMPfC but would	The Applicant explained that Higham Parish Council will be represented at the Traffic Management Forum and will be able to raise any concerns during the works.  The Traffic Management Forum, as detailed in the oTMPfC, will work	oTMPfC [Application Document <a href="#">APP-547</a> ]	Matter Not Agreed

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Construction traffic exclusion zones		request that SoCGs and PADS Trackers are taken into consideration by contractors at commencement of construction planning and engagement and would like this reflected in paragraph 5.2.3 of the CoCP.	collaboratively to ensure appropriate planning and coordination of traffic management measures required for the Project construction works packages, and other schemes, would take place to avoid potential conflicts and minimise disruption to road users.  The Applicant explained to Higham Parish Council that the purpose of the SoCGs and PADS Trackers were to assist the Examining Authority with regards to matters that require further discussion to inform the examination timetable and issue specific hearings. Therefore, the Applicant does not consider it appropriate to include the requested text in the CoCP.		
<b>Operation and maintenance</b>					
Smart motorway systems	2.1.20  RRE	Higham Parish Council wish to express great concern over the use of Smart Motorway Systems on the route. They note that whilst the Lower Thames Crossing is not categorised as a smart motorway as such, it is one in nature.	The Applicant confirms that the proposed A122 Lower Thames Crossing would operate as an all-purpose trunk road.	N/A	Matter Not Agreed
Roads and infrastructure	2.1.21	Higham Parish Council is not convinced that the service road to the tunnel will remain as a service road and are concerned it will	The Applicant confirmed that the link road to the South Portal would only	N/A	Matter Agreed

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Tunnel service road		suffer the same fate as the area around the Dartford Tunnel. Higham Parish Council require the area to be properly gated and controlled. Higham Parish Council ask National Highways to confirm that the access slip road arrangement on the Gravesend Road/A226 are still confirmed as maintenance usage only? and that no scope creep can happen after?	be for emergency and National Highways vehicles.		
<b>Charging</b>					
Local Residents' Discount Scheme  Charging	2.1.22	Higham Parish Council would like a firmer confirmation (rather than an intention) that Gravesham residents will be entitled to discounts for journeys made through the tunnels as Dartford residents are now. Higham Parish Council note the Road User Charging Statement and on this basis agreed this matter.	Schedule 12 to the draft DCO contains the powers for the Secretary of State to provide a Local Residents' Discount Scheme (LRDS) on the same basis as Dartford (for Thurrock and Gravesham).	Road User Charging Statement [ <a href="#">Application Document APP-517</a> ] draft DCO [ <a href="#">Additional Submission AS-038</a> ]	Matter Agreed
<b>Traffic and economics</b>					
Modelling methodology	2.1.23	Higham Parish Council believe that the traffic flow modelling is fundamentally flawed as it appears to fail to take into account existing width restrictions and signposting. Higham Parish Council would like to know how the Project works will co-ordinate with	The traffic model is built in line with the Department for Transport's Transport Analysis Guidance and standards as set out in the Design Manual for Roads and Bridges. The model has been assessed by an	Transport Assessment [ <a href="#">Application Document APP-529</a> ]	Matter Not Agreed

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Traffic modelling		<p>the Nuralite works, A289 &amp; Hoo Infrastructure Plan works &amp; Swanscombe London Resort.</p> <p>Higham Parish Council would like to know if Lower Thames Crossing are doing any more modelling? Both for the construction phase and once the route is operational?</p>	<p>independent assessor within National Highways and has been accepted as suitable for assessing the impact of the Project on the highway network. While the model does include a range of detailed network parameters to reflect existing conditions, such a model can never reflect the conditions on every road, particularly those on the local road network.</p> <p>Updated operational modelling and more details of the impacts during construction were shared at the Community Impacts Consultation in summer 2021.</p> <p>The Project's Transport Assessment contains outputs and analysis of both the construction and operational phases of the Project using the latest modelling. This modelling represents updated analysis from that presented at Community Impacts Consultation.</p>	<p>Combined Modelling and Appraisal Report [Application Document <a href="#">APP-518</a>]</p>	
<b>Wider Network Impacts</b>					
Monitoring approach	2.1.24	<p>Higham Parish Council note the 3 year long term monitoring that will take place post opening but would like to understand how local communities can feedback after the initial opening?</p>	<p>Monitoring would be conducted in the year before the Project opens to establish a baseline, then one and five years after the Project opens.</p>	<p>WNIMMP [Application Document <a href="#">APP-545</a>]</p>	Matter Not Agreed



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Long-term monitoring			The management of the strategic road network is the responsibility of The Applicant, and the remainder of the road network is the responsibility of other highway authorities, who work with local planning authorities. It is appropriate that authorities with accountability for the management of planning and the road network be formally consulted on the relevant matters. Other organisations will be able to make representation into the process through their local planning authorities.		
Non-Project highway improvements  Wider Network Impacts – A229/M2	2.1.25	<p>Higham Parish Council are of the opinion it is essential that the wider road network is reviewed and that the improvements and upgrades are factored in, costed and funded - particularly the A227, A228, A229 and A249.</p> <p>Higham Parish Council appreciate that the wider network issues (e.g., A229/M2) are not within the scope of the Project works but question what National Highways are doing to join up with Kent County Council to dovetail works to produce the best overall result for the Kent network?</p> <p>Higham Parish Council, specifically point out that the current proposals indicate that a lot of new vehicle movements resulting from the</p>	<p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>An updated WNIMMP is included in the DCO application, providing</p>	WNIMMP [Application Document <a href="#">APP-545</a> ]	Matter Not Agreed

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		<p>crossing can be expected around Junction 3 of the M2. Higham Parish Council have previously raised the need for this junction to be included in National Highways' proposals but have been told that it was not part of the Project and should not be included in our consideration. Higham Parish Council are pleased that National Highways now appear to accept that this area will have increased traffic flows as traffic from the Channel Tunnel uses the A229 to reach the Lower Thames Crossing. The existing junction needs to be upgraded simultaneously with construction of any new crossing east of the M25.</p> <p>Higham Parish Council state that M20/A229/M2 junctions must be completed prior to the opening of the Project. M20/M25/A2 will not be able to support additional traffic nor the M20/A229/M2 in the event that the junction is not upgraded and routes such as A249, A228 and A227 will be gridlocked.</p> <p>Consideration should also be assessed as to the climate, environmental and fuel economy and traffic management impact of traffic having to traverse the two additional</p>	<p>information about the proposed traffic monitoring.</p> <p>The Applicant note the additional comments with regards to roads on the Wider Network and will respond in the next iteration of the SoCG.</p>		

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		<p>4km each hills of the M<sup>2</sup> when HGV will be most polluting and slow.</p> <p>Consideration for the cost of both this project and the LTC should be combined when considering Cost Benefit ratio.</p>			
<p>Local Wider Network Impacts concerns</p> <p>Wider Network Impacts – A2/M2</p>	<p>2.1.26</p> <p>RRE</p>	<p>Similarly, Higham Parish Council have concerns that traffic will divert from Folkestone to use the A2/M2 and not the M20 to travel to/from the Channel crossings. The current two lane section of the M2 is already heavily congested at times and is not capable of taking more heavy goods traffic without bringing it to a standstill (as it already is at times, even without an 'incident').</p>	<p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>An updated WNIMMP is included in the DCO application, providing information about the proposed traffic monitoring.</p>	<p>WNIMMP [Application Document <a href="#">APP-545</a>]</p>	<p>Matter Not Agreed</p>
<p>Local Wider Network Impacts concerns</p>	<p>2.1.27</p>	<p>Higham Parish council understand that National Highways are predicting a significant increase on a number of roads in the general area, such as the A227,</p>	<p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies</p>	<p>WNIMMP [Application Document <a href="#">APP-545</a>]</p>	<p>Matter Not Agreed</p>

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Wider Network Impacts mitigation on local roads	RRE	<p>Henhurst Road, Pear Tree Lane, Thong Lane and urban roads such as Valley Drive and Hall Road. How will National Highways mitigate the effects of such increases (in some cases the increase is over 20%)?</p> <p>Higham Parish Council believe that the changed designs look likely to affect traffic flows and volumes in Higham Village and data supplied indicates that there could be increased traffic on the A226 traversing Higham and at the junction with the Wainscott Bypass.</p> <p>The increase in traffic flows leave Higham Parish Council greatly concerned about the impact on the small/narrow country roads which are not going to cope with increases both from construction traffic and normal traffic levels once the Lower Thames Crossing is open let alone when a problem arises either in the Lower Thames Crossing area or at Dartford.</p> <p>There is concern about the model and National Highways statements about the unreliability/accuracy of outputs in relation to A226 and narrow, often single track, village roads Will National Highways share the outcomes of the modelling of the roads in Higham? i.e., the non- primary roads. How do National Highways categorise the A226?</p>	<p>issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>An updated WNIMMP is included in the DCO application, providing information about the proposed traffic monitoring.</p>		

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		What are National Highways plans to mitigate the impact of increases in traffic flows in current low/medium flow areas? There will be an impact on Higham Parish Council residents even though these might be below the National Highways thresholds for concern?			
Wider Network Impacts concerns  Brewers Road junction	2.1.28	Higham Parish Council believe that the inability of traffic at the Brewers Road junction on the A2 to join the A2/M2 eastbound it uses Pear Tree Lane and the A226, or the new local road to join the bypass and then effectively U turn at the A226 junction, means that there will be a lot of confusion and inappropriate traffic on local roads caused by drivers failing to turn off in time.  Higham Parish Council would like to know National Highways plans to manage the fall-out on village roads from this? Is the Design frozen or will National Highways re-visit this?	The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.  An updated WNIMMP is included in the DCO application, providing information about the proposed traffic monitoring.	WNIMMP [Application Document <a href="#">APP-545</a> ]	Matter Not Agreed
Wider Network Impacts concerns	2.1.29	Rat runs onto the village roads are of great concern to Higham Parish Council and they ask what can be done to minimise and mitigate these when incidents occur?	The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the	WNIMMP [Application Document <a href="#">APP-545</a> ]	Matter Not Agreed

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Rat runs	RRE	<p>In additional Higham Parish Council have concerns that Brewers Road junction will have to wait until 5 years after opening to assess if measures need to be taken, especially if National Highways are aware of the issues outlined here and in conversations over the last 2 years? Surely the 5 years after opening assessment is for unforeseen issues.</p> <p>Higham Parish Council ask whether National Highways have any plans for managing traffic flow within the centre of the village? (Villa Road, Forge Lane, School Lane, Taylors Lane, Telegraph Hill, Hermitage Road) to ensure/enable local journeys to take place with minimum impact:</p> <ul style="list-style-type: none"> <li>• Speed, weight, width limits?</li> <li>• Traffic calming?</li> <li>• How would any measures be monitored/enforced?</li> </ul> <p>Higham Parish Council also ask for the proposals for modification to the junction of the A226/Pear Tree Lane/Villa road and whether National Highways anticipate these as temporary changes or permanent?</p> <p>Higham Parish Council request roads in the Village to be banned for construction traffic and “access only” for cars.</p>	<p>road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>An updated WNIMMP is included in the DCO application, providing information about the proposed traffic monitoring.</p> <p>The Applicant has explained the approach to HGV. The oTMPfC outlines the proposed construction routes and also proposed banned routes.</p>	oTMPfC [Application Document <a href="#">APP-547</a> ]	

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Local Wider Network Impacts concerns  Traffic forecasts	2.1.30	<p>Higham Parish Council are disappointed that there is no sign of traffic forecasts for most of the rural roads. There is some indication of increased levels of traffic on the rural roads – these are often narrow roads – which will have a massive impact on local residents. Higham Parish Council are very concerned about increases to traffic movements in ‘normal’ conditions, but when any incidents happen at Dartford now the local networks are hugely affected. It is essential that the wider road network is reviewed and that improvements and upgrades are factored in, costed and funded - particularly the A227, A228, A229 and A249.</p> <p>Also the A229/M2 junction, which cannot cope with current traffic levels</p> <p>What are your plans for maintenance regimes for the roads which have increased volumes of traffic?</p> <p>Higham Parish Council are still very concerned about National Highway traffic model’s predictions on increasing traffic on local roads which are not suitable for taking the proposed increased traffic flows, and also the potential for ‘rat running’ if there is an incident. When there are problems on the Dartford Crossing at present, we already experience this as drivers (including HGVs)</p>	<p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>An updated WNIMMP is included in the DCO application, providing information about the proposed traffic monitoring.</p> <p>The Wider Network Impacts Management and Monitoring Policy Compliance (contained within the Transport Assessment Appendix F) includes a reference to A229 Blue Bell Hill M2 and M20 junctions in paragraph 1.2.9.</p>	<p>WNIMMP [Application Document <a href="#">APP-545</a>]</p> <p>Transport Assessment – Appendix F - Wider Network Impacts Management and Monitoring Policy Compliance [Application Document <a href="#">APP-535</a>]</p>	Matter Not Agreed

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		<p>try to avoid the congestion on the A2. In these circumstances, HGV drivers seem to ignore road restrictions, such as width and weight limits, causing significant blockages on local roads. More thought, planning and consideration is needed about this. We have also observed that the model changes traffic flows in places which are not logical (e.g. somewhere without a traffic junction) which still causes us to question the veracity of the model (as does the reduction in through lanes mentioned above).</p>			
Non-LTC highway improvements	2.1.47 (OFH1)	Higham Parish Council request that the DCO includes an obligation for roads in Kent to be improved prior to opening of the LTC.	<p>The Applicant agrees that there are some likely increases in traffic on some parts of the road network in Kent, which will in part be caused by the Project, but not wholly, and this is set out within Chapter 7 of the Transport Assessment. There will also be many traffic benefits across the network, and, overall, these outweigh the disbenefits. While the Applicant does not consider that there are any transport impacts requiring mitigation by the Project, nor any subsequent intervention options needed, it notes that:</p> <ul style="list-style-type: none"> <li>The Applicant is considering the need for enhancements along</li> </ul>	Transport Assessment [Application Document <a href="#">APP-529</a> ]	Matter Under Discussion



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			<p>the A2/M2 corridor which are within the Road Investment Strategy 3 pipeline.</p> <ul style="list-style-type: none"> <li>• The Applicant is continuing to progress the M2 junction 5 project separately to the A122 Lower Thames Crossing.</li> <li>• The Applicant maintains a route strategy for the M25 south of the proposed connection with the A122 Lower Thames Crossing, the M20, A2 west of the junction with the Lower Thames Crossing, and to the M2 east of junction 1.</li> </ul> <p>In addition, The Applicant has agreed a scope of work and has funded this through a Planning Performance Agreement for Kent County Council to undertake a Strategic Outline Business Case (SOBC) study to identify the potential traffic changes on the Kent road network as a result of the Project and to assess the outline business case of potential interventions to optimise the network.</p> <p>The outputs of this study will allow Kent County Council to make informed representations during the DCO examination and will enable</p>		

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			Kent County Council to develop more advanced business cases over the course of the next 10 years through existing processes. As such, it is not agreed that mitigation via upgrades should be provided within the Project for the identified effects in order to successfully make use of the scheme's benefits should the Project be implemented.		
<b>EIA methodology</b>					
Assessment methodology EIA Assessment Method	2.1.31	Higham Parish Council understand that the Environmental Impact Assessments have not been completed and that further matters may require consideration following announcements expected this autumn related to mitigating any effects of infrastructure projects on Climate Change. Will there be further consultation on environmental matters once the assessments have been finalised? Higham Parish Council disagree that ancient woodland with its eco systems at a micro level developed over a century or more can just be uplifted and placed elsewhere.	The Applicant explained that an Environmental Impact Assessment is an iterative process and once completed will form the ES of the DCO application. There will not be further consultation on the extent of effects.  The Applicant agrees that an ancient woodland could not be moved without impact, and that the Project presents a significant environmental effect on the ancient woodland. the Applicant proposes to provide a level of compensation, with an understanding that it is not possible to fully compensate for the loss of	N/A	Matter Not Agreed

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			ancient woodland. The Applicant is proposing to salvage the soils and use them in the woodland habitat which will be created in the area.		
<b>Air quality</b>					
Project design and mitigation	2.1.32	Higham Parish Council note that the Air Quality assessments show very high levels just south of the parish at the existing A2/M2 junction which are likely to breach air quality standards. Except on the stillest of days, air movement is likely to move the pollution around to the detriment of parishioners. The scheme should be designed so that it does not cause air quality standards to be breached in the first 15 years of operation. Higham Parish Council ask, what mitigation will be undertaken to stop this breach of air quality standards?	The Applicant explained that a detailed air quality modelling assessment is being undertaken to assess the potential air quality impacts of the Project during construction and operation. If the Project is predicted to result in significant air quality effects according to the guidance by which road infrastructure projects are assessed in England, then mitigation would be required. The Project would then need to demonstrate that the mitigation is effective and can remove the significant effect. For air quality, mitigation measures may include techniques such as the use of roadside barriers or managed speed limits. The air quality effects of the Project, including the significance and mitigation requirements, will be fully detailed in the ES as part of the DCO application.	ES Chapter 5: Air Quality [Application Document <a href="#">APP-143</a> ]	Matter Not Agreed
Air quality mitigation	RRE				

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
Assessment of likely significant effects  Air quality impacts	2.1.33	Although the preliminary air quality assessment shows that levels of air pollutants comfortably meet air quality standards outside Gads Hill School and at other points along the A226, Higham Parish Council are still concerned.	The Applicant explained that the preliminary air quality assessment undertaken to date shows that levels of air pollutants comfortably meet air quality standards on the A226 with the Project (in vicinity of Gads Hill School). Further air quality modelling and assessment work will be undertaken for the ES, and mitigation would be required should any changes in air quality be considered significant according to national policy and guidance.  The Health Impact Assessment provides more information specifically on air quality and human health.	ES Chapter 5: Air Quality [Application Document <a href="#">APP-143</a> ] Health and Equalities Impact Assessment [Application Document <a href="#">APP-539</a> ]	Matter Not Agreed
Assessment of likely significant effects  Air quality assessments	2.1.34  RRE	Higham Parish Council feel that National Highways have not appeared to have considered other pollutants, e.g. CO2 and particulates. Higham Parish Council have asked National Highways to please provide this data.	The Applicant explained that the preliminary air quality assessment considered the impact of the Project on nitrogen dioxide and particulates at human health locations (e.g. houses). These are the only air pollutants of concern associated with traffic. emissions in the UK, when considering the risk of exceedances of air quality standards and limit values. The impact of the Project on nitrogen dioxide and particulate matter (PM <sub>2.5</sub> and PM <sub>10</sub> ) will be	ES Chapter 5: Air Quality [Application Document <a href="#">APP-143</a> ] ES Chapter 15: Climate [Application Document <a href="#">APP-153</a> ]	Matter Not Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
			presented in ES Chapter 5: Air Quality . Impacts of the Project on carbon dioxide emissions will be considered in ES Chapter 15: Climate.		
<b>Landscape and visual</b>					
Impacts  Impact on Thong Village	2.1.35	Higham Parish Council have concerns about the impact on Thong village and would like to see more cut and cover on as much of the route as possible between the tunnel and the A2/M2.	The Applicant explained that environmental mitigation has provided for Thong Village, but has been balanced against the existing heritage requirements for the village's Conservation Area. Earthworks and a wide belt of woodland planting has been designed to the south-west of the village to screen views of the junction. Open views to the west of the village have been retained where the Project road has gone into cutting. This is a key characteristic of the Conservation Area and the local landscape area as it has historically had open views. The level of tunnel lighting at the tunnel entry and exit portals (referred to as the "Threshold" zones) will be set in response to the external lighting levels recorded at the tunnel approaches and exits. This is done to allow drivers' eyes to best adjust	N/A	Matter Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
			to their new environment, i.e. to prevent a “black hole” effect upon entering the tunnel, and thereafter to prevent the “dazzling” effect when exiting the tunnel environment and re-emerging into natural daylight conditions.		
Mitigation  Landscaping safeguarding	2.1.36	Higham Parish Council are not convinced that the amount of land put aside is reasonable and would like assurances to be given that the land earmarked for tree planting etc. will have some form of long term commitment (legally binding) – so that it is kept for this purpose and will never be used for development – Businesses or Housing Development.  There needs to be a long term management plan for these areas.	The Applicant will be responsible for long-term management and maintenance of environmental mitigation unless it is agreed with a third party (usually another statutory body, such as Natural England or Forestry England) for them to manage at a later date.  The Applicant will not apply for planning consent for change of use of those environmental mitigation areas as the deviation from what is secured in the DCO would be a criminal breach of control for The Applicant.  The land required for the Project has to be clearly defined for the DCO application, and the reasons for the inclusion of compulsory powers and temporary possession for each plot of land has to be explained in a	Statement of Reasons <b>[Additional Submission AS-040]</b>	Matter Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
			document called the Statement of Reasons. Any future development outside the land required to construct, operate and maintain the Project would be decided by the relevant local planning authority or other relevant approval body. For more information about local authority aspirations for future development, refer to their relevant local plans.		
<b>Terrestrial biodiversity</b>					
Mitigation  Ancient woodland	2.1.37  RRE	Higham Parish Council do not understand how an ancient woodland can be relocated. These have developed in their own unique way over centuries as they have reacted to soil conditions, climatic events (such as the mini Ice Age), general natural events (such as storms) and human activity (e.g. collecting firewood), resulting in their current biodiversity and ecosystems. Destroying existing woodland will remove these environments forever; they cannot simply be moved or replicated. A substantial amount of carbon will be released into the atmosphere increasing climate change emissions, and any replacement planting will take decades to reproduce mature trees to replace the ones destroyed. Similarly, replacement sites	The Applicant explained that there is no proposal to relocate ancient woodland as part of the DCO application. Where practicable, ancient woodland soils will be salvaged and used as planting medium in areas identified as ancient woodland compensation planting. This helps inoculate these areas with some of the fungi and seed bank present in these soils, a process which has been shown to produce a more-diverse ground flora more rapidly than when areas are planting into a standard planting medium.	N/A	Matter Not Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
		for protected species will take many years to establish. They certainly cannot be properly established in the short period of time implied by the aim of opening the crossing in 2030.	The time taken for all ecological mitigation measures to become established and suitable for use by a range of species is taken into account within the Lower Thames Crossing impact assessment. Where habitats are required to translocate animals into, the establishment of these habitats is built into the Project programme before any translocation can occur.		
Mitigation  Ancient woodland – protection	2.1.38	Higham Parish Council state that ancient woodland compensation sites, protected species receptor sites and ecological compensation sites need to be closed off for all of them to become established and once established, public access should be restricted to protect the environments created.	The Applicant explained that establishment periods have been identified for all areas of ecological mitigation/compensation and, where necessary, public access is restricted to ensure this establishment is successful. Management of all mitigation areas would be sensitive to, and include the ability to address, recreational pressures. The management of these sites will remain the responsibility of the Applicant. Where land is not required post-construction, this will be returned to the landowner in line with its condition at the time of compulsory acquisition. In many cases this will be a return to farmland.	N/A	Matter Not Agreed



Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
Mitigation  Chalk Park	2.1.39	The shape of 'Chalk Park' is somewhat haphazard, leaving areas which will be difficult to farm with modern machinery and thought should be given to regularising the boundaries and returning areas to farmland.	The shape of Chalk Park is defined by the existing contour pattern. Areas returned to farmland retain existing gradients that are currently being farmed at (albeit raised by a few metres). Regularising the boundary would probably lose areas of land to be returned to farmland, and the Applicant's intention was to maximise the area returned.	N/A	Matter Not Agreed
<b>Material assets and waste</b>					
Assessment methodology  Material assets and waste	2.1.40  RRE	Higham Parish Council would like to see more consideration given to managing the noise and pollution during the construction phase. The amount of spoil produced during construction will be huge – it is not clear how this will be removed from the site. Higham Parish Council would like to see this clarified and guarantees given that local roads will NOT be used to remove the spoil.  Higham Parish Council ask whether spoil could be removed by rail or river?  There is insufficient detail of how some aspects of the construction will be managed e.g. removal of the spoil. The impact on the whole area will be massive for up to 7 years so Higham Parish Council urge National Highways to consider ways to reduce noise and pollution during the construction phase.	ES Chapter 12: Noise and Vibration includes noise and visual assessments from construction activities, and the CoCP and REAC provide mitigation measures on how noise and pollution will be managed during construction.  The oTMPfC details how construction traffic will be managed to mitigate effects on the local community.  The Applicant has provided an assessment on waste which quantifies the likely material arisings (e.g. spoil) and applies measures to divert from landfill. This is in ES Chapter 11: Material Assets and Waste. The REAC within the CoCP	ES Chapter 12: Noise and Vibration [Application Document <a href="#">APP-150</a> ]  ES Chapter 11: Material Assets and Waste [Application Document <a href="#">APP-149</a> ]  ES Appendix 2.2: CoCP [Application Document <a href="#">APP-336</a> ]	Matter Not Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
		<p>It is essential that the villages and urban communities are protected from construction traffic.</p> <p>Higham Parish Council ask if some of the spoil could be used for improvements to local roads?</p>	<p>(ES Appendix 2.2) will provide detail on committed mitigation such as location of stockpiles to act as noise and visual barriers.</p> <p>The Applicant has developed its commitment to river usage for material transportation and committed to a target for use of port facilities for transportation of bulk aggregates. This is defined in the updated outline Materials Handling Plan (oMHP).</p>	<p>oTMPfC [<b>Application Document APP-547</b>] ES Appendix 2.2 Annex B: oMHP [<b>Application Document APP-338</b>]</p>	
<b>Noise and Vibration</b>					
<p>Assessment of likely significant effects</p> <p>Noise assessment for the A226</p>	2.1.41	<p>Higham Parish Council pointed out that there is no assessment as to increased noise levels on the A226 during construction. Higham Parish Council to review ES Chapter 12: Noise and Vibration.</p>	<p>The Applicant explained that construction related road traffic noise effects are presented in the Community Impacts Consultation 'Construction Update' document, Chapter 7, pages 215-243. Based on data available at the time, the change in road traffic noise level along the A226 within Higham is predicted to be less than 1dB(A), which is below the threshold of human hearing, and as such the significance of road traffic noise during construction within this area would be considered to be negligible.</p>	<p>ES Chapter 12: Noise and Vibration [<b>Application Document APP-150</b>]</p>	Matter Not Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
			The full road traffic noise assessment will be presented within ES Chapter 12: Noise and Vibration.		
Assessment of likely significant effects  Noise and vibration	2.1.42	Higham Parish Council believe that Figure 2.16 within the Ward Impact Summaries is too simplistic. If there is going to be the predicted increase in traffic along the A226 and other roads as shown in Figures 2.4–2.9 of this document, then there will be an increase in noise related to the increase in traffic which will adversely affect those living and working on these roads, as well as the schools. Higham Parish Council to review ES Chapter 12: Noise and Vibration.	Based upon the currently available data, the Applicant is of the opinion the increase in traffic flow along the A226 would result in an increase in road traffic noise of less than 1dB(A) based upon the 18-hour annual average weekly traffic (AAWT), which is below the threshold of human hearing, and as such the significance of road traffic noise along the A226 would be considered to be negligible. Traffic Figures 2.4 to 2.9 also show the morning peak, interpeak and evening peak, whilst noise Figure 2.16 is based on 18-hour AAWT.  Noted. The intention was to make the ward summary information less technical to enable better public understanding of the local impacts. The full road traffic noise assessment will be presented within ES Chapter 12: Noise and Vibration.	ES Chapter 12: Noise and Vibration <b>[Application Document APP-150]</b>	Matter Not Agreed
<b>Climate</b>					
Assessment methodology	2.1.43	Higham Parish Council object to the increasing land take from previous	The Applicant has carried out Agricultural Land Classification	ES Chapter 10 Geology	Matter Not Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
Loss of agricultural land	RRE	consultations, especially prime grade 1 and 2 agricultural land. The total land take appears to have increased by about 10% or 215 hectares over the last 12 months. This dramatic increase seems mainly to be because of sites for “ancient woodland compensation”, “receptor site[s] for protected species” and “Ecology compensation planting”. The country, as set out in the Governments Food Strategy, needs to produce at least as much food as it does at present and to increase production of certain foods. Taking land out of production for reasons associated with the scheme will lead to increased imports of food, more food miles, and potentially more lorries importing food travelling on roads through Kent. All of this will work against the government’s stated aim of achieving ‘Net Zero’. Land is a finite resource and not just there for the taking. As current global events show, combined with the shortage of HGV drivers both in the UK and Europe, the more food we can produce in the UK the more robust the supply of foodstuffs will be.	surveys, the results of which are described in ES Chapter 10: Geology and Soils. These surveys assess the Project’s impact on the Best and Most Versatile land (Grades 1, 2 and 3a) and explain how impacts would be minimised.	and Soil [Application Document <a href="#">APP-148</a> ]	
<b>Nitrogen deposition</b>					
General methodology/	2.1.44	Higham Parish Council do not understand why National Highways consider a speed limit between junctions 3 and 4 is potentially	The Applicant is proposing speed limit enforcement measures (not a speed limit) to reduce the current exceedances of the speed limit	ES Appendix 5.6: Project Air Quality Action Plan	Matter Agreed

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
<p>modelling/ alternatives</p> <p>Speed limit on M2, junctions 3 and 4</p>		<p>needed as traffic will not be increased in this area.</p> <p>Higham Parish Council note that speed limit enforcement is proposed to reduce the current speed limit exceedances that are causing nitrogen deposit exceedances and accept this item.</p>	<p>which will reduce emissions, therefore reducing nitrogen deposition. Traffic data shows that the speed limit is exceeded by some motorists on some sections of the road network. Driving at faster speeds increases nitrogen emissions, so by enforcing the speed limit on certain sections of road, average vehicle speeds can be brought down, reducing nitrogen deposition on nearby designated sites.</p> <p>Following the Applicant's assessment of nitrogen deposition, it proposes installing speed cameras on the M2 between junctions 3 and 4 (once the Project is open) on top of existing enforcement measures, which would be effective in encouraging road users to drive at the legal speed limit. This location has been chosen because the Applicant's traffic modelling shows that some motorists are currently exceeding the speed limit. There would be no change to the speed limit, having considered that option in the assessments (see ES Appendix 5.6: Project Air Quality Action Plan),</p>	<p>[Application Document <a href="#">APP-350</a>]</p>	

Topic	Item No.	Higham Parish Council Comment	National Highways' Response	Application Document Reference	Status
			as that option would have led to unacceptable rerouting of traffic onto the local road network and subsequent safety issues.		

## Appendix A Engagement activity

**Table A.1 Engagement activities between the Applicant and Higham Parish Council since the DCO Application was submitted on the 31 October 2022**

Date	Overview of Engagement Activities
01/02/2023	Microsoft Teams meeting to discuss SoCG and PADS Tracker. Following the meeting, the Applicant sent some information to help with navigating the DCO application, a document with signposting for some of Higham Parish Council's SoCG items and the presentation slides for the benefit of new members.
28/02/2023	Higham Parish Council contacted the Applicant requesting the template for the PADS Tracker. The Applicant shared the email from the Planning Inspectorate with the template.
04/03/2023	Higham Parish Council shared a draft PADS Tracker with the Applicant. The Applicant responded with some advice and comments.
23/03/2023	The Applicant contacted Higham Parish Council to offer a Microsoft Teams meeting to discuss SoCGs, PADS Tracker and next steps and timescales.
06/04/2023	The Applicant contacted Higham Parish Council with a suggestion of two dates for a meeting. Higham Parish Council responded and a meeting was set for 14 April.
14/04/2023	Meeting to discuss various SoCG matters and agree some next steps on particular items. Following the meeting, the Applicant shared links to various documents requested by Higham Parish Council and a list of SoCG items with notes and actions for both parties. A follow-up meeting was set for 26 April.
26/04/2023	Meeting to discuss SoCG matters. The Applicant and Higham Parish Council agreed on some text updates to 13 SoCG items. Some matters were agreed. A follow-up meeting was set for 11 May.
11/05/2023	Meeting to discuss and review SoCG matters, including agreeing text updated to the SoCG document. Three items were agreed in principle, subject to committee approval. Next meeting agreed for June and Higham Parish Council's request for discussions with other parties on Forge Lane/Crutches Lane junction and reviewing construction routes.
15/06/2023	Meeting to discuss construction related SoCG matters with a construction team representative present. No changes to the status of matters were made. Discussion about finalising the SoCG for Examination Deadline 1. A further meeting was agreed for 3 July to review changes for Examination Deadline 2.

## Appendix B Glossary

Term	Abbreviation	Explanation
A122 Lower Thames Crossing	The Project	A proposed new crossing of the Thames Estuary linking the county of Kent with the county of Essex, at or east of the existing Dartford Crossing.
Code of Construction Practice	CoCP	Contains control measures and standards to be implemented by the Project, including those to avoid or reduce environmental effects.
Development Consent Order	DCO	Means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects (NSIP) under the Planning Act 2008.
Environmental Impact Assessment	EIA	A process by which information about environmental effects of a proposed development is collected, assessed and used to inform decision making. For certain projects, EIA is a statutory requirement, reported an Environmental Statement.
Heavy Goods Vehicle	HGV	A large, heavy motor vehicle used for transporting cargo.
Local Residents' Discount Scheme	LRDS	Accounts that offer discounts on road user charges but are subject to location-based eligibility criteria.
National Highways		A UK government-owned company with responsibility for managing the motorways and major roads in England. Formerly known as Highways England.
National Policy Statement for National Networks	NPSNN	The NPSNN sets out the need for, and Government's policies to deliver, development of Nationally Significant Infrastructure Projects on the national road and rail networks in England. It provides planning guidance for promoters of Nationally Significant Infrastructure Projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.
Nationally Significant Infrastructure Projects	NSIPs	Major infrastructure developments in England and Wales, such as proposals for power plants, large renewable energy projects, new airports and airport extensions, major road projects, etc. that require a development consent under the Planning Act 2008.
outline Materials Handling Plan	oMHP	Sets out the approach and high-level principles for handling construction materials and waste on the Lower Thames Crossing project, both inside and outside the Order Limits.
outline 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 TMP supports the DCO application and would be embedded within the eventual construction contractor documentation and will form an overarching and



<b>Term</b>	<b>Abbreviation</b>	<b>Explanation</b>
		comprehensive management procedure for the Contractor to adhere to.
Public Right of Way	PRoW Network	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).
Statement of Common Ground	SoCG	A Statement of Common Ground is a written statement containing factual information about the proposal which is the subject of the appeal that the appellant reasonably considers will not be disputed by the local planning authority.
Wider Network Impacts Monitoring and Management 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.

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