

Lower Thames Crossing

5.4.1.1 Draft Agreed Statement of Common Ground between (1) National Highways and (2) the Environment Agency (Clean version)

APFP Regulation 5(2)(q)

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

Volume 5

DATE: July 2023
DEADLINE:1

Planning Inspectorate Scheme Ref: TR010032
Application Document Ref: TR010032/APP/5.4.1.1

VERSION: 2.0

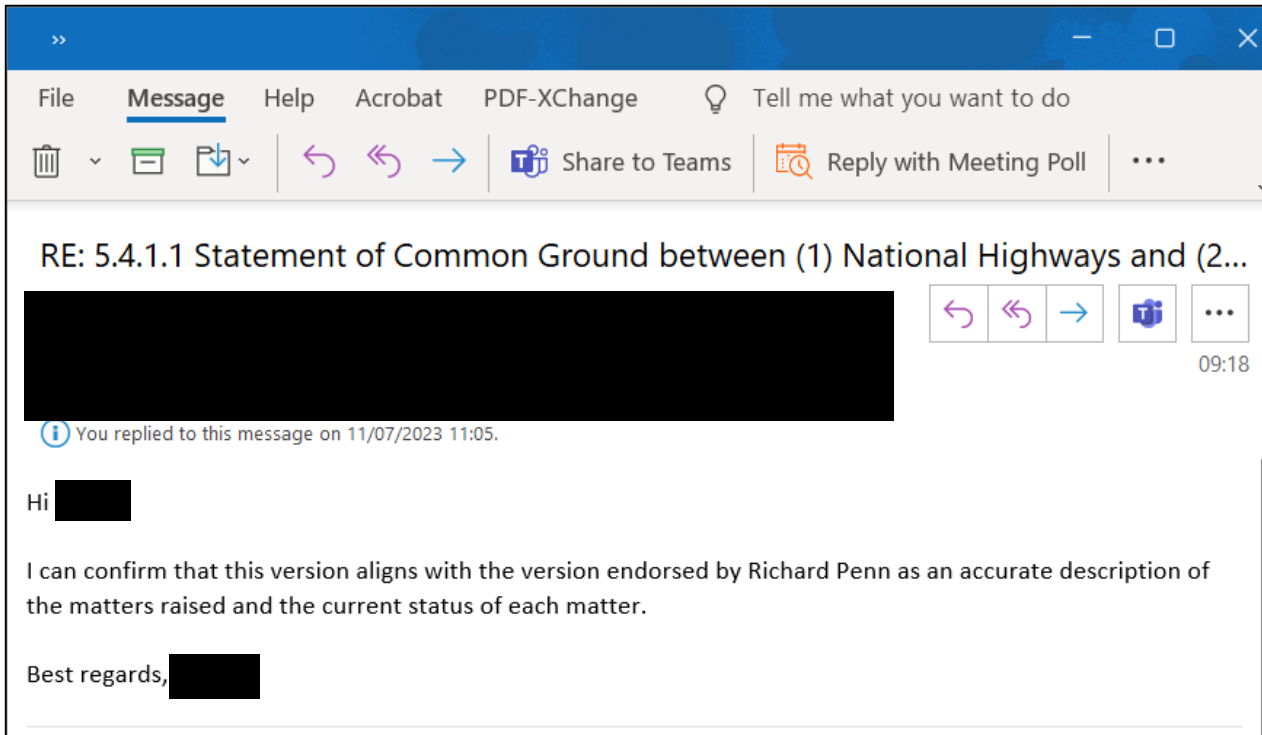
Revision history

Version	Date	Submitted at
1.0	31 October 2022	DCO Application
2.0	18 July 2023	Examination Deadline 1

Status of the Statement of Common Ground

This is an Agreed Draft Statement of Common Ground with matters outstanding.

National Highways and the Environment Agency agree that this draft Statement of Common Ground is an accurate description of the matters raised and the current status of each matter.



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

Lower Thames Crossing

5.4.1.1 Draft Agreed Statement of Common Ground between (1) National Highways and (2) the Environment Agency (Clean version)

List of contents

	Page number
1 Introduction	1
1.1 Purpose of the Statement of Common Ground	1
1.2 Principal Areas of Disagreement	1
1.3 Terminology	1
2 Matters	2
2.1 Movement of outstanding matters.....	2
Appendix A Engagement Activity	37
Appendix B Glossary	39
Appendix C Documents considered within this Statement of Common Ground.....	42
Annex C.1 Environment Agency Statutory Consultation Response	43
Annex C.2 Environment Agency Supplementary Consultation Response	58
Annex C.3 Environment Agency Design Refinement Consultation Response	64
Annex C.4 Environment Agency Community Impact Consultation Response.....	69
Annex C.5 Environment Agency Local Refinement Consultation Response.....	72
Annex C.6 Tilbury Main Diversion Options, Choosing By Advantage Light (HE540039-CJV-GEN-GEN-MIN-DCO-00002)	75
Annex C.7 WFD Implications of Culverting Tilbury Main (HE540039-CJV-GEN- GEN-MIN-STK-00801)	84
Annex C.8 Coalhouse Point Mitigation Water Supply Structure (HE540039-LTC- EWE-S07-REP-ENV-00001)	90
Annex C.9 Flood Risk Assessment – Climate Change (HE540039-CJV- EFR-TNT- ENV-00011).....	99
Annex C.10 Flood Risk Assessment – Future Thames Barrier Breach Modelling (HE540039-CJV-EFR-GEN-TNT-ENV-00101)	109
Annex C.11 Bowaters Sluice and East Tilbury Tidal Wall Monitoring Assessment (HE540039-LTC-GEN-GEN-TNT-TPI-00001)	124
Annex C.12 Agreed Statements.....	147

List of tables

	Page number
Table 2.1 Matters.....	3
Table A.1 Engagement activities between the Applicant and the Environment Agency since the DCO Application was submitted on the 31 October 2022.....	37

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 the Environment Agency, and where agreement has not been reached. Where matters are yet to be agreed, the parties will continue to work proactively to reach agreement and will update the SoCG to reflect areas of further agreement.
- 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 The Environment Agency elected not to produce a PADS Tracker at pre-examination stage, indicating to the Applicant that they were content that the number of outstanding matters within the SoCG was insufficient to warrant the exercise.

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 the Environment Agency, 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 It is acknowledged there are some matters where further discussion may take place during the detailed design stage of the Project to finalise detail, but the matter is agreed in principle. Matters to which this applies have an asterisk (*) next to them.
- 2.1.3 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 and 'DLX' indicates a new matter added during examination at/around that deadline.
- 2.1.4 The following matters have moved from 'matter under discussion' to 'matter agreed':
- a. 2.1.28
- 2.1.5 The following matters remain 'matter under discussion', but have been updated:
- a. 2.1.35
- 2.1.6 The following matters have moved from 'matter not agreed' to 'matter under discussion'
- a. 2.1.7
- 2.1.7 Table 2.1 details and presents the matters which have been agreed, not agreed, or are under discussion between (1) the Applicant and (2) the Environment Agency.
- 2.1.8 In Table 2.1, relevant issues relating to the dDCO articles and Requirements in Schedule 2 to the dDCO have been identified under the heading 'DCO and Consents'.
- 2.1.9 At Examination Deadline 1 there are 73 matters in total, of which 67 matters are agreed, 3 matters are not agreed and 3 matters that remain under discussion.

Table 2.1 Matters

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
DCO and consents					
Environmental Permits	2.1.1 RRE	The applicant will need to identify where permissions such as environmental permits and abstraction licences are required.	<p>Environmental permits and abstraction licences will be applied for as required by the Contractor(s).</p> <p>The need for environmental permits and abstraction licences is noted in the Consents and Agreements Position Statement.</p> <p>The Applicant is developing an environmental permitting strategy in collaboration with the Environment Agency.</p>	Consents and Agreements Position Statement [Application Document APP-058]	Matter Agreed
Environmental Permits	2.1.2 RRE	Discharges from construction compounds are required to be permitted by the Environment Agency.	Pre-application advice has been sought from the Environment Agency on discharges at the North and South Portals. It is agreed that environmental permits for discharges would be in accordance with REAC Commitment RDWE033 'Discharge from construction of South Portal' and REAC Commitment GS022 'North Portal' (Code of Construction Practice (ES Appendix 2.2)).	ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
Flood Risk Activity Permits (FRAP)	2.1.3 RRE	<p>The Environment Agency initially advised that a FRAP is likely to be required if works are proposed within 8m of the bank of a main river, or 16m of a tidal main river. It would also be required within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river.</p> <p>The Environment Agency has subsequently agreed in principle with The Applicant's request that the Environment Agency agrees to disapply the requirement for FRAPs. Such agreement is conditional on the inclusion of Protective Provisions acceptable to the Environment Agency within the DCO.</p>	<p>The Applicant considers that flood risk activities could be addressed via protective provisions for the Environment Agency in the draft DCO. A form of protective provisions has been agreed with the Environment Agency excepting paragraph 116(5) which relates to waste permitting issues.</p>	<p>Draft Development Consent Order [Additional Submission AS-038]</p>	Matter Under Discussion
Co-ordinating parallel consents and other Appropriate Assessment	2.1.4	<p>The Environment Agency considers that the consultation on the mitigation requirements and the permitting of them has been constructive. The Environment Agency recommends that permits are applied for in appropriate time to facilitate the effective implementation of the mitigation, subject to the Environment Agency's pre-application advice regarding further assessment being undertaken at detailed design stage.</p>	<p>In accordance with the 2022 update of Planning Inspectorate's Advice Note Ten: Habitats Regulations Assessment relevant to Nationally Significant Infrastructure Projects), Sections 5.3 to 5.6, the Applicant has consulted with the Environment Agency and Natural England with regard to the need for two Environment Agency permits in relation to mitigation measures proposed within the Habitats Regulations Assessment (HRA), namely the discharge permit for the construction discharge from the</p>	<p>HRA [Application Documents APP-487 and APP-488]</p>	Matter Agreed*

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		The Environment Agency would undertake their own HRA as a competent authority on permits which it issues.	southern tunnel entrance compound; and the provision of a water control structure in the sea defences at Coalhouse Point to facilitate wetland creation.		
Protective Provisions	2.1.5	<p>The Environment Agency shared their standard Protective Provisions for flood risk activities with the Applicant in 2019. The Applicant shared their draft amendments in December 2020.</p> <p>The Environment Agency has subsequently updated their standard flood risk Protective Provisions. These were shared with the Applicant on 4 July 2022. The Applicant provided comments on the protective provisions, which the Environment Agency has now responded to. The form of protective provisions is agreed excepting paragraph 116(5) which relates to permitting issues.</p>	<p>The Applicant shared their draft amendments to the Environment Agency's standard flood risk Protective Provisions in December 2020. The Environment Agency did not provide comments on this drafting but has subsequently updated their standard Protective Provisions, which relate to flood risk activities, and shared these with the Applicant on 4 July 2022.</p> <p>A form of protective provisions has been agreed with the Environment Agency excepting paragraph 116(5) which relates to waste permitting issues</p>	Draft Development Consent Order [Additional Submission AS-038]	Matter Under Discussion
Protective Provisions	2.1.6	The Environment Agency has considered the Applicant's proposal to disapply the Environmental Permitting (England and Wales) Regulations 2016 (as amended) (EPR 2016) with respect to waste operations, through a series of technical and legal discussions, and formal papers, and has also considered	<p>The Project approach to Environmental Permitting with respect to waste operations has been under discussion with the Environment Agency since 2019.</p> <p>The Applicant had proposed to seek disapplication of the EPR 2016 relevant to waste operations, due to</p>	Draft Development Consent Order [Additional Submission AS-038]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		<p>the drafting for a new set of Protective Provisions proposed by the Applicant in relation to this disapplication.</p> <p>The Environment Agency does not agree that the disapplication of the EPR 2016 with respect to waste operations is appropriate or necessary and are not willing to give consent under section 150 of the Planning Act 2008 to the disapplication of the relevant provisions.</p>	<p>the complexity of the interactions between existing permitted operations at the North Portal construction area with any permits that might be required by the Project for waste operations during construction.</p> <p>Following extensive and considered engagement between the technical and legal teams, the Environment Agency concluded that they did not support this approach.</p> <p>The Applicant has considered the Environment Agency's detailed feedback and has agreed not to disapply the need for an environmental permit for waste operations under the EPR 2016. Accordingly, the Applicant no longer seeks the Environment Agency's consent under section 150 of the Planning Act 2008 in respect of such a waste permit.</p>		
Protective Provisions	2.1.7 RRE	<p>The Environment Agency has been provided with drafting of Protective Provisions with respect to environmental permits issued under the EPR 2016 that are held by third parties and may interact with land that is inside the Project's Order Limits and therefore the Project's construction operations.</p>	<p>The Applicant has provided drafting of protective provisions to the Environment Agency for review, with respect to the EPR 2016.</p> <p>This is in relation to existing environmental permits held by third parties, where the Applicant has no control over the permit or third party operations, but the permit relates to</p>	<p>Draft Development Consent Order [Additional Submission AS-038]</p>	<p>Matter Under Discussion</p>

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		<p>The Environment Agency has indicated it is very unlikely to agree to the inclusion of this paragraph in the Protective Provisions,</p>	<p>land that is within the Project's Order Limits.</p> <p>The drafting is intended to afford the Applicant and third parties protection against enforcement action in relation to any such existing environmental permits, in the event that construction operations for the Project do not align with activities authorised by an environmental permit held by a third party, but over which the Applicant has no control.</p> <p>Several meetings have been held with the Environment Agency to discuss permitting. The Applicant hopes to agree wording relating to the EPR 2016 with the Environment Agency prior to the close of the examination. Formal feedback on the permitting drafting at paragraph 116(5) of the protective provisions is currently awaited.</p>		
Tunnel Protection Zones.	2.1.8 RRE	<p>The Environment Agency has asked for clarifications regarding works within tunnel protection zones.</p>	<p>The tunnel protection zones are related to works restrictions for protection of the tunnel. In the first protection zone no activities are allowed, and in the second protection zone dredging and maintenance is allowed (works undertaken by the Port of London Authority) and other activities only after consent by the</p>	<p>River Restrictions Plan [Application Document APP-045] Draft Development Consent Order [Additional</p>	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
			undertaker (National Highways). The tunnel protection zones are detailed in the River Restrictions Plan, which was shared with the Environment Agency. Text from article 48 of the draft Development Consent Order was also shared with the Environment Agency and no comments have been received to date.	Submission AS-038	
Route selection, model alternatives and assessment of reasonable alternatives					
Route Selection	2.1.9	The Environment Agency agrees that Option C is the preferred route for the Lower Thames Crossing.	Noted.	N/A	Matter Agreed
Sustainability					
Legacy and benefits	2.1.10	Further to initial concerns about the Project's approach to legacy and benefits in 2019, the Environment Agency now agrees with the approach to legacy and benefits working groups. The Environment Agency regularly attends legacy and benefits workshops, including the Marshes and Rivers sub-group of the Environment Legacy Steering Group. The Environment Agency is pleased at the progress being made by this group to organise a structure for allocating funds to environmental improvement projects.	Noted.	N/A	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		They look forward to continuing to support the group into the future.			
Terrestrial biodiversity					
Methodology & baseline	2.1.11	The Environment Agency agrees with the ecological survey methodologies.	Ecological survey methodologies have been agreed with the Environment Agency.	ES Chapter 8: Terrestrial Biodiversity [Application Document APP-146]	Matter Agreed
Methodology & baseline	2.1.12	Essex Field Club data should be included in the ecology baseline data.	Data received from Essex Field Club has been included in the ecology baseline.	ES Chapter 8: Terrestrial Biodiversity [Application Document APP-146]	Matter Agreed
Impact	2.1.13	Insufficient information was provided in the Preliminary Environmental Impact Report (PEIR) on potential environmental impacts, however, the level of information subsequently provided to the Environment Agency regarding environmental impacts is appropriate.	The Applicant agrees that the level of information provided to the Environment Agency is appropriate. A series of workshops have been held to discuss the Project's impact, mitigation and enhancement, along with technical meetings, where required. Drafts of the Application Documents were shared with the Environment Agency in December 2020, and the updated Application Documents have subsequently been shared, where relevant to the Environment Agency's function.	ES [Application Documents APP-138 to APP-486]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
Impact	2.1.14 RRE	<p>It should be assumed that eels are present in all watercourses along the LTC route.</p> <p>It is agreed that the Applicant's contractors will adopt best practice for eel and fish passage through culverts.</p>	<p>The effects on fish and eels are detailed in ES Chapter 8: Terrestrial Biodiversity which concludes no significant effects to fish and eels. The assessment assumes that eels and minor fish species are present in catchments.</p> <p>Good practice for the design and operation of culverts with respect to elvers is detailed in Part 10 of the Flood Risk Assessment (FRA) (ES Appendix 14.6).</p>	<p>ES Chapter 8: Terrestrial Biodiversity [Application Document APP-146]</p> <p>Part 10 of ES Appendix 14.6: FRA [Application Document APP-477]</p>	Matter Agreed
Impact	2.1.15 RRE	<p>The watercourses surrounding the Thames Estuary and Marshes directly feed into this protected area and are likely to be of high ecological value. The Applicant should not impact the flora and fauna of these watercourses during and after construction. The Environment Agency requested that further ecological and water sampling (conductivity) of the drains and ditches in and around the Thames Estuary and Marshes Ramsar was undertaken to understand how this sensitive environment works. The Environment Agency is now satisfied that sampling of water in the drains and ditches in the Ramsar is now complete.</p>	<p>Baseline ecological and water quality surveys were undertaken in the watercourses in and adjacent to the Thames Estuary and Marshes between 2021-2022 as requested by the Environment Agency. These are presented in the ES.</p> <p>The impact of the Project on the Thames Estuary and Marshes has been assessed in ES Chapter 8: Terrestrial Biodiversity, which concludes that the impacts on the Site of Special Scientific Interest (SSSI) are not significant. This impact is also assessed in the HRA, which concludes there would be no Likely Significant Effects from changes in water quality.</p>	<p>ES Chapter 8: Terrestrial Biodiversity [Application Document APP-146]</p> <p>HRA [Application Documents APP-487 and APP-488]</p> <p>ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]</p> <p>ES Appendix 14.7: Water Framework</p>	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		<p>It is also agreed that the Project will need to ensure that it meets the requirement of the Environmental Permitting Regulations 2016, and apply to the Environment Agency for an environmental permit for the south portal surface water discharge if required, into the Thames Estuary and Marshes Ramsar western ditch, in line with Register of Environmental Actions and Commitments (REAC) commitment RDWE033 'Discharge from construction of South Portal' (Code of Construction Practice (ES Appendix 2.2, Application Document 6.3)).</p>	<p>Pre-application advice has been sought from the Environment Agency regarding environmental permitting for the South Portal discharge. It is agreed that any surface water discharge into the Thames Estuary and Marshes Ramsar western ditch would need to be in line with REAC Commitment RDWE033 'Discharge from construction of South Portal' (Code of Construction Practice (ES Appendix 2.2)).</p>	<p>Directive (WFD) Assessment [Application Document APP-478]</p>	
Mitigation	2.1.16 RRE	<p>Ecological mitigation and compensation should be included for the construction phase as well as for the final design. Mitigation and compensation should be in situ prior the impact.</p>	<p>The impacts of habitat loss in the construction and operational phases have been fully assessed in ES Chapter 8: Terrestrial Biodiversity. Habitat creation (for mitigation and compensation) will be delivered by the contractor and therefore forms part of the wider construction programme. REAC Commitment LV029 'Landscape Planting' (Code of Construction Practice (ES Appendix 2.2)) states: <i>'Planting identified on the Environmental Masterplan (Figure 2.4, Application Document 6.2) would be</i></p>	<p>ES Chapter 8: Terrestrial Biodiversity [Application Document APP-146] ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]</p>	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
			<p><i>undertaken at the earliest practicable opportunity.</i></p> <p><i>Where planting is being undertaken to landscape or provide environmental mitigation on land used temporarily for the authorised development, planting for the implementation of environmental mitigation would be undertaken at the earliest practicable planting season after completion of that part of the construction works and in accordance with the LEMP.</i></p> <p><i>Planting on land taken solely for environmental mitigation purposes would be undertaken at the earliest practicable planting season following commencement of authorised development and in accordance with the LEMP.'</i></p>	<p>ES Figure 2.4: Environmental Masterplan [Application Documents APP-159 to APP 168]</p>	
Mitigation	2.1.17	<p>Green bridges should be a sufficient size and design to function for all mammal species that currently utilise the area, as well as providing the necessary corridors for the movement of other species. The design should use contemporary evidence to establish minimum sizes and locations.</p>	<p>Green bridges have been individually designed to provide the greatest benefit at each crossing location for protected mammal species that currently utilise the area. For example, North Road and Muckingford Road mixed-use green bridges have been designed to accommodate terrestrial mammals and other species such as bats.</p>	<p>Design Principles [Application Document APP-516]</p> <p>ES Chapter 8: Terrestrial Biodiversity [Application Document APP-146]</p>	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
			Green bridge designs have been informed by best practice guidance, recent National Highways green bridge designs (for example the A556) and site-specific conditions (for example the presence of protected species and landscape requirements) to provide enhanced ecological connectivity. Full details can be found in the Design Principles and ES Chapter 8: Terrestrial Biodiversity.		
Compensation and enhancement	2.1.18 RRE	The Environment Agency would expect a Project of this scale and importance to achieve net gain in line with the Government's 25 Year Environment Plan.	The Project has an aspiration to achieve Biodiversity Net Gain. Further details are provided in ES Chapter 8: Terrestrial Biodiversity. The Applicant presented its Biodiversity Net Gain results to the Environment Agency on 14 February 2023.	ES Chapter 8: Terrestrial Biodiversity [Application Document APP-146]	Matter Agreed
Marine biodiversity					
Methodology and baseline	2.1.19	The Environment Agency is satisfied with the contents of the PEIR in relation to marine water quality.	Noted.	ES Chapter 9: Marine Biodiversity [Application Document APP-147]	Matter Agreed
Impact	2.1.20 RRE	The Project should not impact the water quality of the Thames.	Any discharges into the River Thames would be required to be permitted by the Environment Agency. Discharges	ES Appendix 14.7: WFD Assessment [Application	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		<p>The Environment Agency agrees with the assessment within the WFD Assessment.</p>	<p>would be compliant with any limits detailed in the conditions of discharge as agreed with the Environment Agency, and as set out in REAC Commitments RDWE023 'Drainage discharge to River Thames', RDWE025 'Operational drainage design', RDWE026 'Tunnel operational drainage design', RDWE028 'Northern tunnel entrance compound drainage discharge design' and GS022 'North Portal' (ES Appendix 2.2: Code of Construction Practice).</p> <p>Required discharges into the River Thames are detailed in ES Appendix 14.7: WFD Assessment, which has been agreed with the Environment Agency.</p>	<p>Document APP-478 ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]</p>	
Compensation and enhancement	2.1.21	<p>The Environment Agency's original position was that they would require compensation if the East Tilbury Jetty were re-purposed to be used for the Project, as the timescales involved would make it into a permanent structure. They also advised that changes to the jetty should not impact the surrounding environment, the water quality of the Thames or impact on existing flood defence infrastructure.</p> <p>The Applicant has subsequently removed the East Tilbury Jetty from the</p>	<p>The Applicant no longer proposes to use the East Tilbury Jetty and has removed it from the Project's Order Limits.</p>	N/A	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		Project's Order Limits, which the Environment Agency welcomes.			
Material assets and waste					
Methodology and baseline	2.1.22	The Environment Agency has requested sight of the Draft Materials Management Plan (MMP). It is agreed that the Draft MMP will be shared with the Environment Agency for review when available.	Draft MMP will not be available prior to submission of the DCO application. The Draft MMP will be written by the contractor and will be shared with the Environment Agency as soon as practicable.	N/A	Matter Agreed
Methodology and baseline	2.1.23	Any site where waste was discarded or disposed of as waste in the past (whether the site now holds a permit or not) remains waste until is it recovered or disposed of. This includes historic landfills and past exempt activities. Excavation of materials from a non-permitted site (historic) is not in itself a waste activity but the subsequent storage, treatment disposal and recovery are.	Matter agreed. The following REAC commitments (ES Appendix 2.2: Code of Construction Practice) relate to waste management activities, and have been agreed with the Environment Agency: <ul style="list-style-type: none"> REAC Commitment MW007 'Excavated materials and soils' REAC Commitment MW010 'Construction site waste management' 	ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]	Matter Agreed
Methodology and baseline	2.1.24	All soils should be tested prior to determining appropriate storage provisions.	Appropriate testing will be undertaken as detailed in the REAC Commitment MW010 'Construction site waste management' (ES Appendix 2.2: Code of Construction Practice).	ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
Impact	2.1.25 RRE	The East Tilbury Landfill is a historic hazardous landfill. The Environment Agency asks that nothing is built on the landfill that could impact its structure, integrity, or increase any pathways for leachate from the landfill. The Environment Agency agrees that REAC Commitment GS020 'East Tilbury access road' is appropriate.	REAC commitment GS020 'East Tilbury access road' (ES Appendix 2.2: Code of Construction Practice) has been agreed with the Environment Agency.	ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]	Matter Agreed
Mitigation	2.1.26	Further to comments provided on the outline Site Waste Management Plan (oSWMP) provided on 02 March 2021, the Environment Agency would like to see the pre-application draft of the document.	The draft OSWMP (ES Appendix 2.2, Annex A) was shared with the Environment Agency on 02 March 2021, and comments were received on 22 March 2021. The Environment Agency's comments have been addressed in the pre-application draft shared with the Environment Agency on 25 August 2022.	ES Appendix 2.2 Annex A: oSWMP [Application Document APP-337]	Matter Agreed
Road drainage and water environment					
WFD					
Methodology and baseline	2.1.27	The Environment Agency agrees with the WFD methodology.	The WFD methodology has been agreed with the Environment Agency.	ES Appendix 14.7: WFD Assessment [Application Document APP-478]	Matter Agreed
Methodology and baseline	2.1.28 RRE	The Environment Agency advised the Applicant that the quantitative status of the South Essex Thurrock Chalk	Due to the timing of this update to WFD status (September 2022), it was agreed at a meeting held on 22	ES Appendix 14.7: WFD Assessment [Application	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		<p>Waterbody was updated from Poor to Good in September 2022.</p> <p>The Applicant provided the Environment Agency with a technical note setting out any potential implications linked to the WFD status change.</p> <p>The Environment Agency agrees with findings of the Applicant's technical note that the change in status of the South Essex Thurrock Chalk Waterbody does not alter any of the conclusions of the WFD assessment.</p>	<p>September 2022 that ES Appendix 14.7: WFD Assessment would not be updated to reflect this status change.</p> <p>The Applicant provided the Environment Agency with a technical note which concludes that the change in status of the South Essex Thurrock Chalk Waterbody does not alter any of the conclusions of the WFD assessment.</p>	<p>Document APP-478</p>	
Impact	2.1.29 RRE	<p>The Environment Agency does not agree with the proposed culverting of watercourses.</p>	<p>Where culverting cannot be avoided, embedded mitigation will be included, the full details of which can be found in the Design Principles and ES Figure 2.4: Environmental Masterplan. Further details of culverting proposals can also be found in ES Figure 14.6: WFD – Groundwater Bodies and Current Status. Culvert lengths have been minimised where practicable, for example the Tilbury Main culvert which has been reduced from 83m to 46m.</p>	<p>Design Principles [Application Document APP-516]</p> <p>ES Figure 2.4: Environmental Masterplan [Application Document APP-159 to APP 168]</p> <p>ES Figure 14.6: WFD – Groundwater Bodies and Current Status [Application Document APP-327]</p>	Matter Not Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
Impact	2.1.30 RRE	<p>The location of the North Portal means that the Lower Thames Crossing will need to cross the Tilbury Main. The Applicant is proposing a 48m culvert. Although the Environment Agency does not agree with culverting in principle, they do accept this is the least damaging option.</p> <p>The Environment Agency is pleased that this has reduced from the original proposal of an 83m culvert. They are also pleased that three existing culverts on the Tilbury Main, one to the east of the road alignment, and two to the west, will be removed.</p> <p>The Environment Agency still opposes the culverting even though the length has been reduced. It is for the applicant to make a case to the Secretary of State for Transport under Regulation 19 of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 that the culverting should be allowed.</p>	<p>A Choosing by Advantage Workshop was undertaken with the Environment Agency to appraise the options for a crossing over the Tilbury Main on 16 December 2019 (HE540039-CJV-GEN-GEN-MIN-DCO-00002). Although the Environment Agency objects to culverting, it was acknowledged that a culvert is the least damaging option in this location owing to the complexity, risks and impacts associated with alternative options. The culvert length has since been reduced from 83m to 46m, with the removal of three further culverts along the Tilbury Main.</p>	ES Appendix 14.7: WFD Assessment [Application Document APP-478]	Matter Agreed
Impact	2.1.31 RRE	<p>The Environment Agency does not agree with the loss of WFD habitat proposed by the Project. The Environment Agency's view is that the loss of WFD habitat cannot be mitigated for.</p>	<p>The culverting of the Tilbury Main, which results in the loss of WFD habitat, is required for the construction and operation of the tunnel approach. The Applicant agrees that the loss of WFD habitat cannot be mitigated for,</p>	ES Appendix 14.7: WFD Assessment [Application Document APP-478]	Matter Not Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
			but the Project design includes 3km of freshwater compensation in the Mardyke Catchment, which represents an overall increase in the provision of freshwater habitat.		
Impact	2.1.32 RRE	Although the Environment Agency does not agree with the loss of WFD habitat, the Environment Agency agrees that the freshwater enhancements will provide an overall increase in freshwater habitat.	The Applicant agrees that there would be an overall increase in the provision of freshwater habitat.	ES Appendix 14.7: WFD Assessment [Application Document APP-478]	Matter Agreed
Impact	2.1.33	WFD assessments should be agreed with the Environment Agency. Notwithstanding SoCG items 2.1.28, 2.1.29 and 2.1.31, the WFD assessment has been agreed with the Environment Agency.	The WFD Assessment (ES Appendix 14.7) has been agreed with the Environment Agency.	ES Appendix 14.7: WFD Assessment [Application Document APP-478]	Matter Agreed
Compensation and enhancement	2.1.34 RRE	The Environment Agency agrees with the relocation of freshwater habitat creation from Coalhouse Point to the Mardyke catchment due to the condition of the sea wall at Coalhouse Point.	Freshwater habitat creation has been moved to the Mardyke catchment. The Coalhouse Point land will be used as Functionally Linked Land (FLL) mitigation and for invertebrate mitigation.	ES Appendix 14.7: WFD Assessment [Application Document APP-478]	Matter Agreed
Compensation and enhancement	2.1.35 RRE	The Environment Agency was approached by the Applicant in July 2022 to review the technical note regarding the proposed water supply for FLL mitigation adjacent to Coalhouse Fort and provided comments on 26 July	The Applicant is considering options for ensuring a water supply to the FLL mitigation adjacent to Coalhouse Fort. The current proposal is to allow ingress of water from the River Thames through a water inlet with self-regulating valve as detailed in REAC	HRA [Application Document APP-487 and APP-488] ES Chapter 8: Terrestrial Biodiversity [Application	Matter Under Discussion

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		<p>2022 (HE540039-LTC-EWE-S07-REP-ENV-00001).</p> <p>A meeting was arranged by the Applicant on 23 August 2022 to discuss the comments provided by the Environment Agency as outlined above. A key concluding point from this meeting was of the two options presented by LTC (1. To install a new regulated tidal exchange structure or 2. Utilise the existing drain through agreement from the Coalhouse Fort moat through agreement with Thurrock Council) the Environment Agency position would be to favour option 2 as it doesn't require disturbance of the existing embankments.</p> <p>If option 1 were to be pursued, engagement should be undertaken with relevant landowners and stakeholders, Statutory Environmental Bodies, local authorities and Statutory Undertakers. Only then would such an option be approved by the Environment Agency in line with 'submission and approval of plans' as required by the Protective Provisions.</p>	<p>Commitment RDWE049 'Water supply and water level control at Coalhouse Point wetland' (Code of Construction Practice (ES Appendix 2.2).</p> <p>In parallel, the potential for a formal agreement is under discussion with Thurrock Council regarding the use of existing drainage infrastructure within the Coalhouse Fort Moat.</p> <p>The Applicant provided initial responses to the Environment Agency's comments at a meeting on 22 August 2022. A further meeting to discuss flood modelling was held on 08 February 2023, and a site visit took place on 20 April 2023. Discussion is ongoing with the Environment Agency on this matter.</p>	<p>Document APP-146 ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]</p>	
Hydrogeology and ground conditions					
Methodology and baseline	2.1.36 RRE	The Environment Agency agrees with the ground investigation methodology.	Methodology agreed.	ES Chapter 14: Road Drainage	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
				and the Water Environment [Application Document APP-152]	
Methodology and baseline	2.1.37 RRE	The Environment Agency agrees with the hydrogeology modelling methodology.	Methodology agreed.	ES Chapter 14: Road Drainage and the Water Environment [Application Document APP-152]	Matter Agreed
Methodology and baseline	2.1.38 RRE	The Environment Agency agrees with the groundwater monitoring regime.	Methodology agreed.	ES Chapter 14: Road Drainage and the Water Environment [Application Document APP-152]	Matter Agreed
Methodology and baseline	2.1.39	The Environment Agency advised that a suitable desk study and Water Features Survey should be completed and agreed with the Environment Agency. This desk study and Water Features Survey has been completed and agreed with the Environment Agency.	Details of the survey methodology and results are provided in the Water Features Survey Factual Report (ES Appendix 14.2). This has been accepted by the Environment Agency.	ES Appendix 14.2: Water Features Survey Factual Report [Application Documents APP-454 and APP-455]	Matter Agreed
Methodology and baseline	2.1.40 RRE	The Environmental Statement should include an assessment of whether any Unexploded Ordnance (UXO) pose	Zetica (UXO specialists) were commissioned to undertake a report detailing likely locations of UXO and	ES Chapter 10: Geology and Soils [Application	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		potential land or groundwater contamination issues.	risk management protocols. This has informed the assessment included in ES Chapter 10: Geology and Soils.	Document APP-148	
Methodology and baseline	2.1.41	Hydrogeological models and risk assessments should be completed and agreed with the Environment Agency. The Environment Agency has reviewed, and is satisfied with, the Hydrogeological Risk Assessment.	A Hydrogeological Risk Assessment (ES Appendix 14.5) has been written and agreed with the Environment Agency, informed by pump test data and groundwater modelling as appropriate.	ES Appendix 14.5: Hydrogeological Risk Assessment [Application Documents APP-458 and APP-459]	Matter Agreed
Methodology and baseline	2.1.42 RRE	Modelling should take account of Source Protection Zones (SPZs).	The ES, the Hydrogeological Risk Assessment (ES Appendix 14.5) and the mitigation requirements have been updated to reflect that part of the Project is located within a SPZ 2 and in close proximity to a SPZ 1.	ES Appendix 14.5: Hydrogeological Risk Assessment [Application Documents APP-458 and APP-459]	Matter Agreed
Methodology and baseline	2.1.43	The Environment Agency highlighted the risk that the results of the hydrogeology investigations might not be received prior to DCO submission and requested that the ground investigation data and reports are shared with the Environment Agency when available. The Environment Agency is now satisfied that all ground investigation is now complete and that the results have been shared with the Environment Agency.	All hydrogeology investigations were completed in 2022, and the results are presented in the Hydrogeological Risk Assessment (ES Appendix 14.5) which has been shared and agreed with the Environment Agency.	ES Appendix 14.5: Hydrogeological Risk Assessment [Application Documents APP-458 and APP-459]	Matter Agreed
Impact	2.1.44	The Project should not affect groundwater quality.	The conclusion of the Hydrogeological Risk Assessment (ES Appendix 14.5),	ES Appendix 14.5: Hydrogeological	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
			is that the Project will not affect groundwater quality.	Risk Assessment [Application Documents APP-458 and APP-459] ES Chapter 10: Geology and Soils [Application Document APP-148]	
Impact	2.1.45 RRE	Cuttings and embankments from the Project must not impact groundwater, such as impeding flow.	Assessments have been undertaken and reported in a Hydrogeological Risk Assessment (ES Appendix 14.5), informed by pump test data and groundwater modelling as appropriate. This has been agreed with the Environment Agency. The findings have informed ES Chapter 14: Road Drainage and the Water Environment.	ES Appendix 14.5: Hydrogeological Risk Assessment [Application Documents APP-458 and APP-459] ES Chapter 14: Road Drainage and the Water Environment [Application Document APP-152]	Matter Agreed
Impact	2.1.46 RRE	The construction and operation of the Lower Thames Crossing must not impact existing abstractions.	Where practicable, the Project would avoid impacts on existing abstractions. Where avoidance is not practicable, the Applicant will consult with the licence holder and licensing authority to provide mitigation in the form of alternative supplies in line with landowner requirements.	ES Appendix 14.7: WFD Assessment [Application Document APP-478]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
Impact	2.1.47 RRE	Following the meeting held on 18 August 2022, the Environment Agency is now satisfied that the REAC item RDWE015 'Replacement of existing reservoir at Low Street', RDWE016 'Protection of landowner irrigation supply infrastructure at North Ockendon' and RDWE038 'Avoiding impacts on groundwater resources at the Thames Chase Forest Site of Importance for Nature Conservation (SINC), Hall Farm moat, paddock, and St Mary Magdalene Churchyard SINC' will ensure continuity of irrigation systems and water supply to the affected landowner, located near the M25/LTC junction.	The Applicant commits to minimising groundwater effects at the A122 Lower Thames Crossing/M25 junction during the construction and operation of the Project through REAC Commitment RDWE038. REAC Commitment RDWE015 commits to reconfigure the water supply system at Low Street, as agreed with the landowner, to maintain continuity of supply during construction and operation of the Project. Continuity of the irrigation system potentially impacted by the road alignment is secured through REAC Commitment RDWE016, which commits to providing a new supply route across the Project road, unless otherwise agreed with the landowner.	ES Appendix 14.5: Hydrogeological Risk Assessment [Application Documents APP-458 and APP-459] ES Appendix 14.7: WFD Assessment [Application Document APP-478]	Matter Agreed
Impact	2.1.48 RRE	The Environment Agency highlighted that the PEIR identified that lowering of groundwater levels during dewatering could increase the risk of saline intrusion potentially impacting on the designated marshes and surface water features. However, following their review of the detailed groundwater studies presented in the Hydrogeological Risk Assessment (ES Appendix 14.5, Application Document 6.3), the Environment Agency now accepts that there is no groundwater connection to the Ramsar,	Sampling of water in the drains and ditches in the Thames Estuary and Marshes Ramsar site has been undertaken as part of the programme of ground investigation works undertaken between 2018-2022. This has confirmed that there is no groundwater connection to the Ramsar. The HRA that there would be no significant change to surface water resulting from any groundwater changes. This is supported by the	HRA [Application Documents APP-487 and APP-488] ES Appendix 14.5: Hydrogeological Risk Assessment [Application Documents APP-458 and APP-459]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		and saline intrusion has been discounted as a potential effect.	preliminary (Stage 2 assessment) hydrogeological and water balance studies (Hydrogeological Risk Assessment (ES Appendix 14.5)).		
Impact	2.1.49 RRE	<p>The Environment Agency highlighted that the potential construction effects and mitigation north of the River Thames should consider the potential for impacts on Mucking Flats and Marshes SSSI, South Essex Chalk and the Linford public water supply. It should also include the potential for mobilisation of contamination due to dewatering near the historical landfill site.</p> <p>Groundwater numerical modelling of the North Portal is complete, and is reported in the Hydrogeological Risk Assessment, which has been agreed with the Environment Agency.</p>	<p>Groundwater numerical modelling of the North Portal has been undertaken to assess any potential impact on the Mucking Flats and Marshes SSSI, South Essex Chalk and Linford public water supply. This is reported in the Hydrogeological Risk Assessment (ES Appendix 14.5), and no significant effects have been identified.</p> <p>The Hydrogeological Risk Assessment has been agreed with the Environment Agency.</p>	ES Appendix 14.5: Hydrogeological Risk Assessment [Application Documents APP-458 and APP-459]	Matter Agreed
Impact	2.1.50	North Road has been lowered by two metres, resulting in a reported potential increase of groundwater seepage into the excavations. Risks to controlled waters should be assessed in terms of quality and quantity. Dewatering requirements and discharge should be quantified and consented/permitted.	Impacts to controlled waters are assessed in Annex L: A122 Lower Thames Crossing/M25 Junction Groundwater Impact Assessment Numerical Model – Technical Note (Hydrogeological Risk Assessment (ES Appendix 14.5), which was issued to and reviewed by the Environment Agency. Further modelling work has been undertaken to quantify the	ES Appendix 14.5: Hydrogeological Risk Assessment [Application Documents APP-458 and APP-459] Consents and Agreements Position Statement [Application	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
			<p>impacts on controlled waters and inform mitigation requirements.</p> <p>Risks to controlled water, either in terms of quantity or quality, as well as mitigation measures and good construction practice, are included in ES Chapter 14: Road Drainage and the Water Environment.</p> <p>Prior to the excavation in this area, the Contractor(s) would need to apply to the Environment Agency to obtain the necessary dewatering/discharge permits as acknowledged in the Consents and Agreements Position Statement.</p>	<p>Document APP-058</p> <p>ES Chapter 14: Road Drainage and the Water Environment [Application Document APP-152]</p> <p>ES Chapter 10: Geology and Soils [Application Document APP-148]</p>	
Mitigation	2.1.51 RRE	<p>The Environment Agency advised that as ground investigations were undertaken and assessment of any discovered contamination was made, the Environment Agency would require discussions regarding remediation as part of ongoing DCO assessments.</p> <p>The Environment Agency is now satisfied that the ground investigation works for the DCO are complete.</p>	<p>The ground investigation for the DCO application is complete and the results have been shared with the Environment Agency. The results are detailed in ES Chapter 10: Geology and Soils and supporting appendices.</p>	<p>ES Chapter 10: Geology and Soils [Application Document APP-148]</p>	Matter Agreed
Mitigation	2.1.52 RRE	<p>The Environment Agency has requested the monitoring of selected boreholes at the South Portal throughout the construction phase.</p>	<p>The Applicant has committed to monitoring selected boreholes at the South Portal throughout construction in REAC Commitment HR008 'Groundwater Surveillance' (Code of</p>	<p>ES Appendix 2.2: Code of Construction Practice [Application</p>	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
			Construction Practice (ES Appendix 2.2)).	Document APP-336	
Mitigation	2.1.53 RRE	<p>The design of all drainage systems should be submitted to the Environment Agency for review in relation to pollution prevention. Drainage designs should include sufficient treatment trains prior to discharge to surface water or infiltration to ground.</p> <p>The Environment Agency has reviewed and approved Part 7 of the FRA: surface water drainage strategy for the preliminary design (ES Appendix 14.6, Application Document 6.3). They have also reviewed and approved the Hydrogeological Risk Assessment (ES Appendix 14.5, Application Document 6.3), which assesses the efficiency of these measures.</p>	<p>Part 7 of the FRA (surface water drainage strategy for the preliminary design) sets out the outline drainage design for surface water.</p> <p>As described in Part 7 of the FRA, the drainage design treatment measures and the efficiency of these measures have been assessed in the Hydrogeological Risk Assessment (ES Appendix 14.5), the Operational Surface Water Drainage Pollution Risk Assessment (ES Appendix 14.3) and summarised in ES Chapter 14: Road Drainage and the Water Environment.</p>	<p>ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]</p> <p>ES Appendix 14.5: Hydrogeological Risk Assessment [Application Documents APP-458 and APP-459]</p> <p>ES Appendix 14.3: Operational Surface Water Drainage Pollution Risk Assessment [Application Document APP-456]</p> <p>ES Chapter 14: Road Drainage and the Water Environment [Application Document APP-152]</p>	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
FRA					
Methodology and baseline	2.1.54 RRE	An FRA should be included with the DCO application and the Environment Agency should be consulted on this (including the Tilbury and Mardyke models) and should sign this off. The Environment Agency is satisfied with the Mardyke and Tilbury Main models, and the FRA.	The Environment Agency have confirmed that they are satisfied with all parts of the FRA (ES Appendix 14.6).	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed
Methodology and baseline	2.1.55	An FRA should be prepared in line with the requirements of the National Policy Statement for National Networks (NPSNN) and the National Planning Policy Framework (NPPF) Flood Risk and Coastal Change Planning Practice Guidance. The Environment Agency agrees with the Applicant's precautionary approach where guidance differs.	The FRA has been developed in line with the requirements of the NPSNN, NPPF and National Highways' Design Manual for Roads and Bridges (DMRB). There are slight inconsistencies across these three documents; where inconsistencies have been observed, the Applicant has adopted the provisions of the most conservative. This approach has been agreed with the Environment Agency.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed
Methodology and baseline	2.1.56 RRE	The Environment Agency advised that flood modelling was needed to understand the risk of flooding to the Project and the changes that the design will have on flooding. They requested to review the fluvial models and sign these off.	The Applicant has consulted the Environment Agency on the flood models, and they have accepted these.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		The Environment Agency has now reviewed, and is satisfied with, the flood models for the Mardyke and Tilbury Main.			
Methodology and baseline	2.1.57	Bowater's Sluice should be included within the fluvial model.	Bowater's Sluice has been included in the fluvial model.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed
Methodology and baseline	2.1.58	The residual design life of Bowater's Sluice is less than the design life of the Lower Thames Crossing. If it is required for flood management, its condition should be improved by the Applicant.	The fluvial model assumes that Bowater's Sluice is 100% blocked. The Project would remain operational if Bowater's Sluice failed, therefore upgrading the asset is outside of the scope of the Project. The Project will not increase surface water flood volumes and so will not increase flood risk elsewhere if Bowater's Sluice outfall fails.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed
Methodology and baseline	2.1.59 RRE	The Environment Agency's initial view was the monitoring of Bowater's Sluice should be undertaken. However, they now agree with the findings of the Applicant's technical note regarding defence monitoring at Bowater's Sluice (HE540039-LTC-GEN-GEN-TNT-TPI-00001) and therefore agree that monitoring does not need to be undertaken.	The Applicant has undertaken a study which concluded that defence monitoring of Bowater's Sluice is not required.	Bowater Sluice and East Tilbury Tidal Wall Monitoring Assessment (HE540039-LTC-GEN-GEN-TNT-TPI-00001)	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
Methodology and baseline	2.1.60	Star Dam should be included within the fluvial model.	Star Dam has been included in the fluvial model.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed
Methodology and baseline	2.1.61 RRE	The Environment Agency originally advised that Star Dam was in poor condition and could cause flooding to the North Portal. Their view was that if it failed, it would prevent water from the landward side from draining out into the River Thames, which will back up to the portal entrance. However, the Environment Agency now agrees with, and has signed off, the Applicant's fluvial model which indicates that a blockage of Star Dam would not cause flooding of the tunnel portal.	Fluvial modelling indicates a blockage of Star Dam would not cause flooding of the tunnel portal, since, for fluvial events up to a 1,000 year return period in 2129, post-development (with the specified floodplain compensation mitigation measures) flood extents do not reach the tunnel portal and so the blockage of Star Dam would not affect flood extents or depths.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed
Methodology and baseline	2.1.62 RRE	The Environment Agency agreed with the approach taken to climate change in the FRA, as detailed in the technical note issued to the Environment Agency on 30 April 2020 (HE540039-CJV- EFR-TNT-ENV-00011). However, models have subsequently been re-run to reflect the latest peak river flow allowances released in 2021 and have been agreed with the Environment Agency.	Models have been re-run to reflect the latest peak river flow allowances released in 2021 and have been agreed with the Environment Agency.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
Methodology and baseline	2.1.63	The Environment Agency informed the Applicant on 04 May 2022 that be new peak rainfall allowances would be published on 09 May 2022. The Environment Agency has informed the Applicant that the upper end allowance is unlikely to change significantly from what is published and, in most locations, it will be 40–45%. Where work is within 5% of the updated allowance, the Applicant will not be required to re-run the assessment.	The Environment Agency has confirmed that the updated climate change allowance is within 5% and therefore the fluvial model does not need to be re-run.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed
Methodology and baseline	2.1.64	The Environment Agency advises that the Lead Local Flood Authority (LLFA) should be consulted on the drainage designs and that comments should be shared with the Environment Agency.	Drainage designs have been shared with the LLFA, and comments have been shared with the Environment Agency.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed
Impacts	2.1.65	There should be no net loss in floodplain storage resulting from the Project. The Lower Thames Crossing must also not impede flood flow and/or reduce storage capacity thereby increasing the risk of flooding elsewhere. Any loss of storage must be compensated, and compensation should be agreed with the Environment Agency.	The FRA (ES Appendix 14.6) demonstrates compliance with these requirements. Fluvial floodplain compensation would be provided on a hydraulically linked level-for-level basis in the Mardyke catchment. Providing level-for-level compensation is not possible in the Tilbury Main catchment due to the low-lying and flat floodplain. Instead, compensation would be largely provided to intercept upstream flows, and has been assessed through hydraulic modelling.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
Impacts	2.1.66 RRE	<p>The Environment Agency advised that the design of Project should not impact on the existing flood defence assets. A monitoring program should be agreed with the Environment Agency and should include baseline, construction, and operational surveys to ensure there is no impact to any assets.</p> <p>The Environment Agency has now confirmed that they are satisfied with REAC Commitment RDWE007 'Protection of flood defences from ground movement'.</p>	<p>The Applicant has committed to monitor flood defences to establish a pre-construction baseline and for at least two years after completion of works, in line with REAC Commitment RDWE007 'Protection of flood defences from ground movement' (Code of Construction Practice (ES Appendix 2.2)).</p>	<p>ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]</p>	Matter Agreed
Impacts	2.1.67	<p>The Environment Agency requires access for maintenance and operation of all flood risk assets, and this should be included in the final design of the Project. Access should be maintained throughout the construction and operational phases. Where changes are made by the Applicant, maintenance should be carried out in the future by agreed parties.</p>	<p>The Applicant's proposals would not compromise the Environment Agency's ability to maintain and operate their assets. For example, where the Project crosses the Mardyke, Orsett Fen Sewer and Golden Bridge Sewer, to protect riverbanks and facilitate Environment Agency access to these watercourses for future maintenance, a bankside access track would be incorporated into the design of the crossings, the width of which would be subject to agreement with the Environment Agency as detailed in Design Principle S12.05 'Height of the Mardyke and Orsett Fen Viaducts'.</p>	<p>Draft Development Consent Order [Additional Submission AS-038] Design Principles [Application Document APP-516]</p>	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
Impacts	2.1.68 RRE	<p>In the future, the flood defences along the River Thames may be raised on their current alignment. If this is the case, Environment Agency modelling indicates that the likely the design crest level would be 8m Above Ordnance Datum (AOD) by 2070. The possible raising options include:</p> <ul style="list-style-type: none"> • Earth embankment • Earth embankment with wall upstand • Earth embankment with sheet pile • Earth embankment with controlled modulus <p>The Applicant should demonstrate that these options could be implemented without impacting on the tunnel.</p> <p>The Environment Agency is now content with the text included in the Contractor's specification.</p>	<p>The following text, as agreed with the Environment Agency, has been included in the contract scope:</p> <p><i>“The tunnel lining shall be designed to accommodate the load of a future increase in river flood defences height to 8.0m AOD. Methods of raising may include:</i></p> <ul style="list-style-type: none"> • <i>Earth embankment</i> • <i>Earth embankment with wall upstand</i> • <i>Earth embankment with sheet pile</i> • <i>Earth embankment with controlled modulus”</i> 	N/A	Matter Agreed
Impacts	2.1.69 RRE	<p>Flood Warning and Evacuation Plans should be produced for compounds located within Flood Zone 3.</p>	<p>The production of an evacuation plan and flood warning system would form part of the safety components of any site compound.</p> <p>The Applicant has also agreed the following REAC commitments with the</p>	<p>ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]</p>	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
			<p>Environment Agency (ES Appendix 2.2):</p> <ul style="list-style-type: none"> REAC Commitment RDWE022 'A226 Gravesend Road, Milton, northern tunnel entrance, Station Road and Mardyke compounds. Construction flood risk'. REAC Commitment RDWE001 'Construction flood risk'. 		
Impacts	2.1.70 RRE	<p>Any utility crossings such as temporary crossings, or walker, cyclist and horse rider (WCH) routes requiring a permit should have modelling to support the application to show no increases in flood risk.</p> <p>The Environment Agency reserves the right to require further modelling or detail about utility crossings once the exact locations are known.</p>	<p>Highway crossings (including WCH crossings) are detailed in Part 10 of the FRA (ES Appendix 14.6). Specific crossings have not been modelled, and this is not currently within the scope of the modelling. Generally, changes in flood levels are within $\pm 10\text{mm}$, which is classified by the Applicant as 'negligible'.</p> <p>REAC Commitment RDWE008 'Protection of watercourses during utility works' (Code of Construction Practice (ES Appendix 2.2)) commits to the use of trenchless techniques for crossing watercourses.</p>	<p>ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]</p> <p>ES Appendix 2.2: Code of Construction Practice [Application Document APP-336]</p>	Matter Agreed
Compensation and enhancement	2.1.71	<p>The Environment Agency originally requested that any flood structure should be designed at a height to protect from future water level rise, or to enable retrofitting in the future. The Applicant's commitment not to compromise the</p>	<p>Raising of Environment Agency flood defences is outside of the scope of this Project. However, the proposals should not compromise the Environment Agency's ability to</p>	<p>ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]</p>	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
		Environment Agency's ability to maintain and raise assets in the future is agreed and has been confirmed by the Environment Agency's acceptance of the FRA and fluvial models.	maintain and raise these defences in the future.		
Compensation and enhancement	2.1.72 RRE	The Environment Agency requested that flood compensation in the Mardyke should be agreed with the Environment Agency. Flood compensation has now been agreed with the Environment Agency.	The Mardyke flood compensation has been agreed with the Environment Agency.	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed
Cumulative effects					
Methodology and baseline	2.1.73 RRE	The proposals and future options in the Thames Estuary 2100 (TE2100) Plan need to be taken account of by the Applicant, including the provision of a future Thames Barrier. The Environment Agency agrees with the approach set out in the Future Thames Barrier breach modelling technical note (HE540039-CJV-EFR-GEN-TNT-ENV-00101).	The TE2100 Plan and its context in relation to the Project is included in Part 2 of the FRA (ES Appendix 14.6). A review of the potential impact that the Project may have on the TE2100 Plan is included in Part 6 the FRA (ES Appendix 14.6). The location options for the new Thames Barrier proposed in the TE2100 Plan are located outside the Order Limits and so have not been considered in the ES. A technical note was issued to the Environment Agency on the Future Thames Barrier breach modelling (HE540039-CJV-EFR-GEN-TNT-ENV-00101), and the Environment Agency	ES Appendix 14.6: FRA [Application Documents APP-460 to APP-477]	Matter Agreed

Topic	Item No.	Environment Agency Comment	National Highways' Response	Application Document Reference	Status
			agreed with the approach set out in it. This technical note is included as an appendix to the FRA (ES Appendix 14.6).		

Appendix A Engagement Activity

Table A.1 Engagement activities between the Applicant and the Environment Agency since the DCO Application was submitted on the 31 October 2022

Date	Overview of Engagement Activities
02.11.2022	Fortnightly catch-up meeting to discuss the DCO application and to highlight that the DCO Application Documents were available for the Environment Agency to access on SharePoint.
16.11.2022	DCO walkthrough presentation to provide stakeholders a summary of where to find relevant DCO Application Documents.
16.11.2022	Fortnightly catch-up meeting to discuss SoCG items and plan upcoming engagement.
22.11.2022	Meeting to discuss the Esso Petrol Station site
25.11.2022	Stakeholder biodiversity and ecology briefing, including impact, mitigation and compensation proposals and the associated biodiversity value
30.11.2022	Fortnightly catch-up meeting to discuss the SoCG and to provide an update on actions.
14.12.2022	Fortnightly catch-up meeting to discuss Relevant Representations, Protective Provisions and the Service Level Agreement.
11.01.2023	Fortnightly catch-up meeting to discuss likely timescales for DCO Examination, the Service Level Agreement, and to provide an update on the Coalhouse Point mitigation land.
17.01.2023	Area Manager Meeting to discuss the likely DCO programme and PADS.
25.01.2023	Fortnightly catch-up meeting to discuss ongoing actions, and to plan the future schedule of engagement.
01.02.2023	Environmental Permitting Strategy Workshop 7
07.02.2023	Area Manager Meeting to discuss Relevant Representations, PADS, and progression of matters under discussion in the SoCG.
07.02.2023	Meeting to discuss Cobham Petrol Station site.
08.02.2023	Meeting to discuss the proposed Coalhouse Point flood modelling simulations.
08.02.2023	Fortnightly catch-up meeting to discuss the SoCG and to provide an update on actions.
14.02.2023	Meeting to discuss Biodiversity Net Gain
22.02.2023	Fortnightly catch-up meeting to discuss SoCG matters and PADS.
07.03.2023	Area Manager Meeting to discuss the Environment Agency's Relevant Representations response, and to provide an update on the permitting workstream

Date	Overview of Engagement Activities
08.03.2023	Fortnightly catch-up meeting to present the findings of National Highways' assessment of the updated WFD status of the South Essex Thurrock Chalk Groundwater Body.
21.03.2023	Environmental Permitting Strategy Workshop 8
22.03.2023	Fortnightly catch-up meeting to discuss the SoCG review process.
05.04.2023	Fortnightly catch-up meeting to discuss the Service Level Agreement, comments on the proposed modelling of Coalhouse Point and Balfour Beatty's FRAP.
17.04.2023	Stakeholder Landscape and Ecology Working Group (option A)
19.04.2023	Fortnightly catch-up meeting to discuss the SoCG and to provide an update on actions.
20.04.2023	Site visit to Coalhouse Point to discuss the proposed ecological mitigation site.
02.05.2023	Area Manager Meeting to discuss the Rule 6 Letter, ways of working during Examination and to provide an update on the permitting workstream
02.05.2023	Stakeholder Landscape and Ecology Working Group (option B)
03.05.2023	Fortnightly catch-up meeting to discuss the SoCG and to provide an update on actions.
09.05.2023	Briefing on the assessment of groundwater and contamination detailed in the ES.
17.05.2023	Fortnightly catch-up meeting to discuss the Service Level Agreement, the public consultation, protective provisions and Coalhouse Point modelling.
17.05.2023	Stakeholder briefing on the public consultation material.
25.05.2023	Environmental Permitting Strategy Workshop 9

Appendix B Glossary

Term	Abbreviation	Explanation
Above Ordnance Datum	AOD	Vertical datum used by the Ordnance Survey as the basis for deriving altitudes on maps.
Design Manual for Roads and Bridges	DMRB	A comprehensive manual which contains requirements, advice and other published documents relating to works on motorway and all-purpose trunk roads for which one of the Overseeing Organisations (National Highways, Transport Scotland, the Welsh Government or the Department for Regional Development (Northern Ireland)) is the highway authority. For the A122 Lower Thames Crossing, the Overseeing Organisation is National Highways.
Development Consent Order	DCO	Means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects (NSIP) under the Planning Act 2008.
Environmental Permitting (England and Wales) Regulations 2016 (as amended)	EPR	These Regulations provide a consolidated system of environmental permitting in England and Wales.
Environmental Statement	ES	A document produced to support an application for development consent that is subject to Environmental Impact Assessment (EIA), which sets out the likely impacts on the environment arising from the proposed development.
Flood Risk Activity Permit	FRAP	Flood Risk Activity Permit
Flood Risk Assessment	FRA	An assessment of the risk of flooding from all flooding mechanisms, the identification of flood mitigation measures, and identification of actions to be taken before and during a flood.
Functionally Linked Land	FLL	Functionally linked land is habitat used by the birds outside the European site boundary.
Lead Local Flood Authority	LLFA	LLFAs are county councils and unitary authorities. They lead in managing local flood risks (i.e., risks of flooding from surface water, ground water and ordinary (smaller) watercourses). This includes ensuring co-operation between the Risk Management Authorities in their area. The LLFA for the M25 area is Essex County Council who is acting on behalf of Thurrock.
Materials Management Plan	MMP	Materials Management Plan
National Planning Policy Framework	NPPF	The National Planning Policy Framework was published in March 2012 by the UK's Department of Communities and Local Government, consolidating over two dozen previously issued documents called Planning Policy

Term	Abbreviation	Explanation
		Statements (PPS) and Planning Practice Guidance Notes (PPG) for use in England. The NPPF was updated in February 2019 and again in July 2021 by the Ministry of Housing, Communities and Local Government.
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.
Outline Site Waste Management Plan	oSUMP	A document which sets out how resources will be managed, and waste controlled during the Project. Plans usually involve recording the amount of waste that will be produced and details the proposed methods of waste disposal.
Preliminary Environmental Impact Report	PEIR	An early output of the EIA process, and part of the DCO application process.
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).
Site of Importance for Nature Conservation	SINC	Locally designated nature site protected through the planning system
Site of Special Scientific Interest	SSSI	A conservation designation denoting an area of particular ecological or geological importance.
Source Protection Zone	SPZ	EA-defined groundwater sources (2000) such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area.
Thames Estuary 2100	TE2100	An Environment Agency project (formed November 2012) to develop a comprehensive action plan to manage flood risk for the Tidal Thames from Teddington in West London, through to Sheerness and Shoeburyness in Kent and Essex.
Unexploded Ordnance	UXO	Explosive ammunition that did not explode when they were deployed and still pose a risk of detonation. Sometimes referred to as UXBs.
Walkers, cyclists and horse riders	WCH	Walkers, cyclists and horse riders
Water Framework Directive	WFD	Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework

Term	Abbreviation	Explanation
		for Community action in the field of water policy. The Directive establishes a framework for the protection of inland surface waters, estuaries, coastal waters and groundwater. The framework for delivering the WFD is through river basin management planning. The UK has been split into several river basin districts. Each river basin district has been characterised into smaller management units known as water bodies. The surface water bodies may be rivers, lakes, estuary or coastal.

Appendix C Documents considered within this Statement of Common Ground

- C.1.1 A summary of the documents which have been considered in the development of this SoCG outside of the DCO application documents are provided below, such as emails, meeting notes, etc and are included as annexes to this Appendix:
- a. Annex C.1: Environment Agency Statutory Consultation Response
 - b. Annex C.2: Environment Agency Supplementary Consultation Response
 - c. Annex C.3: Environment Agency Design Refinement Consultation Response
 - d. Annex C.4: Environment Agency Community Impact Consultation Response
 - e. Annex C.5: Environment Agency Local Refinement Consultation Response
 - f. Annex C.6: Tilbury Main Diversion Options, Choosing By Advantage Light (HE540039-CJV-GEN-GEN-MIN-DCO-00002)
 - g. Annex C.7: WFD Implications of Culverting Tilbury Main (HE540039-CJV-GEN-GEN-MIN-STK-00801)
 - h. Annex C.8: Coalhouse Point Mitigation Water Supply Structure (HE540039-LTC-EWE-S07-REP-ENV-00001)
 - i. Annex C.9: Flood Risk Assessment – Climate Change (HE540039-CJV-EFR-TNT-ENV-00011)
 - j. Annex C.10: Flood Risk Assessment – Future Thames Barrier Breach Modelling (HE540039-CJV-EFR-GEN-TNT-ENV-00101)
 - k. Annex C.11: Bowater Sluice and East Tilbury Tidal Wall Monitoring Assessment (HE540039-LTC-GEN-GEN-TNT-TPI-00001)
 - l. Annex C.12: Agreed Statements

Annex C.1 Environment Agency Statutory Consultation Response

Tim Jones
Lower Thames Crossing
Beaufort House
15 St. Botolph Street
London
EC3A 7DT

Our ref: KT/2018/124865/01-L01
Your ref: Lower Thames Crossing
Date: 19 December 2018

Dear Tim

Section 42 Planning Act 2008 consultation on Lower Thames Crossing – Preliminary Environmental Report (PEIR)

Lower Thames Crossing

Thank you for consulting us on the current Lower Thames Crossing proposals and the Preliminary Environmental Information Report (PEIR).

Based on the information provided the PEIR does not provide all the information that we expected. If an application for development was made using it, we would object to the application due to insufficient information, details of which are below.

We welcome the fact that you have set up regular meetings with us to discuss the requirements of your development in relation to our remit. We also recognise that there have been changes to the scheme designs and locations in response to the environmental information, constraints, and our advice.

Our concerns are as follows:

- **Baseline data and survey information**

The PEIR does not contain the environmental survey and baseline data for us to fully assess the impacts of the scheme. This information should be used to inform the design of the scheme.

We would expect that as more information comes available the scheme design will change to ensure that the environment is protected and enhanced, meeting the needs of people and wildlife. Without this information and design changes we would maintain our objection at the submission stage.

- **Environmental protection and enhancement**

We would expect a scheme of this scale and importance to be providing more environmental improvement and benefit than is shown in the current designs. The 25 Year Environment Plan has a commitment to embed net environmental gain into development, including infrastructure.

Due to the scale of the scheme and length of time needed for construction we would expect a greater environmental legacy than that proposed. This development has the opportunity to maximize benefits for people, wildlife and the economy. These opportunities should not be missed.

- **Safeguarding for the future**

We expect the whole life span of the development to be designed in line with the Thames Estuary 2100 plan taking account of the UKCP18 climate change levels. This includes having a robust design that can be retro fitted in line with future information and flood protection changes.

We have provided specific comment on the document in the pages that follow. Please note, we may need to add to or amend the matters set out in this response as further information is provided.

We look forward to continuing to work with you in progressing the points above as the scheme develops including the opportunities to maximise the environmental benefits.

Yours sincerely

Joanna Hodgson
Sustainable Places Technical Specialist

Direct dial 0208 4746716

Direct e-mail KSLplanning@environment-agency.gov.uk

Further comments

These comments relate to flood risk, groundwater and contaminated land, waste and biodiversity specifically and have been split into sections accordingly.

Flood Risk

General comments

The data regarding tidal defences benefitting the project within Essex is not complete and misses the Environment Agency maintained tidal defences at both Star Dam (inland of Coalhouse Fort) and Bowaters Wall / Sluice. Both these locations are 0.1% Annual Exceedance Probability (AEP) defences.

The Bowaters Sluice outfall which provides drainage to the West Tilbury Main Catchment has suffered from significant subsidence and is no longer functioning correctly. The residual life of the structure is significantly less than the design life of the LTC and will require replacement to provide drainage to the scheme.

We are pleased that the South Portal is located within Flood Zone 1. If there are any surface works within the “temporary use of land required” (LTC #13b Map book 2) and within Flood Zone 2 and 3 we would expect these to be detailed within the Flood Risk Assessment and the flood risk and potential impacts appropriately assessed and mitigated. If any works are proposed near to the flood defences we would want to ensure our ability to access the defences to undertake maintenance is not affected.

Flood Risk Activity Permits

We would advise you that a Flood Risk Activity Permit may be required under the Environmental Permitting (England and Wales) Regulations 2016 if you want to do work

- Within 8m of the bank of a main river, or 16m if it is a tidal main river
- Within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river

Further guidance on applying for Flood Risk Activity Permits can be found on the following link <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

In particular the potential drainage outfall mentioned on LTC#13a Map book 1, Sheet 7, General Arrangement Plan and the potential temporary jetty are likely to require a Flood Risk Activity Permit.

Please also be aware that any new jetty, or modification to an existing jetty, will require consideration from us in terms of the impact this may have on existing flood defence infrastructure and the impact upon the Thames Estuary.

Document Specific Comments

LTC #1 - PEIR Volume 1

2.13 Flood Risk Mapping

Make reference to a Flood Zone Map and include this map

2.13.2

refer to the Tilbury Main River not just the Tilbury marshes

2.13.3

separate the areas – Refer to Tilbury Marshes defences and sluices (Star Dam and Bowater Sluice) and then refer to Orsett Fen Sewer and how it is defended.

2.13.4

These comments need to be expanded upon. It must be determined that the project will not result in a net loss in floodplain storage. Furthermore it must show that the proposed development will not impede flood flow and/or reduce flood storage capacity thereby increasing the risk of flooding elsewhere.

Where sections of the Project fall within tidal Flood Zone 3 the picture of flood risk will need to be painted to show the changes to risk. How does the flood hazard (depth, rate of onset, velocity) change as a result of what is being proposed. Areas of compensation will be required if there is significant change in hazard category.

2.13.5

It will need to be shown that any increase in built footprint within the 1% (1 in 100) annual probability flood extent, including allowances for climate change, can be directly compensated for on a volume-for-volume and level-for-level basis to prevent a loss of floodplain storage. If there are no available areas for compensation above the design flood level and compensation will not be possible then a calculation of the offsite flood risk impacts will need to be undertaken.

2.13.8

The following should be added to the points in this section:

- h. connectivity of the flood cells and requirements for culverts through the embankments
- i. the volume available for breached flows to accumulate behind the sea defences
- j. how the project will impact the rate of inundation

2.18 Construction Work

2.18.1

The following should be added to the points in this section:

- g. Flood defence and sluice improvement work

Compound Locations (page 34)

2.18.15

The following should be added to the points in this section:

- h. Flood Warning and Evacuation Plan for those locations within Flood Zone 3.

2.20 Rest and Service Area

This is in a Flood Zone and will need to be constructed to ensure it is not at risk from flooding or increase the risk of flooding elsewhere

Third party asset protection (page 38)

Need to mention that there will be monitoring of existing flood defences assets during construction phase to ensure there is no detrimental impact to the defences and that monitoring will be continued post construction phase.

11.5.3 Further baseline information and surveys required

We would welcome the results of any geotechnical/pre-condition surveys undertaken that relate to the flood defences.

Chapter 15 - Road Drainage and Water Environment

Table 15.2

Mentions the UKCP09. Needs to be updated to the UKCP18 as they have now been released.

15.4.46

Fluvial and tidal flood risk zones and flood defence assets are illustrated in Figure 15.3 in Volume 3.

15.4.48 and 15.4.60 (Flood risk and flood defences)

Please be aware that the proposed drainage outfall mentioned on LTC#13a Map book 1, Sheet 7, General Arrangement Plan would be within the Policy P4 area - Gravesend unit. Therefore, any works should take account of the need to maintain and raise these defences in the future. We would welcome a conversation to discuss the impact on the tidal defences in more detail.

Policy P4 area - Gravesend unit: Maintain the current standard of protection which will require raising to take account of climate change.

Policy P3 area – North Kent Marshes unit: Maintain the current height of the defences excepting that the standard of protection will reduce with climate change.

Flood risk and Defences (page 509)

15.5.2

We would like the following (*shown in italic*) to be added into the existing text:

An FRA will be prepared in line with the requirements of the NPSNN and the National Planning Policy Framework Flood Risk and Coastal Change Planning Practice Guidance (Ministry of Housing, Communities and Local Government,

Environment Agency

Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH

Customer services line: 03708 506 506

Email: enquiries@environment-agency.gov.uk

www.gov.uk/environment-agency

2014). The assessment is currently being scoped in consultation with the Environment Agency and will be informed by hydrological and hydraulic modelling of key river systems including the Tilbury Main, the Mardyke and its tributaries (the Orsett Fen Sewer and the Golden Bridge Sewer). In addition, breach of the Thames' defences will be modelled and the subsequent flood risk to the Project assessed. A topographical survey will be undertaken, and the data used to develop models of these watercourses and their floodplains. The findings of the modelling studies will be reported in an FRA that defines baseline flood risk and informs the design of any flood risk management measures that may be necessary. These findings will also inform the Road Drainage and Water Environment Chapter of the Environmental Statement.

The highlighted sentence should also say:

The findings of the modelling studies will be reported in an FRA that defines baseline flood risk and also the as built flood risk which informs the design of any flood risk management measures and mitigation that may be necessary.

Table 15.10

We would expect to understand what monitoring of the tidal defences you will undertake to ensure there is no detrimental impact to the defences (and any associated infrastructure) during and after works have been completed. The applicant would need to agree a programme of monitoring with the Environment Agency and the actions required if any damage to the defences occurs.

It also mentions potential scour protection for the tunnel would require works to the bed of the river. Any works should be agreed with the Environment Agency.

16.2.2

We welcome the project response in table 16.3 that the UKCP18 data will be applied in the ES to cover the estimated lifetime of the project. Please contact the Environment Agency to obtain any potential changes in modelled flood information, approach or impact on flood risk management in the project area as a result of a change in UKCP data.

Table 16.11

Must also include 0.1% (1 in 1000) cc

LTC #3 - Design consultations and operations

4.8.4

This watercourse is called the West Tilbury Main. The main rivers crossed close to the northern portal are known as 'West Tilbury Main', 'West Tilbury West Branch Sewer' and 'West Tilbury North Branch Sewer'. We welcome the comments in paragraph 4.8.5 which confirms that these rivers shall be maintained and comply with the requirements of the Environment Agency and other relevant authorities.

Environment Agency

Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH

Customer services line: 03708 506 506

Email: enquiries@environment-agency.gov.uk

www.gov.uk/environment-agency

15.5.4

We note the preferred option for crossing the 3 main rivers in this area. These will require a bespoke permit under the Environmental Permitting Regulations.

18.3.4

We note a staged approach is proposed for the provision of flood storage. Details of the staged approach will be supported by detailed flood risk modelling, which will provide sufficient evidence to demonstrate that the works will not result in any increases to flood risk, both upon completion of the project and during the construction phases.

LTC #4a - PEIR Figures (3b)

Figure 11.10- Slope Stability Sheet 2 of 3

Please provide confirmation of where the data has been sourced to inform this map e.g. was it a desktop study or a detailed investigation.

Figure 11.11- Shrink Swell- Running Sands, Sheet 2 of 3

Please provide confirmation of where the data has been sourced to inform this map e.g. was it a desktop study or a detailed investigation.

Groundwater and contaminated land

General comments

The PIER report identifies lowering of groundwater levels during dewatering could increase the risk of saline intrusion potentially impacting on the designated marshes and surface water features.

In order for us to fully assess the likely impacts that may arise from dewatering. Further ecological and water sampling (conductivity) of the drains and ditches in and around the Ramsar need to be undertaken to understand how this sensitive environment works.

Any lowering of groundwater levels must ensure springs and seepages continue to support flow and levels in surface water drains and groundwater-fed ponds.

As of 1 January 2018 previously exempt water abstractors, such as trickle irrigation, dewatering, navigation and others are now a regulated activity to meet the requirements of the Water Framework Directive. Please ensure these new licensed activities, listed under the Water Act 2003, are included in future Water Features Survey.

We look forward to receiving the Hydrogeological Risk Assessment report and further proposal details on dewatering in due course.

The scope of the Environmental Statement and the outline PEIR is accepted as being in line with what is expected for such a significant project for the south bank of the project. In relation to land quality issues; contamination and landfill especially, further ground investigations are crucial to formalising design for the tunnel, roadway and drainage in addition to addressing historic contamination appropriately. Any remediation in the context of the National Planning Policy Framework (NPPF) requirements for sustainable development and environmental betterment and protection must be agreed in detail with relevant regulators prior to any works.

LTC#1 - PEIR Volume 1

Section 2 - Project Description

S.2.7.2

Detailed impact assessments concerning changes to flow and supported surface water body functioning will be required for all cuttings and embankments into the shallow and deep aquifers.

S.2.7.3

Full assessments of the impact of below ground structures on the chalk aquifer with regards to flow and the water quality will be required for construction and operation with particular focus needed on the potential for saline intrusion and contamination mobilisation impacts on dewatering.

S.2.9.1b

Details of the methods for the proposed crossings at Tilbury Main and Mar Dyke are required.

S.2.9.3

The design for all drainage systems will need to be submitted for review and should include sufficient treatment trains prior to discharge to surface water or infiltration to ground; details of operational maintenance programs will also be needed.

S.2.18.11

Any proposals for locating construction or other compounds on East Tilbury (Hazardous) Landfill Site should assess the risks associated with differential settlement of the heterogeneous wastes deposited, potential escapes of polluting leachates as a result of additional loading on the landfill surface reducing the porosity of the wastes and subsequent reduction in leachate storage capacity and possible presence of landfill gas.

S.2.18.15

All soils will need testing prior to determining appropriate storage provisions.

S.2.18.26

Temporary and permanent substations require appropriate design to preclude future pollution risks, especially in sensitive areas with regards to groundwater.

Environment Agency

Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH

Customer services line: 03708 506 506

Email: enquiries@environment-agency.gov.uk

www.gov.uk/environment-agency

S.2.18.29

We would like to see details regarding the nature of the TBM slurry.

S.2.18.33

We would like to see detailed Hydrogeological Impact Assessments for all dewatering proposals which should include risks to groundwater levels and quality, along with monitoring proposals. This is particularly critical for the Northern portal where dewatering is proposed in the area of an historic hazardous waste landfill.

S.2.20.3

We would like to see any proposals for new fuel stations at the proposed Rest and Services area(s).

Section 11 - Geology and Soils

S.11.4.5

All site investigation data and reports should be provided for review.

S.11.4.30

It is imperative that Tilbury Main and its tributaries are protected from any adverse impacts caused by works around East Tilbury landfill.

S.11.4.39

Assessment of tidal influences on levels in the chalk aquifer should determine whether they are a result of direct hydraulic continuity or tidal loading. It is imperative that the works do not alter the current hydraulic regime between the Thames and the chalk aquifer.

S.11.4.89

Gorham's Farm is currently permitted for restoration rather than impermeable capping.

S.11.4.105

We would like to see the detailed desk study report that has been compiled concerning potential contamination issues.

S.11.4.127

We note that soils information has been compiled from existing sources; we would like to see ground investigation reports for soils within the study area.

S.11.4.145

We would like to see an assessment in the ES of whether any UXO pose potential land or groundwater contamination issues.

Table 11.11

Potential effects and mitigation measures for construction

- we would like the ES to provide ground investigation data and interpretation regarding sink holes and the potential impacts of the works on the quality of

surface and groundwaters and any impacts on abstractions and designated ecological sites.

- we would also like to see the proposals for piling designs.
- full consideration of dewatering impacts on water quality and local abstractions and surface and groundwater is required.
- with respect to East Tilbury Landfill Site, any intrusive investigation should not penetrate confining geological barriers and create pathways for landfill contaminants to enter groundwater. If it is necessary to investigate groundwater or geological strata beneath the landfill site, drilling techniques suitable to maintain the integrity of the geological barriers and prevent the creation pathways to groundwater should be agreed with the Environment Agency.

Section 15 – Road Drainage and the Water Environment

S.15.3.3 and 4

The required water features survey (WFS) area will depend on the exact dewatering proposals; the exact WFS area for the northern portal is still to be finalised with the Environment Agency.

Table 15.7

It cannot necessarily be assumed the alluvium and tidal flats deposits effectively confine the chalk in all areas north of the Thames; this requires detailed assessment.

S.15.4.30

There are relatively few groundwater monitoring locations in the area north of the Thames; site specific monitoring data from nested piezometers will be required to inform the hydrogeological regime at key sites, especially in the area which may be affected by dewatering.

S.15.4.33 and 4

The assessment of aquifer vulnerability needs to consider areas if the chalk north of the Thames that are not covered by low permeability alluvium or London Clay; careful consideration of the degree of protection that is afforded to the chalk by the alluvium is required.

S.15.5.3

We would like to see the Hydrogeological Risk Assessment as soon as it has been completed please.

S.15.5.8 and 9

We agree with the listed aims of ground investigation and groundwater levels and quality works but would also like these to include reference to groundwater quality and in particular, north of the Thames, the potential issues with the historical landfill at East Tilbury Marshes.

Table 15.11

Potential construction effects and mitigation north of the Thames. This table should consider the potential for impacts on Mucking Flats and Marshes SSSI to the east of

Environment Agency

Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH

Customer services line: 03708 506 506

Email: enquiries@environment-agency.gov.uk

www.gov.uk/environment-agency

the northern portal site; the sections on groundwater resources, the South Essex Chalk and the Linford public water supply abstraction should also include the potential for mobilisation of contamination due to dewatering near the historical landfill site.

LTC#2 - PEIR Volume 2

Water Features Survey. Site visits are required for all sites within the finalised WFS area; a detailed Hydrogeological Risk Assessment for Dewatering (to cover pump testing and construction) will be required before the WFS area can be set.

Figures Volume 3a

Figure 2.2b

Shows an area of landscaped excavated material on the southern half of East Tilbury Landfill Site. Any such proposals must assess the impact of the additional loading on the landfill and potential emissions. If landscaping leads to increased surface water run-off, the Environment Agency should be consulted with regards to the ability of the existing drainage channels and sluices to cope with this extra volume of water.

We do not currently have sufficient detail on the proposals or the site area; this will hopefully be addressed by ground investigations and the Environmental Statement.

Biodiversity

Marine

We have assessed LTCs Preliminary Environmental Information Report (PEIR) consultation documents and are satisfied with their content in terms of marine water quality.

The main impacts on marine water quality from the proposals relate to the potential need for a new jetty or similar infrastructure in the River Thames (or there might be potential to reuse an existing jetty) to transport excavated tunnel material. In the longer term it may be that scour protection is needed in the riverbed (to maintain its stability) which is likely to take the form of either rock dumping or using mattress type solutions to cover the tunnel section. The need for scour protection and impact of other river-based construction activities will be further assessed in consultation with relevant statutory bodies.

We note that potential mitigation for impacts from the jetty includes “Jetty design which limits the number of piles and requirement for dredging where practicable. Where possible, use of soft start and vibro-piling techniques to limit extent and duration of noise emissions. Best practice methods for dredging operations.”

LTC is aware that a full Water Framework Directive (WFD) Assessment of the proposals will be required in due course and we note that (Section 15.5.10) “The

findings from all the above surveys and assessments will be used to inform a stand-alone Water Framework Directive Compliance Assessment, which is being scoped in consultation with the Environment Agency.”

Terrestrial ecology

The PEIR states that the drainage strategy in relation to the southern side of the Thames is still to be determined. Surveys are being carried out on the Ramsar to establish risks associated with the final proposed drainage plan.

It is noted that the plans retain in them a potential drainage route on the western end of the Ramsar/SSSI and this could therefore have a significant impact on the site. Ecological surveys of the area, as well as a full ecohydrological understanding of how this part of the Ramsar works will be required in order for us to determine the likely impacts of any proposed drainage routes. We therefore cannot determine at this stage whether this is an acceptable choice without the completion of surveys and designs.

It is noted that green bridges are proposed along parts of the Southern road. It must be determined that these are of sufficient size and design to function for all mammal species that currently utilise the area, as well as providing the necessary corridors for the movement of other species. The design should use contemporary evidence to establish minimum sizes and locations.

Volume 1, Chapter 9 Terrestrial Ecology

Page 261

It appears that the Essex Field Club, a major source of wildlife records, has not been consulted. They hold millions of records, many not held by the Essex Wildlife Trust Biological Records Centre.

Page 274

It is highly likely that slender hare's-ear and sea barley are found on the sea wall flood defences.

Page 278

There is a large population of eels in the main Mardyke channel. This needs highlighting.

Page 289

The importance of Tilbury Fort for wildfowl means that measures should be put in place to prevent their disturbance during and after construction.

Page 302

Given the prevalence of water voles in the development area, serious consideration must be given to avoidance, mitigation and compensation measures.

Page 303

There is a reference to two desk-based reports of otters. Given the quality of habitat along the main Mardyke channel, we believe that mammal ledges should be installed along any road culverts.

Page 305

Gap-filling surveys are important and should be undertaken as prescribed. We are particularly interested in the otter and water vole surveys.

Page 307

There is a lack of information on the impacts on fish (particularly eels) during construction and operation of the new road. Also what are the impacts on the Water Framework Directive potential of the Mardyke main channel and tribs.

Chapter 15. Road Drainage and Water Environment

Page 517

The culverting/pollution for Tilbury Main and Orsett Fen need significant offsetting as does the diversion channels. There must be no barriers to eel passage and enhancements where possible. This could include reprofiling to channel banks to benefit riparian wildlife and creation of fish refuges for eels. All bridges or significant culverts should include mammal ledges. Flood compensation and SuDs should be designed to form ecological features.

Clear span crossings are ideal although shading could be offset by channel enhancements downstream and upstream.

All new culverts should be accompanied with the creation of new river/stream habitat at a scale of at least 1:1. Where possible recreated habitats should be of higher quality than those lost to the scheme.

Environmental protection and waste

General comments

The applicant will need to identify where permissions such as environmental permits and abstraction licences are required.

Environmental permit pre-application advice can be found at:

<https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>

and

<https://www.gov.uk/guidance/waste-environmental-permits#get-help-with-your-application>

Abstraction licence pre-application guidance can be found at:

<https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence>

Environment Agency

Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH

Customer services line: 03708 506 506

Email: enquiries@environment-agency.gov.uk

www.gov.uk/environment-agency

LTC#1 - PEIR Volume 1

Page 23 drainage

2.9.4

It is good to see that attenuation basins will be provided which will improve water quality.

2.9.5

We are pleased to see that facilities will be installed to capture and contain pollutants arising from spillages.

2.9.6

Groundwater sensitivity and groundwater source protection zones should also be taken into account when considering drainage options.

Page 28 tunnel design

2.14.6

Suitable disposal routes for contaminated water such as that arising from wash down and fire fighting activities needs to be identified. Will infiltration water be saline? If so, discharge routes need to be considered as freshwater receptors will not be suitable to receive this water.

Page 493 road drainage and water environment

15.2.1

Table 15.2.1 should be updated to include The Environmental Permitting (England and Wales) Regulations 2016. Under Reg. 38 (1) of EPR 2016, it is an offence for a person to operate a regulated facility (for example, a groundwater activity or water discharge activity), or cause/knowingly permit a groundwater/water discharge activity, without an environmental permit.

The Environmental Damage (Prevention and Remediation) (England) Regulations 2015 should be considered.

Page 511 existing drainage

15.4.57 should also refer to Anglian Water Services Limited.

Page 514-524 effects and mitigation

Tilbury Main system (main rivers and ordinary watercourses) have been identified as a receptor for mobilised contaminated land leachates. Chalk and gravel aquifers and Linford public supply have not been identified as potential receptors for mobilised contaminated land leachates.

LTC# 13a-13f

LTC 13a sheet 9b identifies a rest and service access area at Tilbury junction. Foul water disposal arrangements will need to be considered. Suitably sized and designed oil separators will need to be included in the car park design.

Environment Agency

Orchard House Endeavour Park, London Road, Addington, West Malling, Kent, ME19 5SH

Customer services line: 03708 506 506

Email: enquiries@environment-agency.gov.uk

www.gov.uk/environment-agency

Annex C.2 Environment Agency Supplementary Consultation Response

David Manning
Lower Thames Crossing
Beaufort House
15 St. Botolph Street
London
City of London
EC3A 7DT

Our ref: KT/2018/124865/02-L01
Your ref: Lower Thames Crossing
Date: 02 April 2020

Dear David

LOWER THAMES CROSSING SUPPLEMENTARY CONSULTATION

The comments provided in relation to this supplementary consultation build on the same comments we provided from the Preliminary Environmental Information Report. Due to limited information available, we are unable to provide detailed reviews of the information submitted to date. We continue to welcome further engagement from the Lower Thames Crossing project to provide early input to key documentation and advice on mitigation, compensation and methodology in preparation for Development Consent Order submission.

Flood risk

We note the changes to the route and associated works and have some further comments to make in addition to those made on the previous consultation. We are currently awaiting further details of the flood modelling, which we know is currently being prepared and look forward to providing detailed comments once this information is available.

Crossing of the River Mardyke and Orsett fen Sewer

The proposed road will cross the River Mardyke and the Orsett Fen Sewer. The document does not detail the proposed height of the viaduct at this location, although we expect to receive the detail once the modelling has been produced.

Compensatory storage

We acknowledge the areas proposed for compensatory storage in map book 2 and look forward to further discussion on these areas as the detailed modelling becomes available.

Utilities update report

Any utility crossings such as temporary crossing (for construction for example), pedestrian bridge cycle ways, bridle ways requiring a permit should have modelling to support the application to show no increases in flood risk.

Environmental Mitigation Area at Coalhouse Fort

The proposed Environmental Mitigation Area immediately to the west of Coalhouse Fort is not fully protected against tidal inundation, and the defences only protect against tides up to a maximum of 20% AEP events. The defences protecting this site and presently damaged and repair is not guaranteed. We would be open to proposals from the applicant to address these issues.

Mardyke Viaduct

The movement south of the Mardyke Viaduct does not appear to have any significant impact of our activities for maintenance of the Mardyke or its tributaries versus the previous proposals. It is also noted that there is proposed permanent land acquisition for environmental mitigation at this location and along the River Mardyke as well as the Orsett Fenn and Golden Bridge Sewers. We would be open to proposals from the applicant to modify the channel profile of these watercourses to provide additional storage during times of high flows.

Bowaters sluice

The revised proposals do not seem to have any significant impact on this system compared to the previous proposals.

Section 7: Building the Lower Thames Crossing

In the section titled “ground preparation works” it mentions that “this construction activity would take place south of the river. It would start from a shaft located south of Lower Higham Road and travel to a shaft located north of the North Kent Railway Line.” It is unclear whether the Southern Shaft is within Flood Zone 1, however the Northern shaft will be located in Flood Zone 3. These works should be detailed within the Flood Risk Assessment and the flood risk and potential impacts appropriately assessed and mitigated.

The Northern element of these works are close to the main river, Shorne and Higham Marshes. We would want to understand the setback of these works from the river as the detail regarding this has not currently been provided. We would advise you that a Flood Risk Activity Permit may be required under the Environmental Permitting (England and Wales) Regulations 2016 if you want to do work:

- Within 8m of the bank of a main river, or 16m if it is a tidal main river
- Within 8m of any flood defence structure or culvert on a main river, or 16m on a tidal main river

Fisheries, Biodiversity and geomorphology

Terrestrial

The information provided is inadequate for us to comment on, as it fails to include sufficient technical detail on potential environmental impacts. Therefore we cannot provide any feedback on this consultation.

Marine

Section 4 of the report, Lower Thames Crossing Environmental Impacts Update 2020, confirms that changes to the marine works comprise only minor changes. These are to the development boundary to allow flexibility for the location where water will be discharged into the Thames (this would be excess groundwater removed from the construction or operation).

Therefore no significant changes to water quality are expected and effects will be no worse than reported in the PIER for either (i) construction of the temporary jetty or (ii) discharge of operational effluent via the outfall (which will be consented by the EA and controlled to minimise effects on Thames water quality).

Groundwater and contaminated land (inc permits)

Waste and materials

The changes highlighted in the Supplementary Consultation seem to have a negligible effect on the assessment on materials and waste presented in the PEIR. Even with Chalk Park (page 21) where additional landscaping is proposed as replacement open space to the east of Gravesend and surrounding the southern tunnel entrance.

Our previous advice still stands, the applicant will need to identify where permissions such as environmental permits particularly in relation to waste recovery, treatment, transfer, storage and long term stockpiling and abstraction licences are required. As part of that process we would expect a materials management strategy and proposed reuse criteria based on ground investigation of expected material types and classification/suitability for reuse, site-specific chemical criteria for reuse of excavated materials, treatment proposals for remediation of excavated materials and any the waste management and disposal options which will subsequently feed into a materials management Plan.

Also any site where waste was discarded or disposed of as waste in the past (whether the site now holds a permit or not) remains waste until it is recovered or disposed of. This includes historic landfills and past exempt activities (para 9's and 19's). Excavation of materials from a non-permitted site (historic) is not in itself a waste activity but the subsequent storage, treatment disposal and recovery are.

In this situation CL:AIRE DoWCoP cannot be used as that only applies to the direct use of excavated material produced in the course of development and used at a development site. DoWCoP may still be used elsewhere but not for excavated

waste. Waste will need to be treated before it is sent to landfill. This will include any waste excavated from old sites, inert and/ or non-hazardous.

Water environment

From a groundwater protection view on the south side the proposed changes do not alter any of our original assessment of the PIER. As ground investigations continue and assessment of any discovered contamination is made, we will discuss any required remediation as part of on-going DCO assessments/requirements and the EIA reporting.

The proposal for Chalk Park will need early discussion with us on detailed materials management options and any required permitting arrangements or agreements on other frameworks for materials re-use/deposits.

Any fundamental changes to drainage design will also require additional detailed discussions

Previous comments made about concerns around landfill sites have been taken on board.

Environmental Impacts update (P133 - road drainage relating to Marine Works). Any discharge to the estuary may also require a water activity permit. In the document we should also be included as a consultation body.

The route has moved to the east of Chadwell St Mary and may now be closer to the Linford public water supply, possibly within a Source Protection Zone 1 (SPZ1). Section 15.4.43 of the PEIR stated the project did not cross SPZ1. We will need this to be clarified.

Please refer the project team to our approach to groundwater protection and highlight position C4 on page 11:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf

Page 107 of the 'environmental impacts update' document identifies the Linford public water supply and states further assessment will be carried out. We would recommend that Essex and Suffolk Water are involved in this at an early stage.

The realignment route is adjacent to the Ockendon landfill; as such risks to controlled waters needs to be assessed. Intrusive site investigations in this area will need to be carried out according to the PIER prescriptions (such as safe drilling methods) and agreed with the Environment Agency.

The road in section 17 (the height of the LTC and North Road) has been lowered by two metres. As a result, North Road has also been lowered by two metres, resulting reported potential increase of groundwater seepage into the excavations. Risks to controlled waters needs to be assessed in terms of quality and quantity. Dewatering requirements and discharge need to be quantified and consented/permited.

A watching brief needs to be adopted during construction to identify visual/olfactory evidence of gross contamination.

Yours sincerely

Joanna Hodgson
Sustainable Places Technical Specialist

Direct dial 0208 4746716

Direct e-mail KSLPLANNING@environment-agency.gov.uk

Annex C.3 Environment Agency Design Refinement Consultation Response

Chris Taylor
Lower Thames Crossing
Beaufort House 15 St. Botolph Street
London
City of London
EC3A 7DT

Our ref: KT/2020/127273/01-L01
Your ref: Lower Thames Crossing
Date: 11 August 2020

Dear Chris

DESIGN REFINEMENT CONSULTATION LOWER THAMES CROSSING

Thank you for consulting us on the design refinements of this project before Development Consent Order submission.

Flood risk and assets

There are matters linked to the route of the proposed Highway that are being considered as part of ongoing consultations with the Highways Authority. We have recently provided comments on the further detail required regarding certain elements of the route design. Whilst we do not anticipate that these would lead to insurmountable issues, we await further detail in relation to elements of the design that will require flood risk activity permits (including methodologies for permanent and temporary works), and also relating to the overall tidal and fluvial flood risk modelling for the development area.

As acknowledged in recent discussions it is noted that for the purposes of efficiency the land behind the tidal defences at Coalhouse Fort is included within the proposal despite the present condition of the tidal defences there.

Settlement of proposed access road and landscaping feature at North Portal must be considered in order to ensure design levels can be achieved. Previous advice has indicated that substrata is near maximum loading capacity. Implications for maintenance of the River Mardyke in the area of the proposed environmental mitigation need to be discussed in greater detail.

We have the following minor comments to make on the submitted design consultation and look forward to receiving the detail in due course.

Map Book 1

Sheet 7a: The South Portal Discharge Options paper proposed to utilise an existing outfall as the preferred option whereas on the General Arrangement Plan (Sheet 7A) a new outfall looks to be proposed. Please confirm which approach is being taken so we can provide you with detailed advice.

Please be aware that a Flood Risk Activity Permit may be required.

Sheet 15. This plan shows the proposed locations on the Mardyke viaduct and the Orsett Fen viaduct. It also shows the embankments required to allow for construction of the road through this location. The embankments are located within the floodplain of the River Mardyke and its tributaries, and must be included within the flood modelling supporting any future application.

Sheet 16c.

It should be noted that the red line boundary for the utility works at this location cross a designated main river, known as 'Tributary to Stringcock Sewer'. A Flood Risk Activity Permit may therefore be required for works within 8 metres of the river.

Sheet 19.

North-west of North Ockendon flows a Main River known as West Branch Mardyke. A flood risk activity permit may therefore be required for works within 8 metres of the river and further information should be submitted regarding the crossing proposed here so that the proposals can be considered further.

Map Book 2

Sheet 6

The main works construction compound starts adjacent to Lower Higham Road, although majority of this construction compound is within Flood Zone 1 a small section adjacent to Lower Higham Road is within Flood Zone 3. From the plan it looks to be that most of these works may be below ground but additional detail needs to be provided to confirm whether this is the case.

For any works proposed in Flood Zone 3 the flood risk and potential impacts relating to the works should be appropriately assessed and mitigated.

Sheet 7

This map shows that there is a main construction compound adjacent to the North Kent Railway and Thames Medway Canal. The Shorne and Higham Marshes main river flows through most of this compound area. A Flood Risk Activity Permit may therefore be required.

Please provide further detail about the works proposed in this location so more detailed advice can be given.

As this compound area is within Flood Zone 3 the flood risk and potential impacts will need to be appropriately assessed and mitigated. We do not have flood modelling for the Shorne and Higham Marshes main river/ditch network. Therefore, modelling will be required to assess the associated flood risk.

Environmental Impacts Update

We have no specific comments to make on this update report as it does not provide sufficient information for us to make a detailed response. We note that detailed measures will be repowered within the Environmental Statement, which will be submitted in due course.

Groundwater and contaminated land

We have no concerns from a groundwater impact perspective for the majority of the amendments to the Design Consultation. Most have been identified previously and mitigated for. The document appears to be in line with the agreed PIER for matter involving drainage, soils and materials management in the area to the South of the River Thames.

Section 24 New water supply from the Linford borehole and a local water main and Section 25 Potential upgrade of the existing water network.

We were wondering if the supply of water from Linford PWS been officially confirmed with Essex & Suffolk Water? The Water Framework Directive (WFD) status of the South Essex Thurrock Chalk has reduced to 'poor' for Cycle 3, as it has failed the Groundwater Balance Test. Linford PWS, has modelled at its licenced rate, is a contributing factor. We recognise also that in recent years the Linford abstraction has been underutilised. If not already established the water resource availability should be further discussed and confirmed with Essex & Suffolk Water and the Environment Agency.

Environmental pollution

There appears to be fairly minor changes from an environmental pollution point of view.

The document refers a lot to 'Operational effects are the same as those described in the PEIR' and 'Pollution risks during the construction phase are going to be managed through the CoCP and CEMP'. We look forward to receiving further information around these in the submission document.

Fisheries and biodiversity

19. Northern tunnel entrance layout

Loss in continuity of a watercourse, such as putting in a culvert, will affect the ecological aspects along the length of the waterbody and could reduce its Water Framework Directive status. We recognise that the length of this culvert has been

reduced by 20m, however it still will impact the movement of fish and invertebrate populations within this catchment.

As mentioned previously in this letter the land behind the tidal defences at Coalhouse Fort is included within the proposal. The viability of freshwater habitat creation is questionable at this location due to the current condition of the tidal defences. We look forward to working with you more in agreeing a solution for this habitat creation.

Yours sincerely

PP Laura Edwards

Joanna Hodgson
Sustainable Places Technical Specialist

Direct dial 0208 4746716

Direct e-mail KSLPLANNING@environment-agency.gov.uk

Annex C.4 Environment Agency Community Impact Consultation Response

Mr Matt Palmer
Lower Thames Crossing
Beaufort House 15 St. Botolph Street
London
City of London
EC3A 7DT

Our ref: KT/2021/128817/01-L01
Your ref: Lower Thames Crossing
Date: 08 September 2021

Dear Mr Palmer

COMMUNITY IMPACTS CONSULTATION

LOWER THAMES CROSSING

Thank you for consulting us on the additional and updated information for the Lower Thames Crossing (LTC).

The Environment Agency has an agreement in place to provide pre-application advice and have been working with LTC throughout the project. Comments on specific documents are being made directly to LTC through this service as well as our permit pre-application advice service.

We request that there is a timely flow of information between LTC and the environment agency to ensure we are able to provide the required advice.

We would like to highlight some of the work we have done together to improve the scheme for the environment.

- Moving the southern tunnel entrance 600 metres south, reducing the interaction with groundwater bodies in the area
- Initially moving the location of the proposed Rest and Service area from the closed East Tilbury Landfill to further north
- Removing East Tilbury Landfill from the red line boundary area
- Changing the scheme design from an earth embankment to viaducts through the Mardyke Valley to reduce the impact of the project on flood risk and the river environment
- Increasing the proposed viaduct lengths by 50 metres to reduce impact to the flood risk and reduce environmental impact to the river environments

- Altering the route of the road around Ockenden Landfill to reduce potential environmental impacts
- Removing of the proposed Rest and Service area, reducing impact on the environment and flood risk
- Finding a suitable, long term site for freshwater habitat creation which will benefit the local area
- Improving the flood protection around the northern tunnel entrance including allowance for increased defence levels in accordance the Environment Agency Thames Estuary 2100 plan
- Reviewing Groundwater Investigations around the proposed location of the southern portal to ensure that ground water flow and dependencies were understood
- Reviewing Ground Investigations around the northern portal location to ensure that groundwater flow and dependences to public water supply are understood as well as the interaction with the local landfill sites
- Reviewing Ground Investigations along the route to assess the impact of the proposed cuttings on the flow of groundwater, local abstractions, and water dependent sites
- Increasing the number of green bridges in the scheme to maintain the connectivity of wildlife between habitats
- Moving of compound locations out of environmentally sensitive areas

Securing Biodiversity Net Gain for the project We continue to work with LTC on various aspects of the scheme in preparation for their Development Consent Order submission. We hope this working arrangement will continue after examination, throughout the construction phase of the scheme and into the Legacy work.

Yours sincerely

Joanna Hodgson
Sustainable Places Technical Specialist

Direct dial [REDACTED]

Direct e-mail KSLPLANNING@environment-agency.gov.uk

Annex C.5 Environment Agency Local Refinement Consultation Response

From: "Lower Thames Crossing" <lrc.consultation@traverse.ltd>
Sent: Fri, 17 Jun 2022 09:38:15 +0000
To: "Traverse I4461 at Adetiq" <traverse.I4461@adetiq.co.uk>
Subject: FW: Local Refinement Consultation response from EA
Attachments: 20220617 EA refinement con response.pdf

From: KSLPlanning <KSLPLANNING@environment-agency.gov.uk>
Sent: 17 June 2022 10:36
To: Lower Thames Crossing <lrc.consultation@traverse.ltd>
Cc: sam.ireland <sam.ireland@lowerthamescrossing.co.uk>
Subject: Local Refinement Consultation response from EA

Please find attached the response for the Local Refinement Consultation from the Environment Agency.

Kind regards

Jo

Joanna Hodgson Sustainable Places Specialist, Kent, South London and East Sussex
Environment Agency Orchard House, London Road, Addington, West Malling, ME19 5SH
☎ 0208 4746841
✉ KSLplanning@environment-agency.gov.uk

If you're planning a new development, we want to work with you to make the process as smooth as possible. We offer a bespoke advice service where you will be assigned a project manager who be a single point of contact for you at the EA. This early engagement can significantly reduce uncertainty and delays to your project. More information can be found on our website [here](#).

Please note – Our hourly charge is now £100 per hour plus VAT.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Office 501, 31-35 Kirby Street, London EC1N 8TE

www.traverse.ltd



Traverse is the trading name of Office for Public Management Ltd.

Views expressed in this message are those of the individual sender, except where it is specifically stated that they are the views of Traverse.

This email, and any files transmitted with it, is confidential and intended solely for the person to whom it is addressed. Although we take steps to safeguard inbound and outbound emails, we cannot guarantee that attachments are virus-free or compatible with your systems and we do not accept liability in respect of any problems you may experience.

Office for Public Management Ltd is registered in England and Wales number 2343617.

Gareth Protheroe
Lower Thames Crossing
Beaufort House
15 St. Botolph Street
London
EC3A 7DT

Our ref: KT/2022/129762/01-L01

Date: 17 June 2022

Dear Gareth

LOWER THAMES CROSSING: LOCAL REFINEMENT CONSULTATION

Thank you for inviting us to comment on the Local Refinement Consultation for the Lower Thames Crossing.

As you are aware, the Environment Agency has an agreement in place to provide pre-application advice and have been working with LTC throughout the project. Comments on specific documents and themes are being made directly to LTC through this service as well as our permit pre-application advice service.

We have been working with LTC to protect the environment since the preferred option was chosen. We continue to provide advice and guidance on key elements such as flood protection, water quality, groundwater resources and protection, waste management and permitting.

We request that there is a timely flow of information between LTC and the environment agency to ensure we are able to provide the required advice.

We are still working with LTC on various aspects of the scheme in preparation for their DCO submission. We hope this working arrangement will continue after examination and throughout the construction phase of the scheme as well as with the Legacy work.

Yours sincerely

Joanna Hodgson
Sustainable Places Technical Specialist

Direct dial [REDACTED]

Direct e-mail KSLPLANNING@environment-agency.gov.uk

Annex C.6 Tilbury Main Diversion Options, Choosing By Advantage Light (HE540039-CJV-GEN-GEN-MIN- DCO-00002)

Stakeholder Meeting Minutes Lower Thames Crossing

Tilbury Main Diversion Options CBA 'Lite'

Date: 16 December 2019

Location: LTC Office, Beaufort House, Aldgate, London

Ref: HE540039-CJV-GEN-GEN-MIN-DCO-00002

Attendees:

Name	Initials	Organisation
Alistair Kean	AK	LTC Sustainability Lead and Lean Champion
Elle Christmas	EC	LTC DCO Environment Coordinator
Kirstie Goldsmith (dial in)	KG	LTC DCO Environment Lead
Margarita Agriodima (dial in)	MA	LTC Flood Risk Assessment Author
Matt Robson	MR	LTC Marine Ecology Lead
Neil Phillips	NP	LTC Tunnel Material Specialist
Nick Clark (dial in)	NC	LTC Ecologist
Ramzie Vadakkayil (dial in)	RV	LTC Highways North Engineer
Sam Ireland	SI	LTC Environmental Stakeholder Engagement
Sam Marles	SM	LTC Ecologist
Karolina Allu	KA	EA Planning Specialist
Jo Hodgson	JH	EA Sustainable Places Specialist
Penny Fox (dial in)	PF	EA Biodiversity Officer (covering Tilbury)
Trevor Bond (dial in)	TB	EA Fisheries and biodiversity team leader.
<i>Apologies: Lisa Driscoll</i>	<i>LD</i>	<i>LTC Water Environment Lead</i>

Meeting notes:

Purpose of meeting
For LTC to present the various options for the Tilbury Main River where it crosses the route and to discuss the assessment and decision-making, to see if a preferred solution can be agreed and to mutually acknowledge the assessment outcome.

Actions:

New Action	Owner	Para Ref
1. Set up meeting for Environment Agency (JH; KA; TB; PF) with Lisa Driscoll (LTC Water Environment Lead).	LTC (SI / KG)	3.2.3

Discussion points

1. Tilbury Main Diversion Options and Assessment

1.1 **Presentation of options and assessment** were introduced by AK and NP (see presentation for details) comprising:

- 1.1.1 Shorter culvert – 65m shortest combined corridor is the most practical option;
- 1.1.2 Divided river;
- 1.1.3 Longer culvert – 550m;
- 1.1.4 Open channel;
- 1.1.5 Pumping.

1.2 **Simplified Choosing By Advantage (CBA) chart** introduced by AK, representing advantages of each option in green notes, as taken from LTC's 'Options Crossing for Tilbury Main' report (ref. HE540039-CJV-EFR-GEN-TNT-00004 V2.0); pink notes indicate the challenges / key disadvantages of each option over the following topics.

1.3 Hydromorphology:

- 1.3.1 Short culvert:
 - 1.3.1.1 MA highlighted the key dimensions of the culvert; there is an existing pipe which is currently a constraint for flow – this larger diameter box culvert offers better flow.
 - 1.3.1.2 The culvert would include a mammal ledge.
 - 1.3.1.3 Hydraulic modelling will be undertaken to allow for climate change / flooding.
 - 1.3.1.4 Proposed box culvert provides betterment compared to existing pipe in terms of hydraulics.
 - 1.3.1.5 Shows the least impact in CBA analysis.
- 1.3.2 Divided river:
 - 1.3.2.1 Disrupts existing hydromorphology.
 - 1.3.2.2 Impacts performance due to the increased length of the channel resulting in slower flow due to lower gradient. This may also increase siltation.
- 1.3.3 Long culvert:
 - 1.3.3.1 Too long to be practical.
 - 1.3.3.2 Length / gradient reduces hydraulic performance.
- 1.3.4 Open channel:
 - 1.3.4.1 1km diversion to the south (Tilbury Main) is significant.
 - 1.3.4.2 Gradient likely to be reduced therefore reducing hydraulic performance of Tilbury Main. This may also increase siltation.
- 1.3.5 Pumped:
 - 1.3.5.1 Fully dependent on mechanical solution.
 - 1.3.5.2 creates complete break in the river.

1.4 **Topography:** Presented by NP with details regarding the landfill, overview of the topography, drainage ditches (ordinary watercourses). Historic landfills throughout the area. Any options that require works in Goshems landfill – require a very wide channel with approx. 20-degree side slopes, therefore an enormous volume of landfill excavation and redeposition. AK pointed out that no advantages have been identified for the longer culvert or an open channel going through Goshems landfill.

- 1.4.1 Short Culvert – some foundations required; groundworks required.

- 1.4.2 Divided river – neutral as taken outside of landfill to the west.
- 1.4.3 Long culvert:
 - 1.4.3.1 Foundations required;
 - 1.4.3.2 Complications with tunnel portal structure – heavy engineering required.
- 1.4.4 Open channel:
 - 1.4.4.1 Natural but geotechnically very challenging;
 - 1.4.4.2 Very shallow side slopes would be required on deep excavations through the landfill.
- 1.4.5 Pumped – foundation work required.

1.5 Geotech and contaminated land:

- 1.5.1 Leachate issue: the long culvert or open channel would need construction / works would be below the level that leachate would leak out of the landfill – both of these options would require the opening of landfill to get the structures built.
- 1.5.2 Tunnel engineering complexity – longer culvert linking in with portal; longer culvert piled foundations that could impact on the structure of the portal.
- 1.5.3 The pumped solution and short culvert are likely to require piled foundations. Foundations would be less significant for the pumped solution.

1.6 Ecology (NC):

- 1.6.1 Short Culvert:
 - 1.6.1.1 Acknowledged that a short culvert is not the preferred choice from an ecological perspective and that there are not many natural ecological advantages.
 - 1.6.1.2 Design replicates exiting channel in terms of hydraulics, depth and flow to facilitate eel passage and invertebrate passage. No impact on eel passage is likely.
 - 1.6.1.3 Base of the culvert to be sufficiently low in order to allow a natural bed to be created.
 - 1.6.1.4 Water Voles (NC): acknowledged that any culvert is detrimental for water voles due to the significant risk of habitat fragmentation. With the proposed design including mammal ledges and appropriate headroom, the short culvert could maintain some connectivity east and west. However, there is no precedent for this so fragmentation seems likely.
 - 1.6.1.5 NP commented that some natural curvature would be added into the culvert so it is not a straight line. It would be built offline and then the river would be diverted into it.
- 1.6.2 Divided river:
 - 1.6.2.1 No ecological advantages due to fragmentation of habitat.
 - 1.6.2.2 The additional length of the river could be colonised by water voles but the issue of fragmentation outweighs the additional length of open water course that could be achieved.
 - 1.6.2.3 The divided river solution would have a slow discharge rate, which is a key consideration for siltation and the impact on species (MR).
- 1.6.3 Long culvert:
 - 1.6.3.1 Eels and water voles negatively impacted; vole population will be fragmented because it would be too long for the voles to use. No ecological advantages.
 - 1.6.3.2 As per the short culvert, it would be built offline and watercourse diverted into it.

- 1.6.4 Open channel:
 - 1.6.4.1 Neutral impact for eels;
 - 1.6.4.2 Would naturally be a preferred option from an ecological perspective. However, the risk of mobilizing contaminants / leachate from the underlying landfill is a significant risk – this would affect the vole population.
 - 1.6.4.3 Owing to underlying landfill would be a significant risk of leachate contaminating water and therefore affecting habitat / animal populations.
 - 1.6.4.4 Would require removing large volumes of spoil prior to building the structure – opening the landfill, which is high risk from a contamination perspective.
- 1.6.5 Pumped:
 - 1.6.5.1 Ecologically no advantages.
 - 1.6.5.2 Would totally prevent passage of eels and other fish species.

1.7 JH – queried drainage ditch close to the river that will be cut off by the road – what is the interaction between the drainage ditch and the river? NP – doesn't think there is any interaction – the ditch is an artefact of groundwater levels and can dry out; it is not viable from a fish population perspective.

1.8 JH – queried if the channel would be steep sided as it could present issues regarding shading in the channel. AK – unlikely to be an issue; channel cannot be steep sided due to the engineering challenges.

1.9 Construction:

- 1.9.1 Temporary diversion of the main river would be required for all options (NP).
- 1.9.2 Query regarding culvert maintenance – would be Highways England's responsibility (AK). The culvert options would be self-cleaning, although this likely to be more effective with the shorter culvert.
- 1.9.3 Pumps would require significant mechanical and electrical maintenance. They are a potentially higher risk option in the instance of them failing in a flood scenario.

2. Discussion of Advantages and Disadvantages

2.1 TB considers an assumption is being made regarding the passability of water voles and other ecological receptors. TB feels that there is an evidence gap in proving that a 65m culvert is passable and suspects the culvert will disconnect the habitats on either side of the road.

2.2 TB also considers that there is an evidence gap regarding the length of culvert that is acceptable for various ecological receptors.

2.3 NC response – LTC has acknowledged that there is the downside of fragmentation through use of a short culvert, but there are the least number of disadvantages and the least negative impacts, compared to the alternatives, from a broader planning perspective. 65m is potentially passable, whereas 500m is not.

2.4 TB queried if it was an assumption to say that a short culvert is any different ecologically compared to a long culvert – discussion followed regarding the

advantages and disadvantages identified for the long vs short culvert (as detailed above in discussion point 1).

2.5 TB stated that on the basis of the discussion he would concur that the short culvert is better in principal.

2.6 AK – queried if the EA had any further recommendations for design of culvert to improve it. MR responded with detail from LTC as within the limitations of a culvert design LTC is trying to provide the best possible solution from an ecological perspective, including the following:

2.6.1 It is good practice to sink culverts low enough to introduce natural material in the stream bed.

2.6.2 Baffles should be avoided from a debris and maintenance perspective.

2.6.3 The design will replicate the existing channel in terms of size and function – there is no change in hydraulics therefore no change in watercourse for eels and fish.

2.6.4 LTC acknowledge that culvert is dark for fish passage, but there is no evidence to suggest that darkness is an issue.

2.6.5 Within culvert will not get macrophyte growth but within the limitations of the design LTC is trying to find the best possible solution from an ecological perspective.

2.7 MR – for fish species and eels and in-channel short culvert is a suitable solution.

2.8 MR – the planning and construction complications of the open channel means that it is not a viable solution.

2.9 TB – queried whether a behavioural barrier could be presented for e.g. water voles due to lack of vegetation, to hinder species from passing through culvert.

2.10 TB – none of the options avoid fragmenting the water vole habitat. Concerned that under the Water Framework Directive (WFD) the potential for deterioration [due to fragmentation] would require consideration.

2.11 MR – queried which elements of WFD would be most impacted by the short culvert proposal. TB response: eels, macrophytes; fragmentation and disconnection; consideration of impact on the entire downstream ecology or indeed upstream ecology.

2.12 KG asked for clarification regarding perceived issues upstream ecology issues:

2.12.1 TB (EA): Eels; coarse fish such as bream and roach may migrate within this catchment (these species migrate upstream to spawn).

2.12.2 Response from MR (LTC) – the catchment area is not ‘spectacular’ since the water courses are essentially field drains and there is not much diversity within the field channel. Culvert design is key to minimise any negative impacts on communities. Beyond eels, other species are minor. As previously mentioned, the culvert design will address water depth and water flows to mimic hydraulics upstream and downstream. May need to accept potential impacts and offset elsewhere in the scheme.

2.12.3 Noted that LTC has not surveyed the channel for fish species – based on the physical characteristics of the channel, LTC can assume that eels and minor fish species are present.

- 2.12.4 NC – it should be noted that the CBA light approach doesn't take account of the ability to offset the impacts of each approach.
- 2.12.5 TB – connectivity of the landscape / habitat is the key issue. Does not think it has been fully represented in CBA diagram – AK countered this point reflecting that the diagram does indicate that the vole habitat is split.
- 2.12.6 TB – do otters use the catchment and if so how would LTC prevent road fatalities?
- 2.12.6.1 NC – can address concerns about e.g. crossing roads with fencing. Confirmed that there is no firm evidence to indicate that animals would use a culvert of this length. Best practice guidance says 30-35m max. Beyond that information it is acknowledged that we can't rely on the culvert as a robust mitigation approach.
- 2.13 TB – made reference to other sites that have presented alternative options to the culverting / the options presented by LTC.
- 2.13.1 KG requested examples / if there were opportunities that the EA could provide regarding such sites to facilitate learning from experience.
- 2.13.2 TB cited EDF site that has used an open span bridge.
- 2.13.3 KG asked the LTC project team to respond on the potential for using / complications of using an open span bridge:
- 2.13.3.1 Constraints for open span – has the potential for a more naturalised bed but will be the same width or slightly narrower.
- 2.13.3.2 Open span would be constrained in terms of elevation because of the proximity to the portal. Currently 3% gradient coming out of the portal – if the gradient was increased it would lead to higher CO₂ emissions (therefore decreased air quality and increased carbon footprint), as well as safety risks due to slowing HGVs.
- 2.13.3.3 In addition, an open span bridge would create the need to take a viaduct over station road and the Tilbury loop line. From a planning perspective, the project is trying to mitigate visual impact of road by keeping the viaduct lower.
- 2.13.3.4 JH – what percentage incline would we need to increase to, to accommodate an open span bridge?
- 2.13.3.5 NP – probably 4%. Other factors to consider – open span also requires increased maintenance and inspection whereas the culvert doesn't. This would require operatives to get to the underside of the bridge to inspect it, over a water feature – significant safety risk moving forward.
- 2.13.3.6 AK – further point to note is that an open span bridge would end up being very similar to a culvert due to the length and depth (very shallow) so would not provide increased ecological value.
- 2.13.3.7 NP – the bridge option would also be less in keeping with the overall reinstatement of the embankment and engineered fill / green embankment – would instead need to be concrete flood protection walls 3.5m above road level at that point and side road sat up at 7.6m therefore would take up more land.
- 2.13.3.8 AK queried if an open span structure with these constraints would allow vole passage, given that it would be at least 40m long and need to allow for structural abutments. Vole passage considered as challenged as short culvert.
- 2.13.4 TB – clear from the discussion that open span is not a viable alternative to the proposed options.

2.14 PF – should it be assumed that a culvert can't have a natural bottom due to contaminated land?

2.14.1 MR response – the culvert would fill with natural material by being set lower.

2.15 PF – could there be light holes along the length of the culvert e.g. in the central reservation?

2.15.1 NP – very difficult to implement light holes e.g. in central reservation of road need to make sure they're not leaking / flood water could rise through the centre and then flood the tunnel (huge safety risk). Would need to surround the light holes by a 3.5m concrete wall to mitigate flood risk so would form a dark shaft.

3. Conclusions

3.1 LTC Closing comments:

3.1.1 Short culvert presents the best overall option from a planning perspective.

3.1.2 As discussed, none of the other options presented in the CBA 'lite' present a significant benefit over and above the short culvert option, including open span bridge.

3.1.3 NC – planning balance is required. On assessment of all available options, it is acknowledged that there are detrimental effects with the short culvert but overall it is the most practicable option. Need to agree that this is the best option overall, although not ideal ecologically and reflect that in the statement of common ground.

3.1.4 NC – currently focussed on downsides and not focussed on compensation – require a licence from Natural England but need to demonstrate conservation benefits to species in area. Currently discussing with Natural England and the Wildlife Trust. In addition, further work is being undertaken in parallel to this to make sure we are mitigating impacts across the area e.g. part of the ongoing work is to support wildlife trust with mink control (of benefit to the water vole population).

3.2 EA Closing Comments:

3.2.1 JH – question regarding overall impact that short culvert could have on the watercourse in relation to WFD.

3.2.2 Would like evidence that a 65m length culvert is reasonable given best practice guidance is 35m max.

3.2.3 JH – could be an issue to be recorded in the SoCG (LTC agreed).

3.2.4 Would benefit from a discussion with Lisa Driscoll (LTC Water Environment Lead) regarding the WFD aspect.

3.2.5 TB – moving forward with the culvert would be acceptable on the basis that any deterioration is confined within the current watercourse quality classification – therefore can proceed while being mindful that further discussion / confidence is required regarding WFH and potential ability for water vole migration along the length of the culvert. PF and JH in agreement.

3.2.6 JH – assess river system as a whole rather than looking at one specific species.

3.3 Acknowledged Assumptions:

3.3.1 Fish species have been assumed to be present on the basis of the structure of the catchment, experience gained along the Thames, Team 2100 data.

3.3.2 Highways England would maintain the culvert.

4. LTC Position

4.1 It is likely that the project will proceed with the short box culvert option, which is acknowledged to have detrimental impacts ecologically but is the better option from an overall planning perspective.

4.2 LTC will consult with the EA on the WFD to ensure full engagement, consideration and discussion regarding all relevant technical information, prior to formally mutually agreeing our positions for the SOCG.

4.3 LTC will record all relevant matters within the Statement of Common Ground.

5. EA Position

5.1 Understand LTC approach with short culvert.

5.2 Currently hold concerns regarding the WFD requirements.

5.3 Currently hold concerns regarding the length of the short culvert at 65m and viability for water vole passage in comparison to best practice recommended maximum length of 35m.

5.4 TB agreed that the short culvert presented the 'least worst' option.

Annex C.7 WFD Implications of Culverting Tilbury Main (HE540039-CJV-GEN-GEN-MIN-STK-00801)

Stakeholder Meeting Minutes Lower Thames Crossing

WFD Implications of Culverting Tilbury Main

Date: 13/01/20

Location: LTC Office, Beaufort House, Aldgate, London

Ref: HE540039-CJV-GEN-GEN-MIN-STK-00801

Attendees:

Name	Initials	Organisation
Tom Cook	TC	Environment Agency
Penny Fox	PF	Environment Agency
Jo Hodgson	JH	Environment Agency
Trev Bond	TB	Environment Agency
Ulisse Pizzi	UP	Environment Agency
Kirstie Goldsmith	KG	Lower Thames Crossing
Michael Wilson	MW	Lower Thames Crossing
Nick Clark	NC	Lower Thames Crossing
Matt Robson	MR	Lower Thames Crossing
Sam Ireland	SI	Lower Thames Crossing
Elle Christmas	EC	Lower Thames Crossing

Meeting notes:

Purpose of meeting
To discuss the likely WFD implications of culverting Tilbury Main.

Actions:

New Action	Owner	Para Ref
JH to send through comments from colleagues on Stage 3 WFD Assessment	JH	2.11

Discussion points
<p>1. Introduction & Update</p> <p>1.1 SI- A Choosing by Advantage (CBA) light session was held before Christmas to identify the likely advantages and disadvantages of each option including:</p> <ul style="list-style-type: none"> - Shorter culvert – 65m narrowest combined corridor is the most practical option - Longer culvert – 550m - Divided river; - Open channel;

- Pumping.
- 1.2 SI- LTC's best option based on engineering, environmental impact and considering an overall planning perspective is the shorter culvert.
- 1.3 SI- LTC understand the EA's policy is against culverting, but in our meeting before Christmas the EA acknowledged that the shorter culvert option is the least-worst (acknowledging that WFD impacts were not discussed).
- 1.4 SI- the Second part of the meeting will cover the WFD stage 3 assessment.

2. WFD implications of culverting Tilbury Main

2.1 LD- Stages 1, 2 & 3 of the WFD assessment have been submitted to EA. Stage 4 is being drafted now and being informed by groundwater modelling assessments.

2.2 LD- We understand that some of the EA's the key concerns are around the effects on the biological quality element of the Tilbury Main.

2.3 LD- The physical, chemical and specific pollutant assessments are in accordance with DMRB guidance for the drainage catchment discharging into the Tilbury Main. The assessment has shown that we are compliant. This gives comfort that we won't be impacting those elements of the WFD status of the watercourse.

TB- this is acceptable. Our concerns primarily relate to the connectivity of the landscape – flora and fauna impacts are of more concern.

2.4 LD- What is the EA's position on the principal of improving and enhancing other reaches of the Tilbury Main or nearby watercourses to offset the impacts of culverting; for example, creating water vole habitat?

TB- water vole aren't technically a WFD target species as they are not one of the quality elements. Fish and eels are more important to WFD assessment than water voles.

LD- consideration of water vole would be higher level-impacts on general habitats.

TB- agree. Welcome that this is included. One of the components of the assessment will be the baseline condition. EA don't have any baseline data. What we need to understand is what is there, and what the impacts of the proposed impact may be i.e. will this cause a deterioration of the organisms there? Fish and eel are more important to the WFD assessment than water voles would be. Is 65m passable for fish and eel? This should be covered in the WFD assessment.

LD- is the principal of enhancing other reaches acceptable?

TB- The principal with the WFD assessment is one out, all out. Generally, don't talk about mitigation and compensation in relation to WFD. It is possible but it depends on the species present and if this effects their connectivity.

LD- focus is fish and eels. No strong baseline. Difficult to determine deterioration.

2.5 MR- We went out to site to verify if the desk-based information is right. Most of the channel would be overgrown during the summer with very little open water. During site visit there was lots of silt and the water was shallow. There were some crabs in the lower section which suggests that there may be connectivity through the flood defence. It's possible that eels may be

using the catchment (assuming that it doesn't dry out completely). It was very limited in terms of other species due to overgrown nature of the channel. 65m culvert has the potential to effect connectivity. In terms of connectivity of eels, this could be addressed by the design of the culvert. Limited in terms of fish species based on data collected to date and on site. TB- will the proposal cause a deterioration? We need to understand what the culvert will impact upon.

MR- the purpose is to retain the connectivity wherever possible, but the length of the culvert is clearly an issue. If the hydraulics are right, it shouldn't prevent fish from moving through the culvert if the flows permit. The watercourse seems to be subject to fluctuating flows. Ephemeral nature identified during the summer period. There is little evidence to support that shading provided by the culvert will affect migration, particularly as most species migrate at night.

2.6 MR- The invertebrate community here is not diverse. Not sure if the culvert would lead to a deterioration of the communities. Due to the low flows, it has a ditch type community

TB- wouldn't expect to see assemblages associated with fluvial fresh water condition. What is the impact based on this baseline? Species may be resilient to change.

MR- the intention is to provide the assessment giving a view as to whether there would be a significant impact in status deterioration. There is no baseline.

TB- Even if there isn't a deterioration i.e. high→good, if there is a measurable and visible deterioration it still counts as a deterioration. WFD legislation does allow temporary impacts. In other projects this is anything less than 1 year.

2.7 JH- NE are license holders for water vole, have they been consulted?

NC- We are in discussion with Sean and Jonathan along with Amy Radford (protected species licensing officer). We are also working with Essex wildlife trust to look at a catchment wide approach. This includes a broader scale mitigation approach. This may include mink control, with the objective of releasing water voles into a catchment clear of mink.

2.8 LD- we need to make sure that the assessment provides a robust baseline and sets out the design philosophy of the culvert and how we are reducing impact where possible.

2.9 TB- although there is no obligation it would be good to see discussions around how to improve the status of the waterbody for WFD

2.10 KG- from an engineering and mitigation point of view and from an overall planning perspective the short culvert is the least impactful. We need to clearly demonstrate why this is the case. Hopefully EA can see why we are taking this position.

JH- concern from EA that the culvert will cause a deterioration to the watercourse.

KG- this is what the assessment will address the concerns on. We are working to address them.

TB- recognise that these aren't the highest quality watercourse. If the assessment determines that there is a deterioration, article 4.7 of the WFD may apply which states that even if deterioration will occur in some

locations, the project can still go ahead if it warrants the deterioration. This will need secretary of state sign off.

2.11 Key points from WFD discussion:

LD – ensure all assessments have a robust baseline.

LD – set out design philosophy.

TB – include any measurable impact (regardless of the quality of the starting point).

TB – potential to improve the status of the water body would be an excellent aspiration to have and consider as an outcome.

ACTION: JH to send through comments from colleagues on Stage 3 WFD Assessment.

3. Stage 3 WFD Assessment

3.1 LD- We are breaking down the development into different components of work, which waterbodies may be affected, and which elements may be affected. The stage 3 assessment will screen in and screen out elements for stage 4.

3.2 UP- Some minor comments based on the review to date. In table 1 in section 2.2.1 there is a demolition of an existing of existing petrol station. This could affect WFD water qualities and needs to be included in the assessment. Tables 3, 4 & 5 need to be linked back to tables 1 and 2 to make it more logical.

LD- the petrol station hasn't been included because the remediation works (to ensure there is no pollution risk) is being progressed ahead of the rest of the development.

JH- Jonathan Atkinson also asked for southern portal compound fuelling information to be included

3.3 TB- temporary works issue to be included. Assessment is well laid out and has gone through the appropriate stages. Everything included.

3.4 JH- need to include all watercourses including all non-WFD bodies.

TB- this is mainly applicable to the Tilbury Main. All waterbodies do need consideration, not just those on the catchment data explorer. Anything classified as main river needs consideration. LAs should be leading on WFD elements of the ordinary watercourses.

LD- Tilbury Main and first order tributaries of the Mardyke are included, along with the catchment in between.

TB- sounds proportionate.

3.5 JH- In terms of screened out components- ideally temporary impacts of 1 year rather than 3 years should be considered.

TB- The nature of the activity should be assessed ecologically to determine what is 'temporary'. What happens if temporary impacts coincide with a period of drought for example?

3.6 TC- The long-term impacts of the jetty has been screened out. Does the jetty require planning permission for long term use? It currently has temporary permission for a period of 5 years.

MR- the current jetty that IVL use has permission on it. Plan is to seek a temporary extension. If this isn't possible, we would look to install another

one in the same location. This wouldn't be a permanent jetty. It will be assessed as a temporary structure.

TB- The jetty was screened out as it was considered a like for like replacement. If it's a variation it needs to be included in the assessment

TC- it may not be possible to get a like for like.

MR- the intention is to replicate it in terms of piling and the desk structure.

In terms of the location we are constrained with what we can construct. Not looking to construct a jetty to the deep-water channel for example.

3.7 TB- the assessment may need to be altered in the future. Can it be an active document if things do change in the project?

LD- yes agree that it would be an active document as the project progresses.

KG- please send any comments back to Kirstie on the minutes from the previous meeting by 24th January.

4. LTC Position

4.1 It is likely that the project will proceed with the short box culvert option, which is acknowledged to have detrimental impacts ecologically but is the better option from an overall planning perspective.

4.2 LTC will formally mutually agree positions with EA for the Statements of Common Ground.

5. EA Position

5.1 The EA understands LTC's approach with short culvert and agree that the short culvert is the 'least-worst' option.

5.2 They have concerns regarding the connectivity of the landscape in relation to flora and fauna impacts and the potential to cause a deterioration in WFD status (noting that the assessment should consider any measurable impact (regardless of the quality of the starting point)).

5.3 Improving the status of the water body would be an excellent aspiration to have and consider as an outcome.

Annex C.8 Coalhouse Point Mitigation Water Supply Structure (HE540039-LTC-EWE-S07-REP-ENV-00001)

Lower Thames Crossing

Coalhouse Point Mitigation Water Supply Structure

Document Number: HE540039-LTC-EWE-S07-REP-ENV-00001

Aims of the paper

- To confirm the assumed construction method for the installation of a self regulating tidal gate or equivalent structure at west of Coalhouse Point to secure a water supply for the HRA and ecology mitigation. Including:
 - Construction footprint
 - Operational footprint
 - Method of works
 - Timing of works
 - Design requirements
- Confirm Order Limit changes required for the additional structure

Introduction

LTC's proposed Habitats Regulations Assessment (HRA) and invertebrate mitigation at Coalhouse Point requires a secure water supply. Hydrology studies indicate there is insufficient water in the natural catchment to sustain the water demand. Plate 1 presents the location and indicative design of the proposed mitigation area in the context of the LTC alignment.

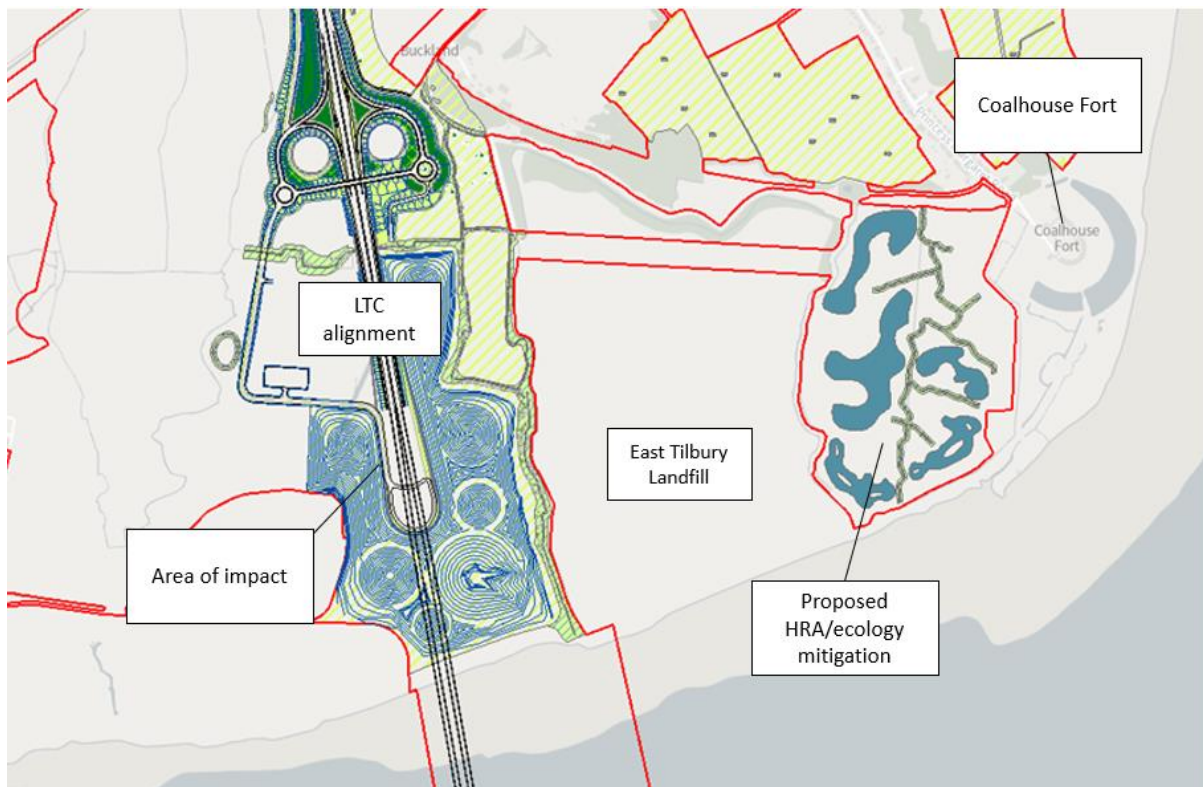


Plate 1: Proposed location of HRA and ecology mitigation

- The HRA and EIA require evidence that proposed mitigation is feasible. Natural England have advised that feasibility of the mitigation will need to be presented before they would be able to agree the sufficiency of the mitigation in the SoCG, which is a DCO acceptance risk and DCO consenting risk.

- A water supply solution is required by the HRA to demonstrate the feasibility of the measures in the DCO application, but also to inform engagement with Natural England in June/July 2022 so that the SoCG submitted at the application will have Natural England agreement on the conclusions of the HRA.
- Uncertainty on long-term condition and ownership of Coalhouse Point flood defences is an ongoing issue, however, does not influence the requirement of demonstrating the feasibility of a self regulating tidal gate or equivalent structure.

A choose by advantage workshop was carried out by the LTC Project team to achieve the following:

- Selection of preferred option/solution using Choosing by Advantage
- Identify next steps and risks
- Present update on a preferred option to DDG

The preferred option selected was to include provision for a structure to provide a direct supply from the River Thames within the DCO Order Limits and works plans. In parallel, the Project would seek to gain a legal agreement with Thurrock to supply water from the existing infrastructure within the Coalhouse Fort moat, however, this cannot be relied upon within the timescales required for the HRA consultation or DCO submission.

A review of alternative sites for the HRA and ecology mitigation has been carried out. No alternatives were identified.

The commitments in the HRA to include this structure reads:

HR010 – The habitat creation at the land adjacent to Coalhouse Point, indicated on the Environmental Masterplan (Figure 2.4, Application Document 6.2) and described in Clause S9.13 of the Design Principles (Application Document 7.5) will be carried out prior to the commencement of works at the Northern tunnel entrance compound. The water required to maintain a range of depths within the habitat consistent with the guidance in “Manage lowland wet grassland for birds” (DEFRA 2021) will be secured prior to completion of the habitat creation works and will, unless otherwise agreed with the Secretary of State, be sourced from the River Thames via a self-regulating tide gate or equivalent structure, passable by eels, constructed (in accordance with HR011) in the sea wall, at approximately TQ686761, to allow regulated tidal exchange (Work No. [TBC]).

HR011 –Works to construct a self-regulating tide gate or equivalent structure (HR010 Option 2) would be undertaken with the following constraints:

- In line with best practice, the works to construct the self regulating tidal gate or equivalent structure should be programmed for April – August (to avoid disturbance to passage and overwintering birds associated with European designated sites) where this would not delay the completion of the habitat creation works at the earliest date.
- All works requiring access to the inter-tidal zone would be completed to suit tidal cycle and at periods of low water.
- All piling works would be completed during periods of low water to avoid transmission of underwater noise.
- All piling works would utilise soft start piling and other best practice techniques, as per the JNCC 2010 guidance (Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise), to help avoid noise and vibration impacts.
- Excavated arisings would be retained within the coffer dam or stored on a support barge.
- No tracking on the upper foreshore area would be carried out.

Change to the Order Limits

To include provision of a new structure within the existing flood defence at Coalhouse Point, an amendment to the Order Limits would be required.

The location of the proposed structure, noted on Plate 2, has been determined by the following constraints:

- 50m offset from the western buried high pressure gas pipeline that crosses beneath the River Thames and the flood defence before taking an easterly alignment towards the National Grid AGI.
- An area which minimises the temporary disturbance of intertidal / mudflat habitat between the flood defence and mean high water level.
- Maintaining a distance of 100m from the boundary of East Tilbury Landfill.

To allow for the construction of the new structure, a temporary working area of 50m (longitudinally to the flood defence) by 20m to 35m (extending into the Thames) would be required. This would allow sufficient space during construction. This is presented as the orange area in Plate 2. The construction works would result in the temporary loss of intertidal habitat, however, given the scale of the proposed works and the dynamic nature of the tidal regime, any loss would naturally re-establish within a short-term timescale.

Once operational, it is assumed that the footprint of the proposed structure would not extend beyond the existing footprint of the flood bund and therefore the Project would not result in any permanent loss of inter-tidal habitat.

It was proposed to amend the Order Limits to incorporate the existing flood defence that is currently owned by the landowner, Mr Mott. This change was proposed irrespective of the requirement of a structure and is shown as the red area in Plate 2. Given the new structure would be limited to the footprint of the flood defence, this change would also incorporate the new structure.

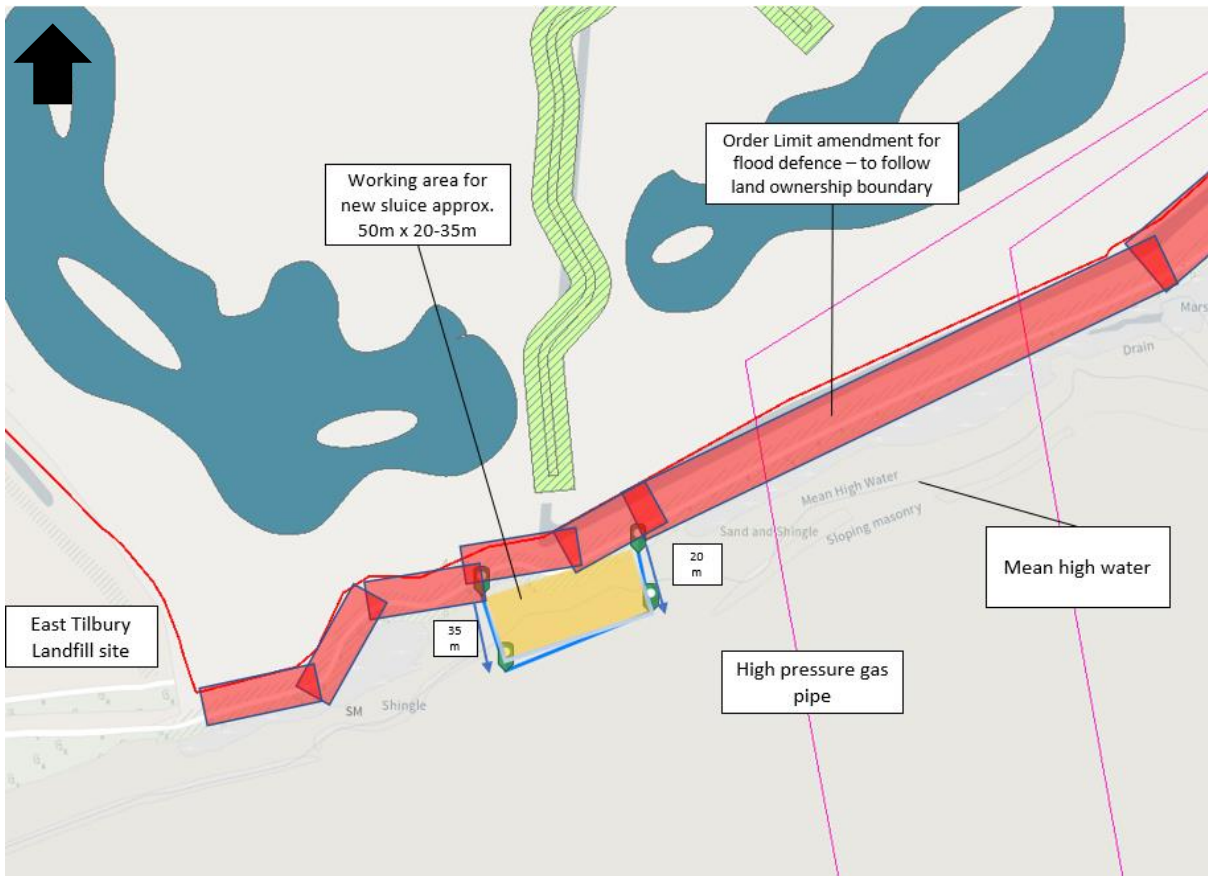


Plate 2: Proposed amendments to the DCO Order Limits to provide the 50mx20-35m working space for the construction of the sluice structure. Approximate amendments to Order Limits to incorporate flood defence also highlighted.

that the Thames' water level would be greater than 2.0m AoD for 24.75 hours over the three-day period. Assuming that a 600mm diameter pipe is installed, this would be sufficient to convey water through the flood defence to meet the required water demand of the proposed mitigation area and would avoid any permanent works within the inter-tidal area. Due to the elevated position of the structure within the flood defence and its relative position in terms of overall tidal frame, it has been assumed that the risk of the structure becoming silted up is low.

The final siting and form of the structure would be subject to detailed design.

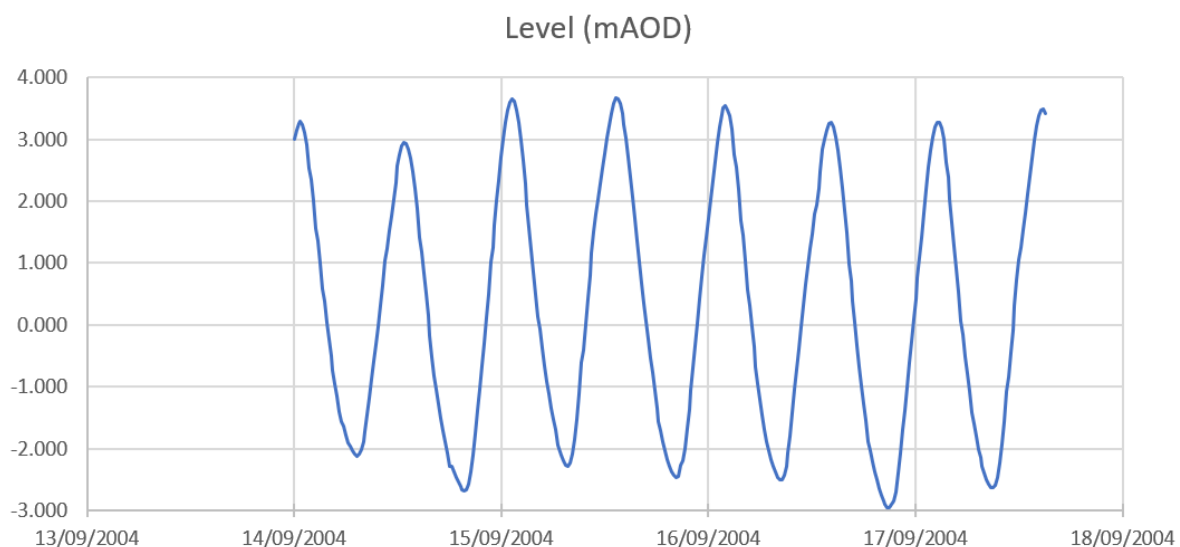


Plate 4: Mean high water spring tidal cycle at Coalhouse Point

To prevent unacceptable inundation of the land behind the flood defence, a mechanism would be required to control and/or stop water inflow once the mitigation features are filled to the required water level (HR010). Plate 5 illustrates a self-regulating tidal gate structure that has been used in similar situations and would likely be used on this proposal.



Plate 5 Self regulating tide gate at Seaton in Devon (Figure 3.6 in https://assets.publishing.service.gov.uk/media/6033a8f5e90e076607c1bf0e/Self-regulating_tide-gate_a_new_design_for_habitat_creation_technical_report.pdf)

Construction Method

The following sections describe the envisaged construction method required for the installation of the structure within the footprint of the existing flood defence. It is envisaged that in total construction would be up to 12 weeks in duration.

It is assumed that all works within the intertidal area would be restricted to periods of low water.

Construction and excavation of coffer dam

A sheet-piled coffer dam would be constructed to isolate the section of the flood defence in which the structure is to be installed. Isolation via the coffer dam allows the flood defence to be “breached” for the installation of the structure.

Piling works for the coffer dam would be undertaken from a dumb barge with spud legs or anchors on winches, with a 30 to 50 tonne 360 excavator and a multi cat that has a 5 tonne lifting capacity to set anchors as required.

The main piling barge may be serviced by a second dumb feeder barge carrying sheet piles. Alternatively, depending on the final siting of the sluice structure, servicing could be achieved via crane access from the landward side of the defence.

The short sheet piles would be vibro-piled into place (circa 6m “driven” in 4m below trench base) with small vibrating hammer (<https://www.omsvibro.com/products/vibratory-hammers/excavator-mounted/>). Sheet piling would be installed along either side of the proposed working area forming the coffer dam. Indicatively, the coffer dam would be approximately 10m x 15m, and would not extend beyond the maximum working area defined for the construction works. Excavation of the section of flood defence would take place within the coffer dam to the required depth.

Excavated arisings would be retained within the coffer dam or stored on a support barge or on land. Arisings would not be side cast within the inter-tidal area.

Assumed plant required for construction:

- Dumb barge/Jack up barge/pontoon
- Vibrating Hammer attachment on an excavator, or similar
- Crane – if servicing from land
- Excavator
- Multi Cat with lifting capacity
- Supply barge (for sheetpiles)

Installation of structure

The proposed structure selected to convey the water flow would be installed in the location of the flood defence “breach”. Due to uncertainty over ground conditions, this may require additional foundation works and therefore piling has been assumed.

Assumed plant required for construction:

- Dumb barge/Jack up barge/pontoon
- Mini piling rig – on the barge
- Supply barge for precast piles and other materials
- Crane
- Excavator
- Compressor and small tools

Reinstatement

Following the installation of the structure the flood defence would be reinstated / back filled to maintain continuity of the defence around the new structure and maintain the existing public right of way. The sheet piled coffer dam would be removed and any areas excavated back filled as required.

Assumed plant required for construction:

- Dumb barge/Jack up barge/pontoon
- Supply barge
- Excavator
- Multi Cat with lifting capacity

Decommissioning

It is assumed that the structure would be permanent, due to its role in supporting HRA and ecology mitigation. Therefore, decommissioning of the asset would not be assessed.

Secondary Consents and Stakeholder Engagement

Secondary consents

- Deemed Marine Licence
- Preliminary Navigational risk assessment
- River works licence
- Abstraction licence
- Flood Risk Activity Permit

Stakeholders

- Port of London Authority
- Environment Agency
- Marine Management Organisation
- Thurrock Council (as other flood defence owner)
- Natural England
- National Highways
- Landowner

Annex C.9 Flood Risk Assessment – Climate Change (HE540039-CJV- EFR-TNT-ENV-00011)

Lower Thames Crossing

Flood Risk Assessment

Climate Change

**** THIS SECTION IS TO BE REMOVED FROM FINAL VERSION OF THE DOCUMENT****

Document control

Document no	HE540039-CJV- EFR-TNT-ENV-00011
Author	Ian Ford
Owner	Highways
Distribution	Highways and EA
Document Status	Draft

Revision history

Version	Date	Description	Author
1	22/04/20	1 st Draft	Ian Ford

Reviewer list

Name	Role
Robert Bird	Flood Risk Team

Approvals

Name	Signature	Title	Date	Version
Philip Paterson		Highways Lead	21/04/2020	1.0

Lower Thames Crossing

Flood Risk Assessment

List of contents

	Page number
1 Introduction	2
2 General	3
3 Peak Rainfall Intensity Allowance.....	4
4 Peak River Flow Allowances	5
5 Sea Level Rise Allowances.....	6

List of tables

	Page number
Table 3-A: Peak rainfall intensity allowance in small and urban catchments (using 1961 to 1990 baseline)	4
Table 4-A: Peak river flow allowances for Thames river basin district	5
Table 4-B: Peak river flow allowances by flood risk vulnerability and the flood zone	5
Table 5-A: Flood risk assessment sea level allowance for each epoch in mm per year, with total sea level rise for each epoch in brackets (use 1981 to 2000 baseline).....	6
Table 5-B: Comparison of the LTC interim sea level rise allowances with the EA guidance (relative to the 2017 base year of the CFB2018 dataset applied).....	6
Table 5-C: H++ sea level allowance for each epoch per year with cumulative sea level rise for each epoch in brackets (use 1990 baseline)	7

1 Introduction

- 1.1.1 Climate change has the potential to increase peak rainfall intensity with a corresponding increase in the rate and volume of runoff being discharged to local watercourses and subsequently create an escalation in flood risk. Furthermore, sea levels are also projected to increase as a result of climate change.
- 1.1.2 This Technical note sets out the approach that Lower Thames Crossing is taking with respect to climate change for the Flood risk Assessment.

2 General

- 2.1.1 Outputs of the current UK Climate Projections (UKCP18) were published in November 2018 through a web-based user interface, providing climate projections for user-selected locations. The current Environment Agency (EA) guidance on climate change allowances for flood risk assessments¹ was updated in December 2019 to apply UKCP18 sea level rise allowances (and further amended in March 2020 with a minor clarification – i.e. the allowances did not change). Other allowances, including peak rainfall and river flow allowances, were not updated and remain unchanged since before the UKCP18 projections were published.
- 2.1.2 Lower Thames Crossing will become operational in 2027 and the operational life is up to 2127. The impacts of climate change are therefore assessed up to 2127. The EA's guidance on climate change allowances provides uplifts for rainfall and flow for the period covering 2015 to 2115, and sea level rise for the period covering 2000 to 2125.
- 2.1.3 In the absence of climate change allowances for 2127, the EA's climate change uplifts to rainfall and flow for 2115 will be adopted for the purposes of this assessment. This approach is consistent with the Environment Agency's climate change guidance for appraisal of flood defence schemes². Sea level rise beyond 2125 will be extrapolated by assuming the same rate of rise (mm/year) as specified for 2125 continues beyond 2125.
- 2.1.4 The scheme design and assessment will apply the climate change allowances specified in the EA's guidance. In addition, sensitivity testing will be undertaken to consider the potential impacts on the scheme of the H++ climate change scenario. H++ climate change assessment allowances are provided in the Environment Agency's climate change guidance for appraisal of flood defence schemes.

¹ Environment Agency, *Flood risk assessments: climate change allowances*, December 2019. ([web link](#))

² Environment Agency, *Adapting to Climate Change: Advice for Flood and Coastal Erosion Risk Management Authorities*, 2016. ([web link](#))

3 Peak Rainfall Intensity Allowance

3.1.1 Table 3-A shows anticipated changes in extreme rainfall intensity in small and urban catchments, as detailed in the EA's guidance on climate change allowances.

Table 3-A: Peak rainfall intensity allowance in small and urban catchments (using 1961 to 1990 baseline)

Applies across all of England	Total potential change anticipated		
	2015 to 2039	2040 to 2069	2070 to 2115
Upper end	10%	20%	40%
Central	5%	10%	20%

3.1.2 For flood risk assessments, the EA guidance states that:

- *For flood risk assessments and strategic flood risk assessments, assess both the central and upper end allowances to understand the range of impact.*
- *Design your drainage system to make sure there is no increase in the rate of runoff discharged from the site for the upper end allowance.*
- *Where on-site flooding for the upper end allowance presents a significant flood hazard (for example, depths and velocities of surface water runoff cause a significant danger to people), you will need to take further mitigation measures to protect people and property (for example, raising finished floor levels). As a minimum, there should be no significant flood hazard to people from on-site flooding for the central allowance.*

3.1.3 As the highway is considered to be Essential Infrastructure and has a protracted operational life, the upper end and central rainfall intensity allowances of 40% and 20% respectively shall be used for the purposes of the FRA.

3.1.4 There are no rainfall allowances specified for the H++ scenario.

4 Peak River Flow Allowances

- 4.1.1 Peak river flow allowances for climate change are based on river basin districts. The development falls within the Thames River Basin District³. The peak river flow allowances for the Thames River Basin District are presented in Table 4-A.

Table 4-A: Peak river flow allowances for Thames river basin district

Allowance category	Total potential change anticipated		
	2015 to 2039	2040 to 2069	2070 to 2115
Upper end	25%	35%	70%
Higher central	15%	25%	35%
Central	10%	15%	25%

Note: Allowances are for 1961 to 1990 baseline flows

- 4.1.2 The application of the allowance category is a function of flood risk vulnerability classification for the type of development and the flood zone. A matrix of allowances for peak river flows is presented in Table 4-B.

Table 4-B: Peak river flow allowances by flood risk vulnerability and the flood zone

Flood risk vulnerability classification		Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Flood zone (s)	Zone 2	Upper end	Higher central Upper end	Higher central Upper end	Central Higher Central	Central
	Zone 3a	Upper end	Development should not be permitted	Higher central Upper end	Central Higher Central	Central
	Zone 3b	Upper end	Development should not be permitted	Development should not be permitted	Development should not be permitted	Central

- 4.1.3 As the highway is considered to be Essential Infrastructure and will have a protracted operational life, peak river flow allowances of 70% shall be used for the purposes of the FRA.
- 4.1.4 The H++ scenario flow uplifts for the Thames River Basin District is 80% for the 2080s (2070-2115). This uplift will be simulated as a sensitive test to consider the potential impact of the H++ climate change scenario on the scheme.

³ Environment Agency, *River basin district map*, 2015

5 Sea Level Rise Allowances

5.1.1 The EA guidance specifies sea level rise allowances to be applied in flood risk assessments. These allowances are reproduced in Table 5-A.

Table 5-A: Flood risk assessment sea level allowance for each epoch in mm per year, with total sea level rise for each epoch in brackets (use 1981 to 2000 baseline)

Area of England	Allowance	2000 to 2035 (mm)	2036 to 2065 (mm)	2066 to 2095 (mm)	2096 to 2125 (mm)	Cumulative rise 2000 to 2125 (metres)	Cumulative rise 2000 to 2127 (extrapolated beyond 2125) (metres)
South east, Thames	Higher Central	5.7 (200)	8.7 (261)	11.6 (348)	13.1 (393)	1.20	1.23
	Upper end	6.9 (242)	11.3 (339)	15.8 (474)	18.2 (546)	1.60	1.64

5.1.2 The EA guidance specifies:

- *For flood risk assessments and strategic flood risk assessments, assess both the central and upper end allowances to understand the range of impact.*

5.1.3 Where the LTC assessment has applied higher central allowances, these are taken directly from the EA guidance (Table 5-A).

5.1.4 Where the LTC assessment has applied upper end allowances, these are consistent with the EA guidance upper end allowances, as follows:

- After the UKCP18 projections were published in November 2018, and prior to the updated EA guidance being published in December 2019, the Project applied interim sea level rise allowances as advised by the EA. These interim sea level allowances were those of the UKCP18 RCP 8.5 climate change scenario, extrapolated beyond 2100 to 2127 by applying the 2100 rate of sea level rise for the period beyond 2100. These interim sea level rise allowances are essentially the same as the EA guidance upper end allowances, as shown in **Error! Reference source not found.** Table 5-B, which compares the sea level rise allowances that were applied to the EA's Coastal Flood Boundary 2018 (CFB2018) extreme water level dataset (base year 2017) to those derived applying the EA guidance (relative to the 2017 base year). The allowances are identical for 2027, and the LTC interim allowances applied are 3.4mm higher for 2127 than the EA guidance upper end allowances.

Table 5-B: Comparison of the LTC interim sea level rise allowances with the EA guidance (relative to the 2017 base year of the CFB2018 dataset applied)

Allowance	Sea level rise allowance (mm)	
	2017 to 2027	2017 to 2127
LTC allowances (UKCP18 - RCP 8.5)	69	1523.0

Allowance	Sea level rise allowance (mm)	
	2017 to 2027	2017 to 2127
EA guidance: South east - upper end	69	1519.6
Difference (LTC allowance – EA guidance)	0	3.4

- 5.1.5 As the LTC allowances applied are consistent with the EA guidance (the 3.4mm higher allowance applied for 2127 in the LTC assessment is considered insignificant), the LTC climate change assessment applying the interim sea level rise allowances was not re-worked to apply the EA guidance values published in December 2019.
- 5.1.6 The H++ Sea Level Rise allowances are listed in Table 5-C.
- 5.1.7 The LTC will be designed to the climate change allowances specified for the project (i.e. consistent with EA guidance upper end sea level rise allowances).
- 5.1.8 Due to the nature of the road design, it will not be adaptable to the higher H++ climate change scenario, and the road could be inundated for the H++ design event. This will be assessed from consideration of the amount of additional sea level rise under the H++ rather than by hydraulic modelling. The LTC project does not propose simulating the H++ scenario by hydraulic modelling as available estuary water level time series are not available from the Environment Agency's TE2100 modelling.

Table 5-C: H++ sea level allowance for each epoch per year with cumulative sea level rise for each epoch in brackets (use 1990 baseline)

Area of England	1990 to 2025	2026 to 2050	2051 to 2080	2081 to 2115	Cumulative rise 1990 to 2115	Cumulative rise 1990 to 2120 (extrapolated beyond 2115)	Cumulative rise 1990 to 2127 (extrapolated beyond 2115)
East, east midlands, London, south east	6 mm/yr (210 mm)	12.5 mm/yr (312.5 mm)	24 mm/yr (720 mm)	33 mm/yr (1155 mm)	2.40 m	2.56 m	2.79 m

Annex C.10 Flood Risk Assessment – Future Thames Barrier Breach Modelling (HE540039-CJV-EFR-GEN-TNT- ENV-00101)

Lower Thames Crossing

Flood Risk Assessment

Breach modelling: Considering TE2100 future barrier options

**** THIS SECTION IS TO BE REMOVED FROM FINAL VERSION OF THE DOCUMENT ******Document control**

Document no	HE540039-CJV-EFR-GEN-TNT-ENV-00101
Author	Robert Bird
Owner	Highways
Distribution	EA
Document Status	Draft

Revision history

Version	Date	Description	Author
1	01/02/2021	1 st Draft	Robert Bird

Reviewer list

Name	Role
Ian Ford	Flood Risk Team
Michael Wilson	EIA Coordinator
Lisa Driscoll	LTC Road Drainage and Water Environment Lead

Approvals

Name	Signature	Title	Date	Version

Lower Thames Crossing Flood Risk Assessment

List of contents

	Page number
1 Introduction	2
1.1 Background.....	2
1.2 Potential for TE2100 future barrier options to influence the LTC FRA breach assessment	3
2 Assessment of TE2100 future barrier options.....	4
2.1 Comparison of EWLs for TE2100 future barrier options with those applied in LTC FRA breach modelling.....	4
2.2 Comparison of flood defence levels for TE2100 future barrier options with those applied in LTC FRA breach modelling.....	7
3 Conclusions	12

1 Introduction

1.1 Background

- 1.1.1 The Lower Thames Crossing (LTC) breach assessment, undertaken to inform the LTC Flood Risk Assessment (FRA), includes breach simulations for the present day (2027) and future (2127) for return periods 200 years (0.5% AEP) and 1000 years (0.1% AEP). Breaches were simulated at the following TE2100 model nodes:
- 3.15 (Mardyke Sluice breach location)
 - 3.26 (TIL005 breach location)
 - 3.28 (TIL006 breach location)
- 1.1.2 Further details of the breach modelling undertaken are in Part 5 of the LTC FRA, Appendix F (Application Document 6.3).
- 1.1.3 The LTC FRA breach simulations did not consider the future Thames barrier options, as set out in the TE2100 plan (TE2100 Phase 3 Topic 1.5 Set 2 Estuary Wide Options - Hydraulic Modelling, Environment Agency (December 2008) and TE2100: Design Water Levels and Future Defence Crest Levels, Environment Agency, (May 2015)). Following consultation with the Environment Agency, this technical note extends the LTC FRA breach assessment to also consider breaches assuming the following TE2100 future Thames barrier (and flood defences) options:
- Option 1.4 (barrier at Woolwich)
 - Option 3.2 (barrier at Long Reach)
 - Option 3.1 (barrier at Gravesend Reach)
- 1.1.4 The breach modelling undertaken to date for the LTC FRA assumes that during a simulated breach of the River Thames tidal defences, flood water is conveyed into the tidal floodplain only through the breach opening (i.e. no overflow of tidal flood defences), as the simulated Extreme Water Levels (EWLs) for all breaches simulated are below flood defence levels. This assumption remains valid when considering the TE2100 future Thames barrier Options 1.4, 3.2 and 3.1, as these options specify that the flood defence heights would be upgraded when required for each option to provide the required standard of service specified by the TE2100 plan (which is greater than or equal to 1000 years at the LTC breach locations, and so above the 1000 year return period EWL applied in the breach simulations).

1.2 Potential for TE2100 future barrier options to influence the LTC FRA breach assessment

1.2.1 Results of a simulated breach assuming the future barrier Options 1.4, 3.2 and 3.1 in 2127 may differ to results of the LTC FRA breach simulations already undertaken, since:

- Future barrier options may result in different River Thames design EWLs compared to those applied in the LTC FRA breach modelling.
- Future barrier options may specify different future tidal flood defence levels (in 2127) compared to those applied in the LTC FRA breach modelling. The LTC FRA breach simulations undertaken and the future barrier options both assume that the 1000 year return period River Thames EWLs in 2127 would be below the River Thames tidal flood defence levels in 2127 at the LTC FRA breach locations. However, the specification of simulated breach start and end times is influenced by flood defence heights (Breach of Defences Guidance, Environment Agency, 2018), and so a change in flood defence levels (in the barrier options) results in a change in specified breach start and end times.

2 Assessment of TE2100 future barrier options

2.1 Comparison of EWLs for TE2100 future barrier options with those applied in LTC FRA breach modelling

- 2.1.1 The LTC FRA breach modelling applied EWLs derived from TE2100 EWLs, adjusted to account for the more recent Environment Agency Coastal Flood Boundary dataset 2018 (CFB2018) and UKCP18 projected sea level rise allowances.
- 2.1.2 The TE2100 simulated EWLs for Option 1.4 (TE2100: Design Water Levels and Future Defence Crest Levels, Environment Agency (May 2015)) are the same as the TE2100 EWLs from which the LTC FRA breach modelling EWLs were derived, as this option assumes no change to the tidal barrier location in the future.
- 2.1.3 The TE2100 simulated EWLs for TE2100 Options 3.2 and 3.1 differ from those of Option 1.4 as Options 3.2 and 3.1 represent a change in tidal flood barrier location (with future barriers at Long Reach and Gravesend Reach respectively).
- 2.1.4 Table 1 compares EWLs applied in the LTC FRA breach modelling (including the TE2100 EWLs provided by the Environment Agency and adjusted values accounting for CFB2018 and UKCP18) with those simulated for the TE2100 Options 1.4, 3.2 and 3.1, at LTC breach locations Mardyke Sluice, TIL005 and TIL006.
- 2.1.5 A comparison of EWLs applied in the LTC FRA with those simulated for the TE2100 Options 1.4, 3.2 and 3.1 should be based on the TE2100 EWLs provided for use in the LTC FRA rather than the adjusted EWLs. This provides a “like-for-like” comparison, as all values compared are then based on the TE2100 modelling and boundary conditions.

Table 1: Mardyke Sluice: EWLs applied in the LTC FRA breach modelling and EWLs simulated for the TE2100 Options 1.4, 3,2 and 3.1

1000 year (0.1% AEP) Extreme Water level values (mAOD)					
Year	TE2100 EWLs provided for LTC FRA	*Applied in LTC breach modelling	¹ TE2100 Option 1.4	² TE2100 Option 3.2	³ TE2100 Option 3.1
TE2100 model node 3.15 (Mardyke Sluice breach location)					
2120	6.85		6.85		
2127	6.92**	7.06			
2140	7.04**			5.40	5.40
2170	7.33		7.33	5.40	5.40
TE2100 model node 3.26 (TIL005 breach location)					
2120	6.65		6.65		
2127	6.73**	6.87			
2140	6.87**			6.88	5.18
2170	7.19		7.19	7.24	5.18
TE2100 model node 3.28 (TIL006 breach location)					
2120	6.56		6.56		
2127	6.65**	6.82			
2140	6.80**			6.83	6.61
2170	7.17		7.17	7.21	7.06

* The LTC EWLs adjust TE2100 values according to the latest Environment Agency Coastal Flood Boundary dataset 2018 and UKCP18 sea level rise values. Full details of this adjustment are in the LTC FRA breach modelling appendix (FRA Part 5).

** Interpolated values to aid comparison with values applied in the LTC breach modelling and other TE2100 options
1 – Source: Table A.5 in TE2100: Design Water Levels and Future Defence Crest Levels, Environment Agency (May 2015)

2 – Source: TE2100 Phase 3 Topic 1.5 Set 2 Estuary Wide Options - Hydraulic Modelling, Environment Agency (December 2008). 2140 EWLs taken from Table 4.8, 2170 EWLs taken from Table 4.10

3 – Source: TE2100 Phase 3 Topic 1.5 Set 2 Estuary Wide Options - Hydraulic Modelling, Environment Agency (December 2008). 2140 EWLs taken from Table 4.7, 2170 EWLs taken from Table 4.9

2.1.6 Table 1 indicates:

- Option 1.4 EWLs are the same as the TE2100 EWLs provided for use in the LTC FRA breach modelling at all LTC FRA breach locations.
- Option 3.2 EWLs are;
 - lower than the TE2100 EWLs provided for use in the LTC FRA breach modelling at the Mardyke Sluice breach location.
 - slightly higher than the TE2100 EWLs provided for use in the LTC FRA breach modelling at TIL005 and TIL006 breach locations by approximately 0.01m and 0.03m respectively (based on values for 2140, highlighted orange in Table 1).
- Option 3.1 EWLs are lower than the TE2100 EWLs provided for use in the LTC FRA breach modelling at all LTC FRA breach locations.

2.1.7 In summary, the EWLs presented in Table 1 indicate the TE2100 future barrier Options 1.4, 3.2 and 3.1 would not result in a significant increase in EWLs at the LTC FRA breach locations in 2127, with increases only for Option 3.2 by up to 0.03m (based on values for 2140).

2.1.8 An increase in EWLs by up to 0.03m is considered insignificant compared to other assumptions and uncertainties in assessing breach impacts in 2127. Other assumptions and uncertainties include:

- The CFB2018 stated 2.5% and 97.5% confidence intervals in the 1000 year return period EWL at Southend in the CFB2018 base year (2017) are - 0.49m and +0.60m respectively (and these confidence intervals only account for statistical uncertainty).
- There is significant uncertainty in estimating future sea level rise due to climate change.
- There is uncertainty in the TE2100 hydraulic modelling.
- The breach modelling guidance applies assumptions (e.g. breach width, start time and duration) which may or may not be representative of an actual breach, should one occur in the future.
- There is uncertainty in the hydraulic modelling of breach propagation inland.

2.1.9 The increase in EWLs by up to 0.03m is therefore considered insignificant in the context of the wider assumptions and uncertainties in assessing breach impacts in 2127, and, with respect to the EWLs applied, the LTC FRA breach simulations results are considered an appropriate assessment of future breach flood risk i.e. the LTC FRA assessment of the impact of the LTC Project on breach flood risk elsewhere, and the impact of a breach on the LTC Project, is considered robust in this regard.

2.2 Comparison of flood defence levels for TE2100 future barrier options with those applied in LTC FRA breach modelling

2.2.1 The EA breach simulation guidance specifies a simulated breach start time to be when flood levels reach $\frac{3}{4}$ of the flood defence height. For a given EWL, a change in flood defence levels at a simulated breach location therefore has potential to impact on the simulated breach impacts. The TE2100 future Options 1.4, 3.2 and 3.1 require changes in flood defence levels at the LTC FRA breach locations, as detailed in Table 2 which lists:

- Existing flood defence levels at the LTC FRA breach locations as applied in the LTC breach modelling and as reported in TE2100 reports (report references are in Table 2).
- Required future flood defence levels for the TE2100 Options 1.4, 3.2 and 3.1 at the LTC FRA breach locations, as reported in TE2100 reports (report references are in Table 2).

Table 2: Existing and future flood defence levels at LTC FRA simulated breach locations

LTC FRA breach location	TE2100 model node	LTC FRA breach modelling assumed defence level (mAOD)	Existing defence level (according to TE2100 reporting) (mAOD)	Required future defence level in 2127 (mAOD)		
				Option 1.4	Option 3.2	Option 3.1
Mardyke Sluice	3.15	7.16 ¹	7.05 ⁴	8.10 ⁴	6.10 ⁴	6.90 ⁵
TIL005	3.26	6.48 ²	6.65 ⁴	7.90 ⁴	8.00 ⁴	6.63 ⁵
TIL006	3.28	4.99 ³	7.00 ⁴	7.00 ⁴	7.00 ⁴	6.63 ⁵

1 – Source: Lower Thames Crossing channel topographic survey, undertaken for this study – Storm Geomatics (November/December 2018)

2 – Source: Information received from Environment Agency for Asset Number 152988 (Datasheet reference EAN/2018/76391, 2018)

3 – Source: Environment Agency Bowaters Sluice “as built” drawing

4 – Source: Table 7.1 in TE2100: Design Water Levels and Future Defence Crest Levels, Environment Agency (May 2015)

5 – Source: Table 4.9 in TE2100 Phase 3 Topic 1.5 Set 2 Estuary Wide Options - Hydraulic Modelling, Environment Agency (December 2008)

- 2.2.2 Where Table 2 indicates a required future flood defence level is lower than the existing flood defence level:
- It is assumed the level of the existing flood defence would not actually be lowered in the future.
 - The requirement for a lower flood defence level arises from a lower design EWL (for that future barrier option and location) than the equivalent TE2100 EWL provided for use in the LTC FRA. The simulated impacts of a breach for these options would therefore be lower than the LTC FRA simulations.
- 2.2.3 Therefore only the future barrier options with increased EWLs compared to the TE2100 EWLs provided for use in the LTC FRA, and/or increased flood defence levels if required, have potential to result in increased simulated breach impacts. As discussed earlier, the impact of increased EWLs by up to 0.03m is considered insignificant, and so the following considers the influence on simulated breach events of increasing flood defence levels.
- 2.2.4 Figures 1 to 3 show the influence of increasing flood defence levels on breach start and end times for the LTC FRA breach simulations. The change in breach start and end times is shown for the highest required future defence levels (i.e. the future defence levels that are most different to those assumed in the LTC FRA breach simulations, highlighted in orange in Table 2).

Figure 1: Impact of increased defence levels on breach start and end times at Mardyke Sluice breach (based on future level for Option 1.4 in 2127)

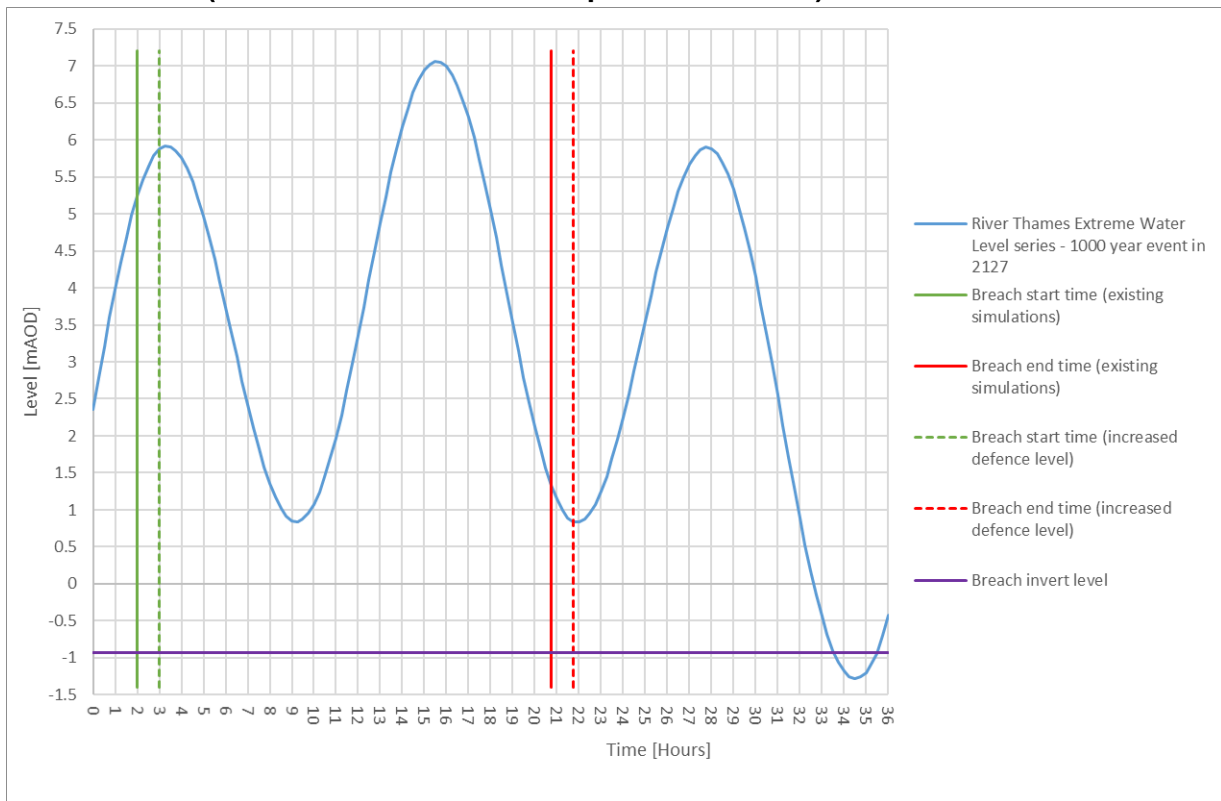


Figure 2: Impact of increased defence levels on breach start and end times at TIL005 breach (based on future level for Option 3.2 in 2127)

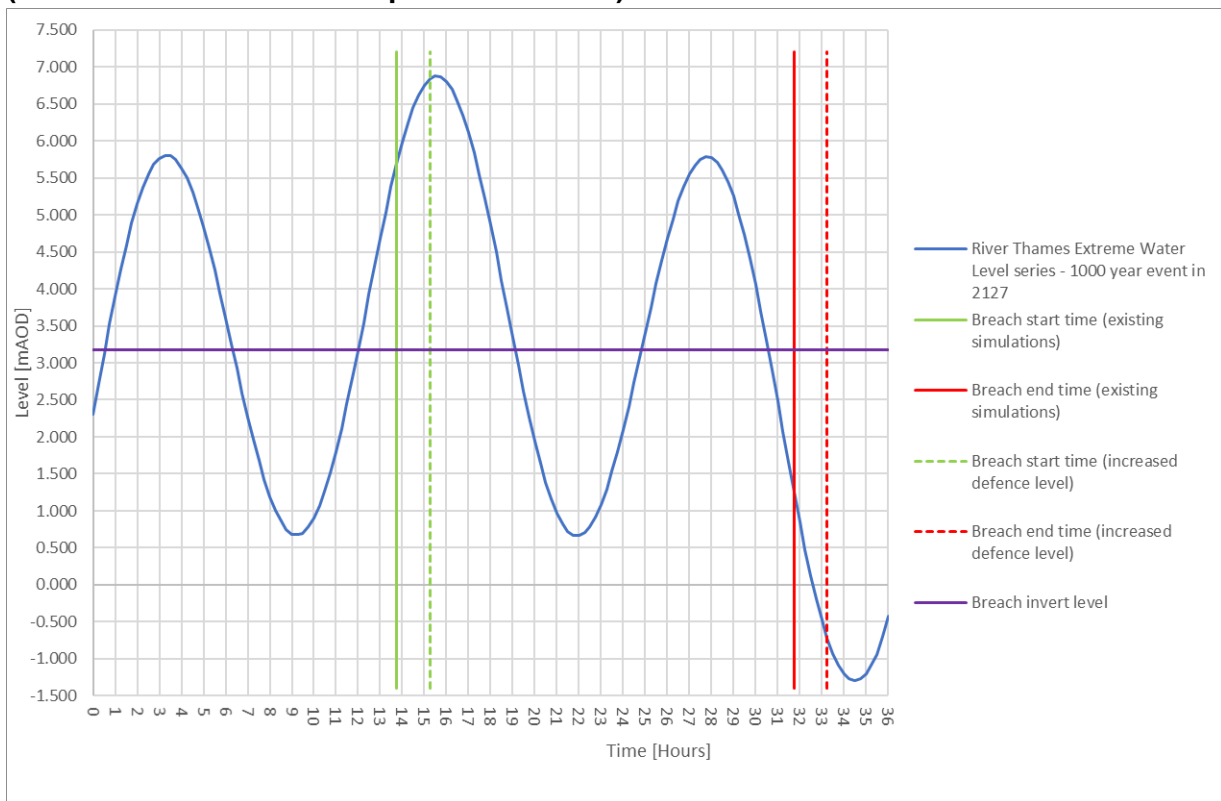
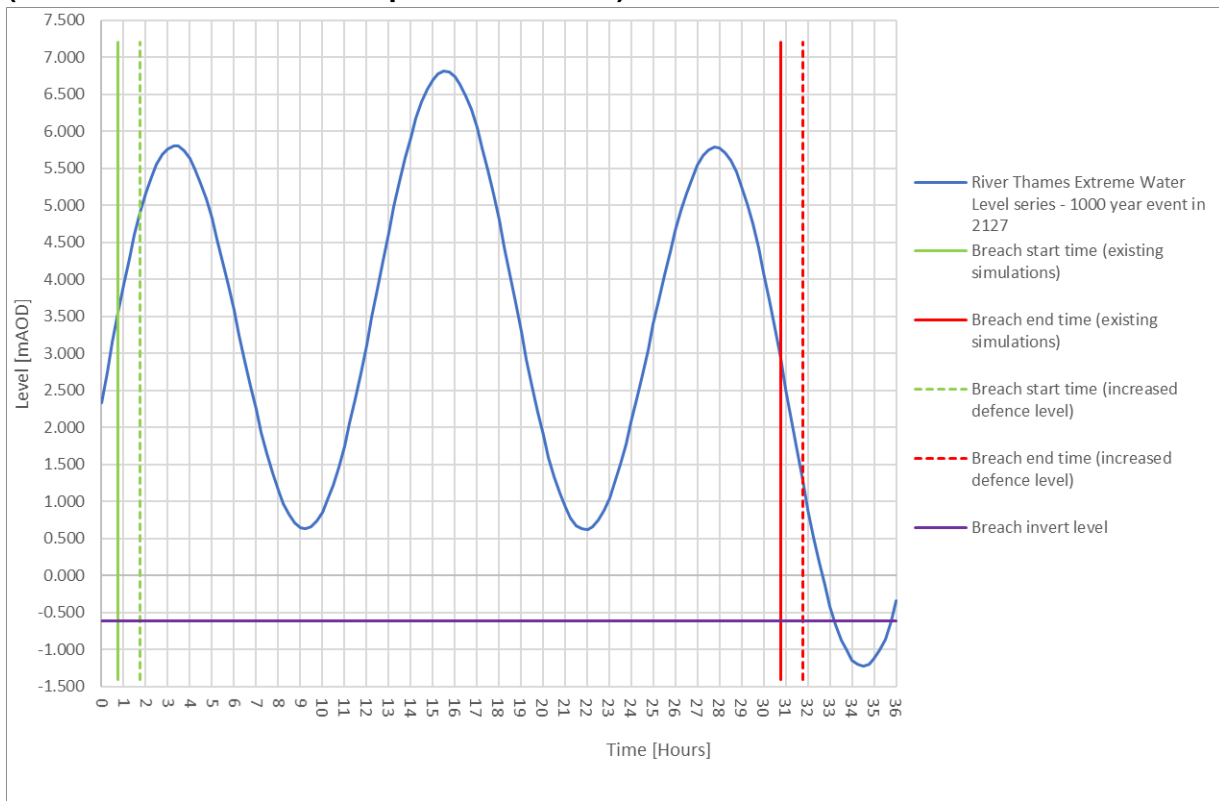


Figure 3: Impact of increased defence levels on breach start and end times at TIL006 breach (based on future level for Option 3.2 in 2127)



2.2.5 Figures 1 to 3 show that for all LTC FRA breach locations, applying higher flood defence levels results in a delay in the start and end times of simulated breaches. An inspection of Figures 1 to 3 indicates that the reduction in initial breach flows resulting from increased defence levels (due to a delayed start) would exceed the gain in breach flows at the end of the simulated breach event, as River Thames flood levels are higher at the start of simulated breach events than at the end of the events (and for TIL005 there would be no gain in breach flows at the end of the simulated breach event, as River Thames levels would be below the TIL005 breach invert level at the end of the simulated beach). There would therefore be an overall reduction in simulated breach flood volume as a result of increasing flood defence levels.

2.2.6 The LTC FRA breach simulation results show the nearest parts of the LTC Project within TIL005 and TIL006 breach event flood extents are approximately 2km and 0.8km respectively from the breach locations, with simulated peak velocities significantly lower than at the breach locations. The influence of an increase in flood defence levels on breach impacts at the LTC Project would therefore be dominated by total breach volume (i.e. breach flood extent and level).

2.2.7 Simulating increased flood defence levels would therefore be expected to reduce breach event peak flood levels and extents slightly in the vicinity of the LTC Project (and a breach of Mardyke Sluice would remain in-channel at the LTC Project location, as is the case for the breach simulations undertaken for the LTC FRA), such that the LTC FRA breach simulations already undertaken portray a slightly more conservative case in the future (2127) than the alternative future barrier options.

- 2.2.8 The slight reduction in breach flood volumes as a result of increased flood defence levels is considered insignificant in the context of the wider assumptions and uncertainties in assessing breach impacts in 2127 listed in paragraph 2.1.8. The LTC FRA breach simulations results are therefore considered an appropriate assessment of future breach flood risk i.e. the LTC FRA assessment of the impact of the LTC Project on breach flood risk elsewhere, and the impact of a breach on the LTC Project, is considered robust in this regard.

3 Conclusions

3.1.1 This technical note:

- Extends the LTC breach assessment to also consider breaches assuming the following TE2100 future Thames barrier (and flood defences) options:
 - Option 1.4 (barrier at Woolwich)
 - Option 3.2 (barrier at Long Reach)
 - Option 3.1 (barrier at Gravesend Reach)
- Considers the potential for changes in River Thames EWLs and required flood defence levels in the future, as a result of implementing any of the future barrier Options 1.4, 3.2 and 3.1, to influence future breach flood risk.
- Concludes that the LTC FRA breach simulation results provide an appropriate assessment of future breach flood risk i.e. the LTC FRA assessment of the impact of the LTC Project on breach flood risk elsewhere, and the impact of a breach on the LTC Project, is considered robust. Therefore no further breach simulations are required to account for TE2100 future barrier options 1.4, 3.2 and 3.1.

Annex C.11 Bowaters Sluice and East Tilbury Tidal Wall Monitoring Assessment (HE540039-LTC-GEN- GEN-TNT-TPI-00001)



Lower Thames Crossing

Bowater Sluice and East Tilbury Tidal Wall
monitoring assessment

Technical Note

Document Number: HE540039-LTC-GEN-GEN-TNT-TPI-00001

<Confidential>



Revision	Production Date	Prepared by	Checked by	Approved for release by	Sections revised
1.0	02/December/2021	Andres Rodriguez	Lewis Gocool	Andres Rodriguez	First Issue

This document has been prepared for Highways England in accordance with the terms and conditions of appointment defined in the Lower Thames Crossing (LTC) Technical Partner Contract. LTC cannot accept any responsibility for any use of or reliance on the contents of this document by any third party.

Contents

Contents	3
1. Executive Summary	4
2. Location of the assets	5
3. Description	6
4. Discussion	9
5. Conclusions	14
6. Recommendations	15
7. References	16
8. Appendix 1. East Tilbury Tidal Wall and Star Dam plans.....	17

1. Executive Summary

The purpose of this Technical Note is twofold:

- To provide an overview of the main factors that govern the behaviour of the area around Bowater Sluice and the East Tilbury Tidal Wall.
- To express the constraints for a successful monitoring program of the assets prior to the construction of the Lower Thames Crossing main tunnels (Baseline).

This Technical Note is based on limited information and its result could be reassessed when more information becomes available. The assessment has been carried out based on information provided by the Environment Agency (owner of the asset), and two site visits on 14th March 2019 and 30th September 2021.

2. Location of the assets

Bowater Sluice and East Tilbury tidal wall are located in the North bank of Thames river, Essex, approximately 1600m Southwest of Coalhouse Fort and 2800m East of Tilbury Fort.

In respect to the LTC scheme, the area is approximately 300 metres East of the Main Tunnels, according to DR3.0. See Figure 1 for reference.



Figure 1

3. Description

There are two independent but related assets in the area, Bowater Sluice and the East Tilbury tidal wall, directly above the first.

Bowater Sluice

Bowater Sluice is an asset designed to prevent the entrance of water from the Thames river and the tide to the canal behind it. The structure is thought to be constructed in the decade of 1960. It has a bore of pipe estimated in 18 or 24 inches. It is constructed with engineering brick and concrete capping slab. The asset is thought to have been constructed around 1960.

The brickwork is in poor condition showing signs of displacement and cracking. The reason behind this is not known. The condition of the internal pipework is not known either.

East Tilbury Tidal Wall

The East Tilbury Tidal Wall is an asset constructed after or during 1976 or 1979, as the only documents related to it provided by the EA are from these years (See Appendix 1). The purpose of the asset seems to be related to protect the sluice under it from erosion.

The asset is an L-shaped cantilever retaining wall made of reinforced concrete and divided in nine independent sections. Sealed expansion joints run between the different sections. Some of the joints are in poor condition.

The asset is covered in graffiti and its concrete seems to be in good state, with no apparent cracking or spalling in any section. Nevertheless, there are mild signs of displacement between these sections, mainly at both ends of the structure. The middle sections don't seem to be suffering any displacement. There is some cracking present at the edge of one of the sections (Figure 2), probably caused by said displacement.

There is actually an active erosional area West of the asset, which is related to the existing local water circulation. The asset is protected by a slabbed area to protect the structure from erosion, which has been already affected as seen in figures 3 and 4. There's no evidence of erosion in the immediate area East of the wall.

The soil above high tide level surrounding these two assets seems to be made ground.



Figure 2



Figure 3



Figure 4

4. Discussion

The eligibility criteria for Baseline I&M stated in document HE540039-CJV-GEN-GEN-REP-CLO-00008 – Baseline Instrumentation and Monitoring Report – have been followed to assess whether the assets are susceptible to be included in the current Baseline I&M scope.

Both assets lie beyond the zone of influence of the works, as per documents HE540039-CJV-GEW-GEN-REP-TPI-00001 and HE540039-CJV-GEN-GEN-TNT-GEO-00100. They include the 1mm settlement contour, which is considered the zone of influence of the works (Zol).

Bowater Sluice

As stated before, there are signs of displacement and cracking in the brickwork. Although the reason behind this is not known, it is most likely that movement of the ground underneath has caused the damage over the years.

In earlier stages of the design of the alignment, the water discharge route from the North portal compound was designed to flow through Bowater Sluice. This could negatively impact the structural health of the asset.

To avoid it, Lower Thames Crossing devised a solution so this asset will not be affected by the works. A draft of this proposal is shown in document "North Portal Discharge Assumptions" (HE540039-CJV-EGN-S07-TNT-ENV-00002). Although this document has a BC number assigned, the document has not been published on BC as of December 2021.

Regarding the zone of influence of the works, it is not possible that this structure will be affected by the settlement produced by drilling the main tunnels, as it rests well beyond this boundary (approximately 250m away from the 1mm settlement contour).

East Tilbury Tidal Wall

The EA has expressed concerns about the stability of this asset in relation to the LTC works. As stated before, the asset lies approximately 250m away from the zone of influence of the Main Works.

Although the structure shows some displacement between its different sections, it is not known what is causing this movement. It is not known either whether these displacements are still active.

Mechanisms that can affect the stability of the assets

Hypothetically, the ways these assets can be affected by the LTC works are the following:

- Settlement by tunnelling.
- Accumulating or excavating a sizeable volume of earths near the structure, i.e., an embankment or a cutting.
- Local erosion-sedimentation dynamics in the estuary.

As mentioned above, document HE540039-CJV-GEN-GEN-TNT-GEO-00100 presents the Stage 1 ground movement assessment for the bored tunnels, the portals and the approach to the portals based on Design Release (DR) DR2.11, including the 1mm settlement contour.

The ZoI in the North bank area extends approximately 50 metres at each side of the tunnels. The assets object of discussion here are beyond this line, as they are approximately 300 meters away from the nearest of the tunnels.

Document HE540039-CJV-GEN-GEN-TNT-GEO-00223 analyses settlement on existing assets due to the main tunnels' boring, under Design Release 3.0.

As none of the assets were inside the zone of influence of the works, no settlement analysis was deemed necessary to be carried out.

Nevertheless, the Flood Defence Embankment, on the South bank, was assessed for expected displacements due to tunnelling. The settlement analysis on the South bank can be considered comparable to the expected displacements for the North bank as the method used (Attewell et al., 1986) does not take into account the geology of the area assessed.

According to this assessment, the maximum vertical displacement expected in the Flood Defence Embankment is near 70 mm over the crown of one of the tunnels and 60 mm over the second tunnel.

The induced settlement will modify the channel bed and the shoreline. Still, this amount of expected settlement is not deemed to generate a significant impact on the currents. Also, as the estuary has mobile sediments, on the event of any displacement the river bed and the sediment would just adapt to any small changes. In addition, the displacements are within typical modelling tolerances, especially in a large estuary with sediment load as the Thames's.

Notes on the morphology of the North bank and its shoreline.

A quick analysis of the aerial imagery of the zone reveals several erosional landforms in the shoreline of the North bank. The affected areas are shown in figures 5 and 6. A detail of the area of erosion near the assets was shown in figures 3 and 4. No erosional forms have been found in the opposite shoreline.



Figure 5

The two zones affected by erosion seem to be related to small headlands or raised areas found at the East of the eroded zones. It suggests that the governing currents are in direction East to West in this area and side of the river, which coincides with the general circulation pattern in estuaries given the influence exerted by Coriolis acceleration. The hypothesis is that these raised areas could disturb the currents and generate enough turbulence as to erode the shoreline in the locations indicated in figure 6.



Figure 6

Monitoring options

As shown in figure 3, the asset is covered in graffiti, and any part of it can be accessed easily by pedestrians. This ease of access implies that any monitoring instrument installed on the asset has a high chance of being vandalised at any moment, becoming useless after a short period of time, particularly in case of automated monitoring.

The only fully automatic monitoring option that could be of some help is satellite monitoring (InSAR), provided that:

- The asset has natural signal reflectors, as any reflector installed as part of the monitoring program could be vandalised.
- It would be needed a long baseline to understand the behaviour of the asset under different conditions, including tides, as a satellite produces an image of an area each 7 to 12 days, depending on the satellite.
- There is at least another on-site monitoring method supporting InSAR data, as the displacements of the asset could be complex to interpret due to tidal influence.

The most appropriate supporting methods will need on-site stable references, which would be difficult to produce given the influence of the tides in the area. Also, any manual monitoring method will have to match the satellite monitoring frequency for an easier interpretation of the data, which can be difficult to achieve.

5. Conclusions

- Three hypothetical mechanisms of action are deemed capable of de-stabilising the assets: settlement by tunnelling, accumulating or excavating earths and modifying the existing currents.
- The assets are too far from the zone of influence of the works as to be affected.
- No excavation or earth accumulation is planned near the assets.
- The East Tilbury Tidal Wall is thought to be affected by displacements at least on both ends of the asset.
- Further erosion in the West tip of the East Tilbury tidal wall area can be affecting the asset now or could do it in the future.
- It is not known whether this erosive process can explain all the displacements on the West tip of the wall.
- Origin of displacements on the East tip of the asset is not known.
- Bowater Sluice is not going to be affected by the LTC works.
- The effect of the modification of the shoreline and the river bed due to settlement is deemed not enough to generate visible effects on the erosion-sedimentation dynamics in the area.
- The governing local current in this area of the estuary is thought to be East to West, so any effects would become evident West of the main tunnels and not East, where the assets are placed.
- Any monitoring system installed on the asset must consider tidal effects and vandalism as a handicap to overcome, in order to achieve stable, accurate and trustworthy data during the life of the project to match the standards required throughout and beyond its execution.

6. Recommendations

- None of the assets assessed in this technical note are thought to be affected by the LTC Main Works, directly or indirectly, therefore they are not proposed for monitoring.
- Shall more information become available, the assets should be reassessed as indicated in document HE540039-CJV-GEN-GEN-REP-CLO-00008 – Baseline Instrumentation and Monitoring Report.
- In the event of these assets being monitored, any solution must consider the effect of tides on the area and the risk of any instrument being vandalised.

7. References

HE540039-CJV-GEN-GEN-REP-CLO-00008 – Baseline Instrumentation and Monitoring Report.

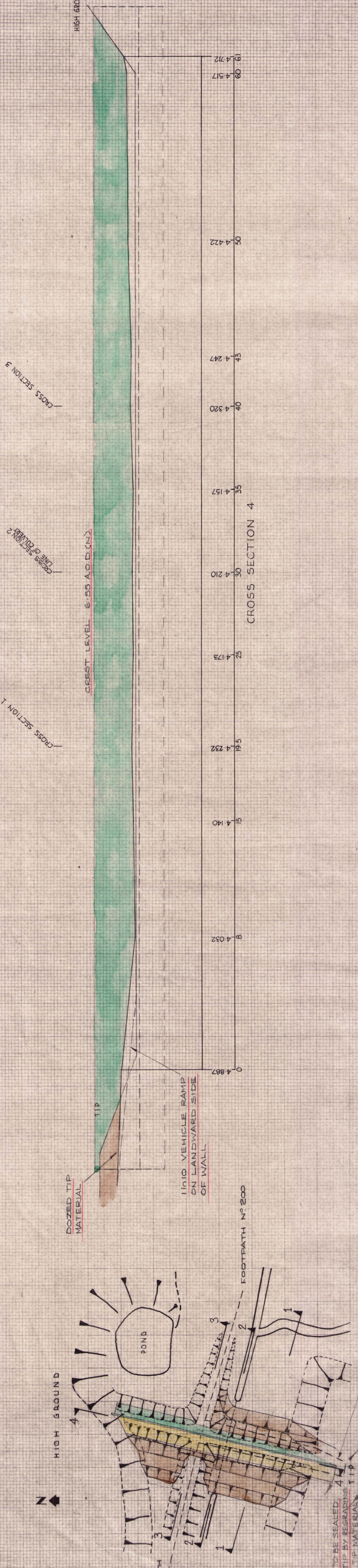
HE540039-CJV-GEN-GEN-TNT-GEO-00223 – Ground Movement Assessment (Stage 2) – Main Crossing.

HE540039-CJV-GEW-GEN-REP-TPI-00001 – Stage 1 Damage Assessment Report – Permanent Works.

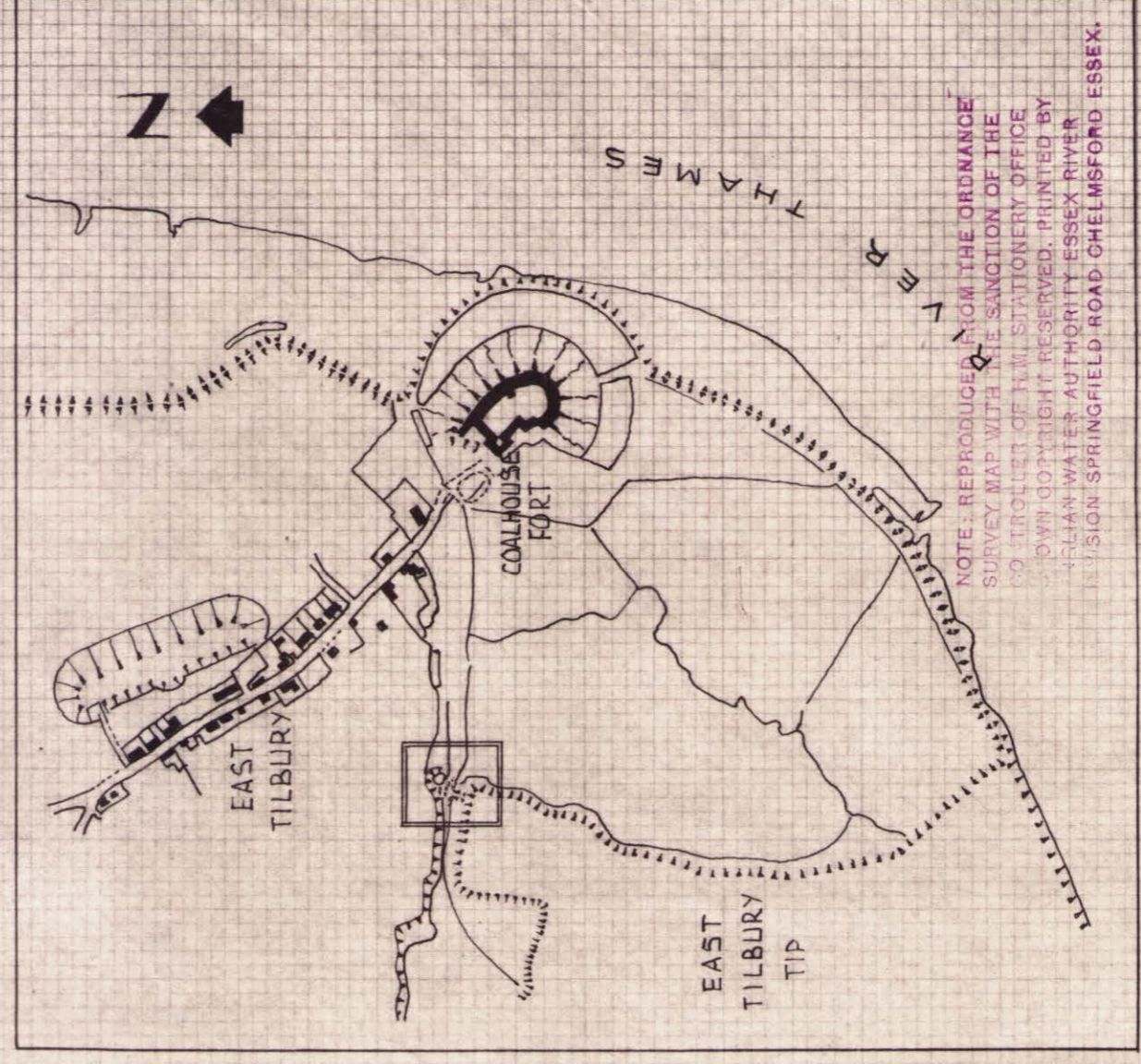
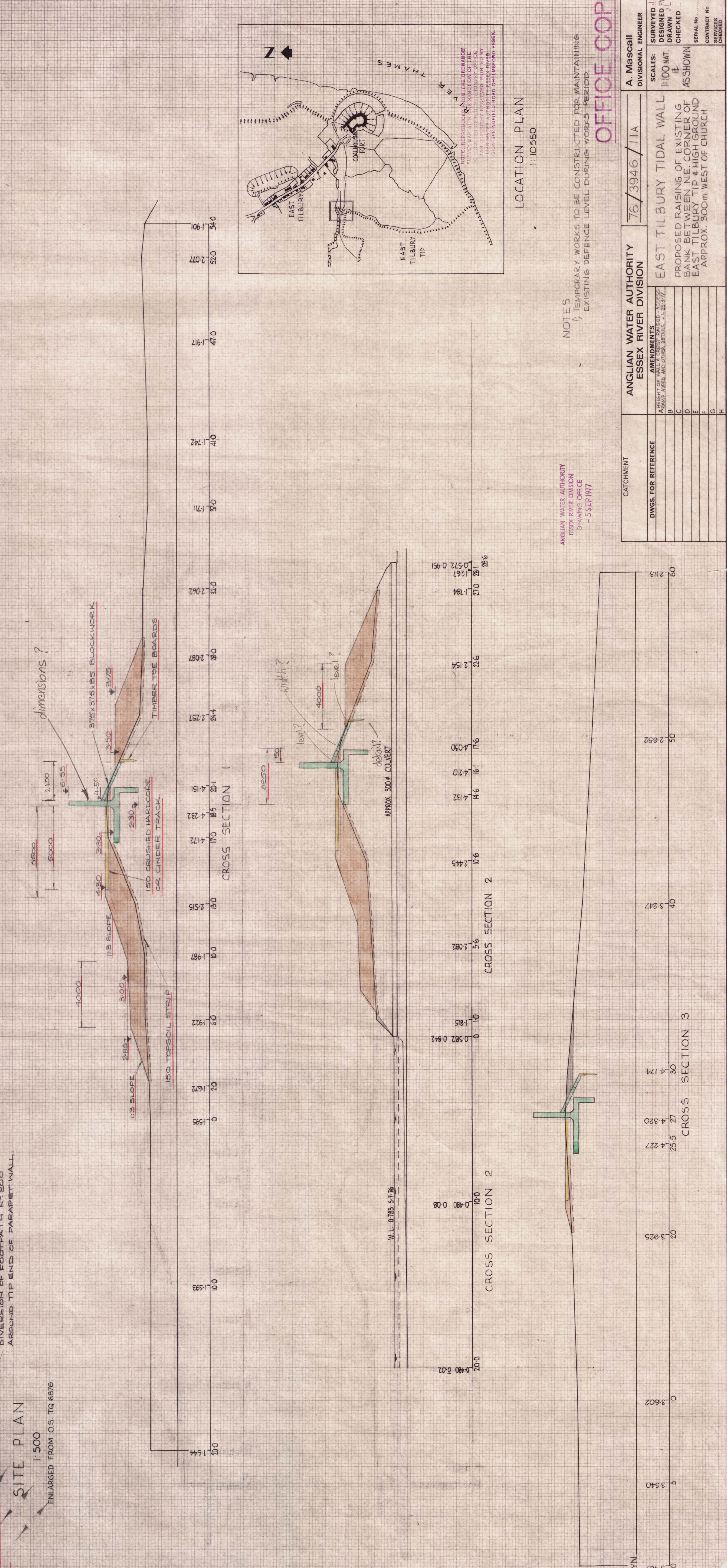
HE540039-CJV-GEN-GEN-TNT-GEO-00100 – Ground Movement Assessment (Stage 1) - Main Crossing.

HE540039-CJV-EGN-S07-TNT-ENV-00002 – North Portal Discharge Assumptions.

8. Appendix 1. East Tilbury Tidal Wall and Star Dam plans



SITE PLAN
1:500
ENLARGED FROM O.S. TQ 6876



LOCATION PLAN
1:10560

ANGLIAN WATER AUTHORITY
ESSEX RIVER DIVISION
DRAWING OFFICE
- 5 SEP 1977

NOTES
(1) TEMPORARY WORKS TO BE CONSTRUCTED FOR MAINTAINING EXISTING DEFENCE LEVEL DURING WORKS PERIOD

OFFICE COPY

CATCHMENT	ANGLIAN WATER AUTHORITY ESSEX RIVER DIVISION	A. Mascall DIVISIONAL ENGINEER
DWG'S FOR REFERENCE	76/3946/11A	SCALE: 1:100 MAT. DRAWN 1:24.75
AMENDMENTS	EAST TILBURY TIDAL WALL	P:00 MAT. CHECKED AS SHOWN
A		SERIAL NO.
B		CONTRACT NO.
C		SERVICES CHECKED
D		
E		
F		
G		
H		

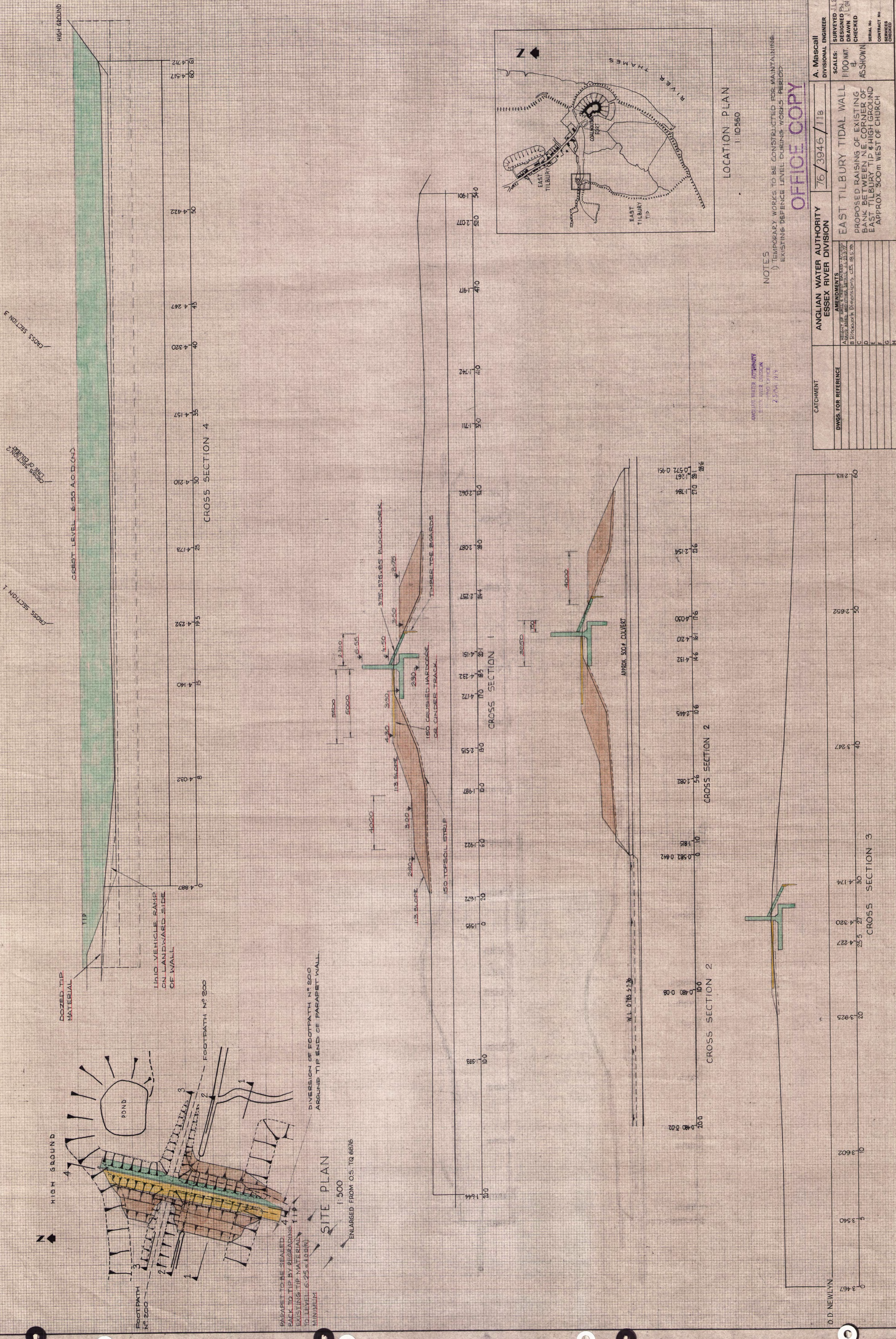
CROSS SECTION 1

CROSS SECTION 2

CROSS SECTION 3

CROSS SECTION 4

O.D. NEWLYN

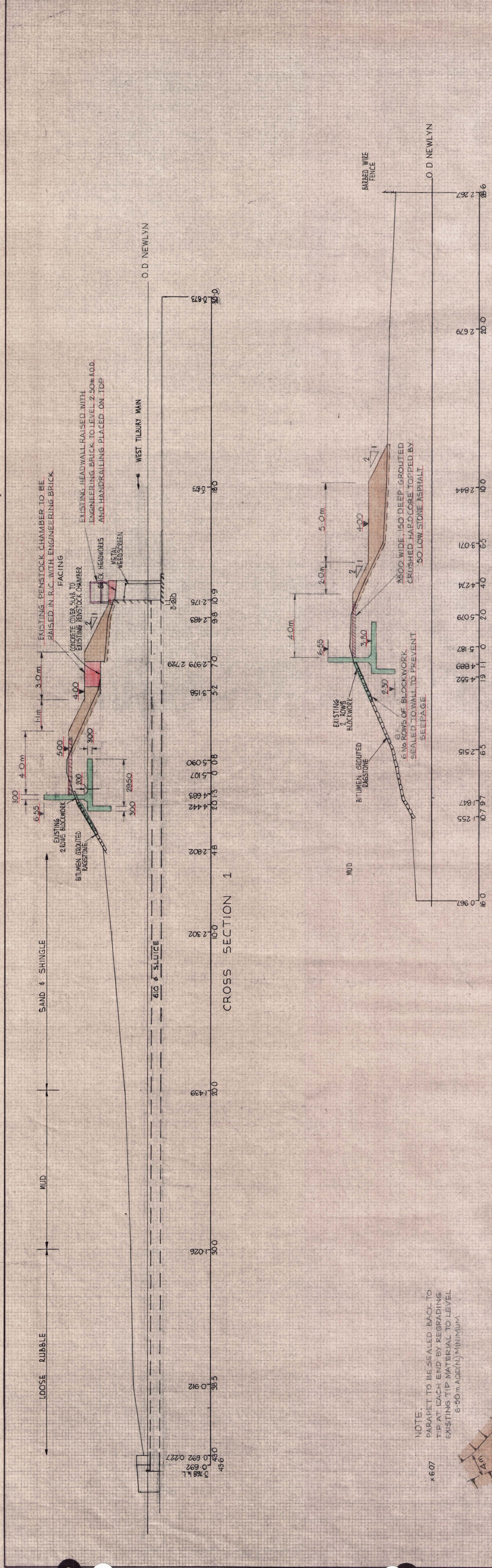


ANGLIAN WATER AUTHORITY
ESSEX RIVER DIVISION
DRAWING OFFICE
25/11/1978

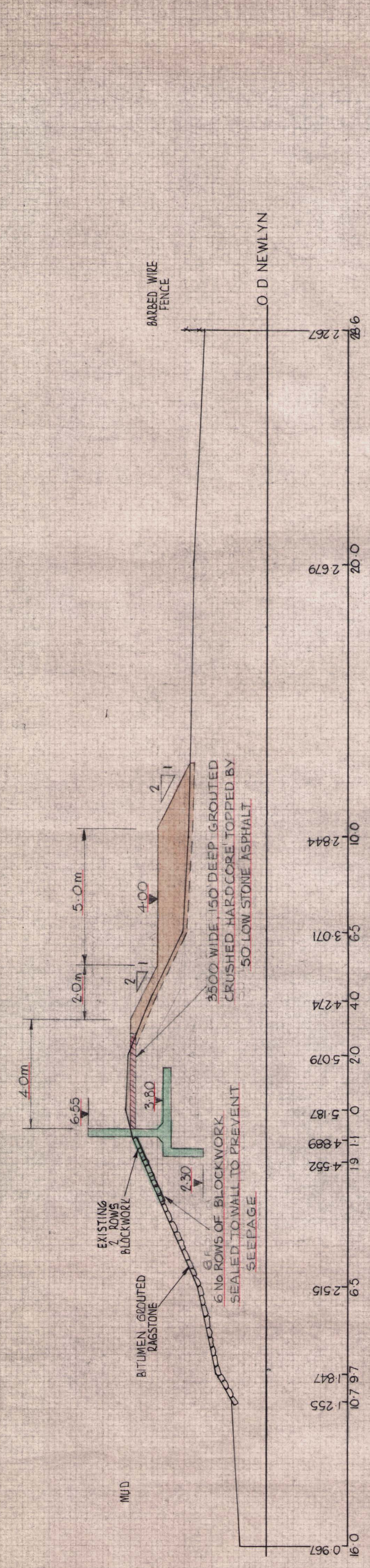
NOTES
1) TEMPORARY WORKS TO BE CONSTRUCTED FOR MAINTAINING EXISTING DEFENCE LEVEL DURING WORKS PERIOD

OFFICE COPY

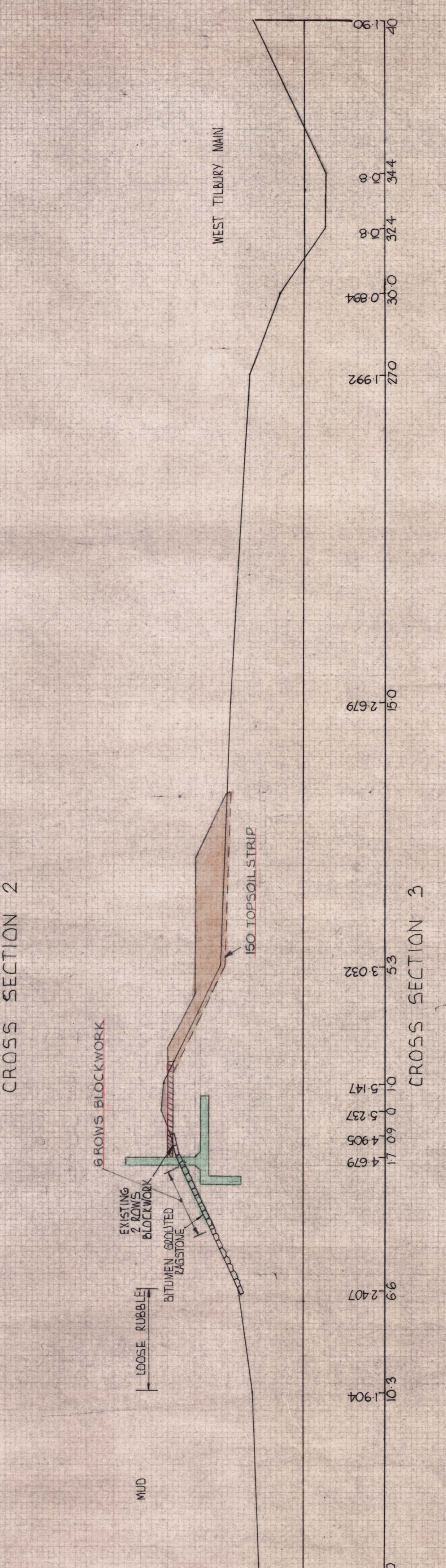
CATCHMENT		ANGLIAN WATER AUTHORITY ESSEX RIVER DIVISION		A. Mascall DIVISIONAL ENGINEER	
DWGS. FOR REFERENCE		76/3946/11B		SURVEYED 11/2/78	
AMENDMENTS		EAST TILBURY TIDAL WALL		DESIGNED 11/2/78	
A	As Issued	PROPOSED RAISING OF EXISTING BANK BETWEEN NE CORNER OF EAST TILBURY TIDAL WALL AND APPROX. 500m WEST OF CHURCH		CHECKED 11/2/78	
B	Blockwork Dimensions c/s 18.5.76			CHECKED	
C				SERIAL No.	
D				CONTRACT No.	
E				CHECKED	
F				CHECKED	
G				CHECKED	
H				CHECKED	



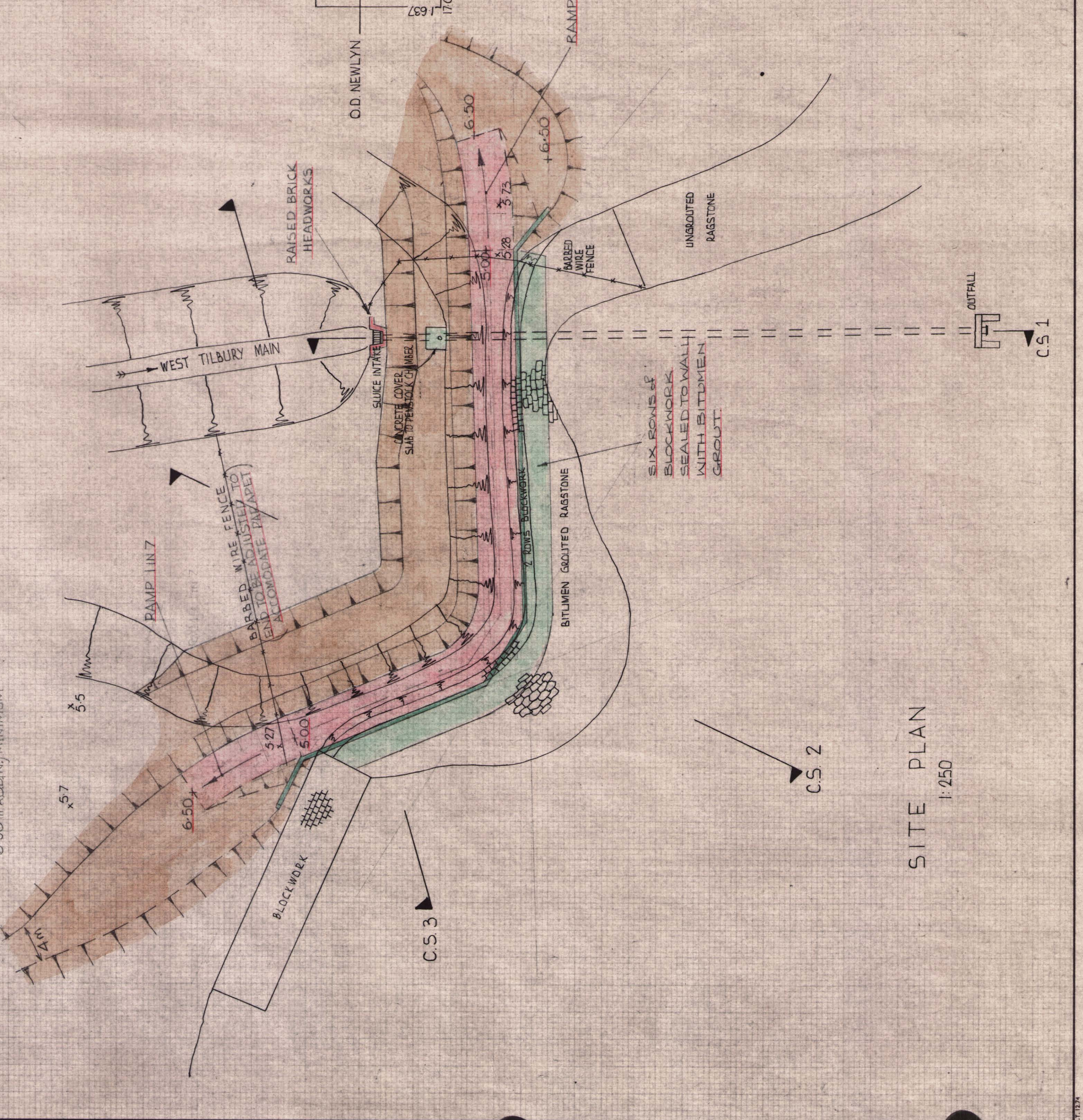
CROSS SECTION 1



CROSS SECTION 2



CROSS SECTION 3



SITE PLAN
1:250

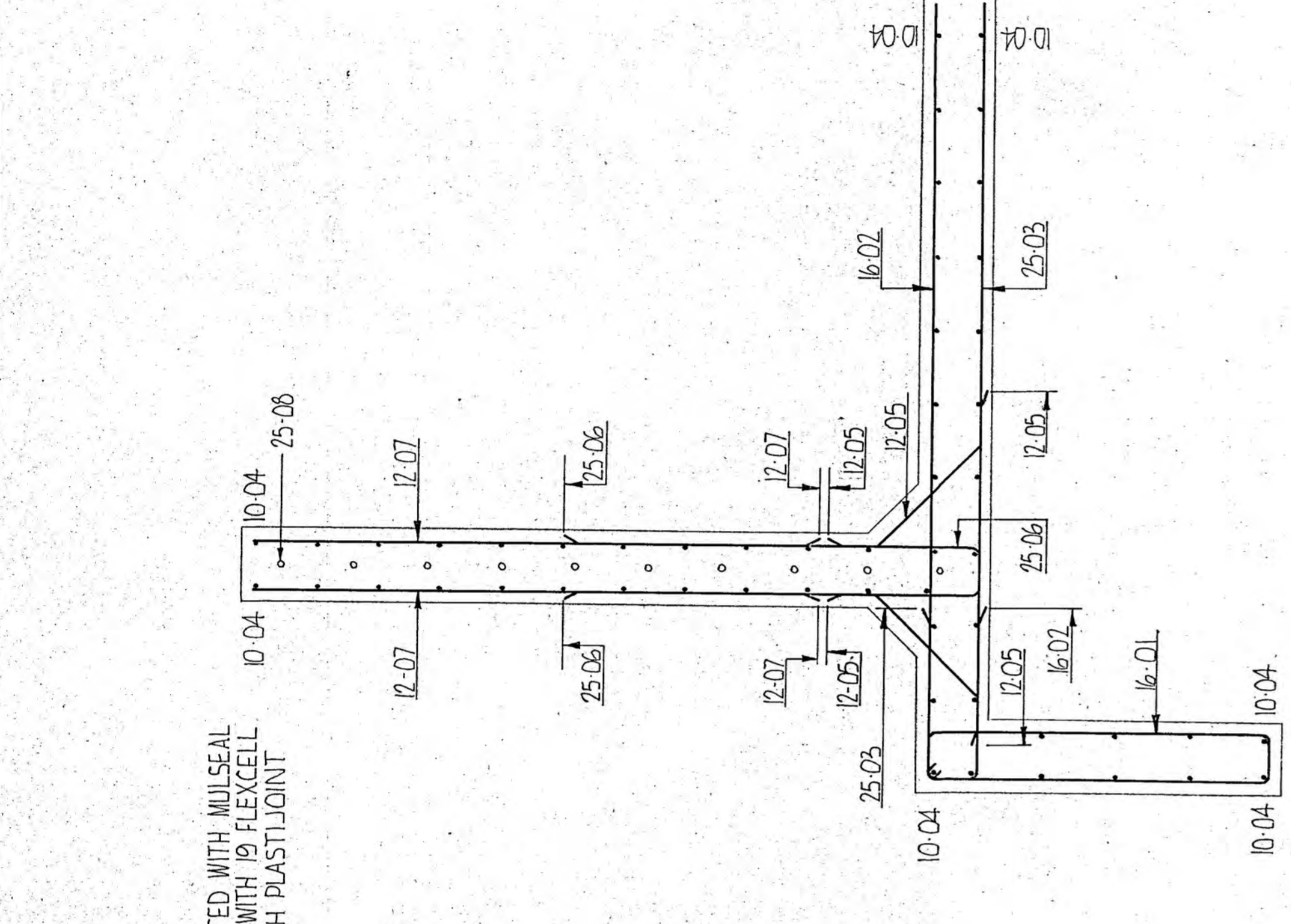
NOTES
 1) TEMPORARY WORKS TO BE CONSTRUCTED FOR MAINTAINING EXISTING DEFENCE LEVEL DURING WORKS PERIOD
 2) LEVELS BASED ON O.B.M. ON LANDWARD HEADWORKS OF BOWWATERS SLUICE - VALUE 1511m A.O.D.(N)

ANGLIAN WATER AUTHORITY
 ESSEX RIVER DIVISION
 DRAWING OFFICE
 25 MAY 1979

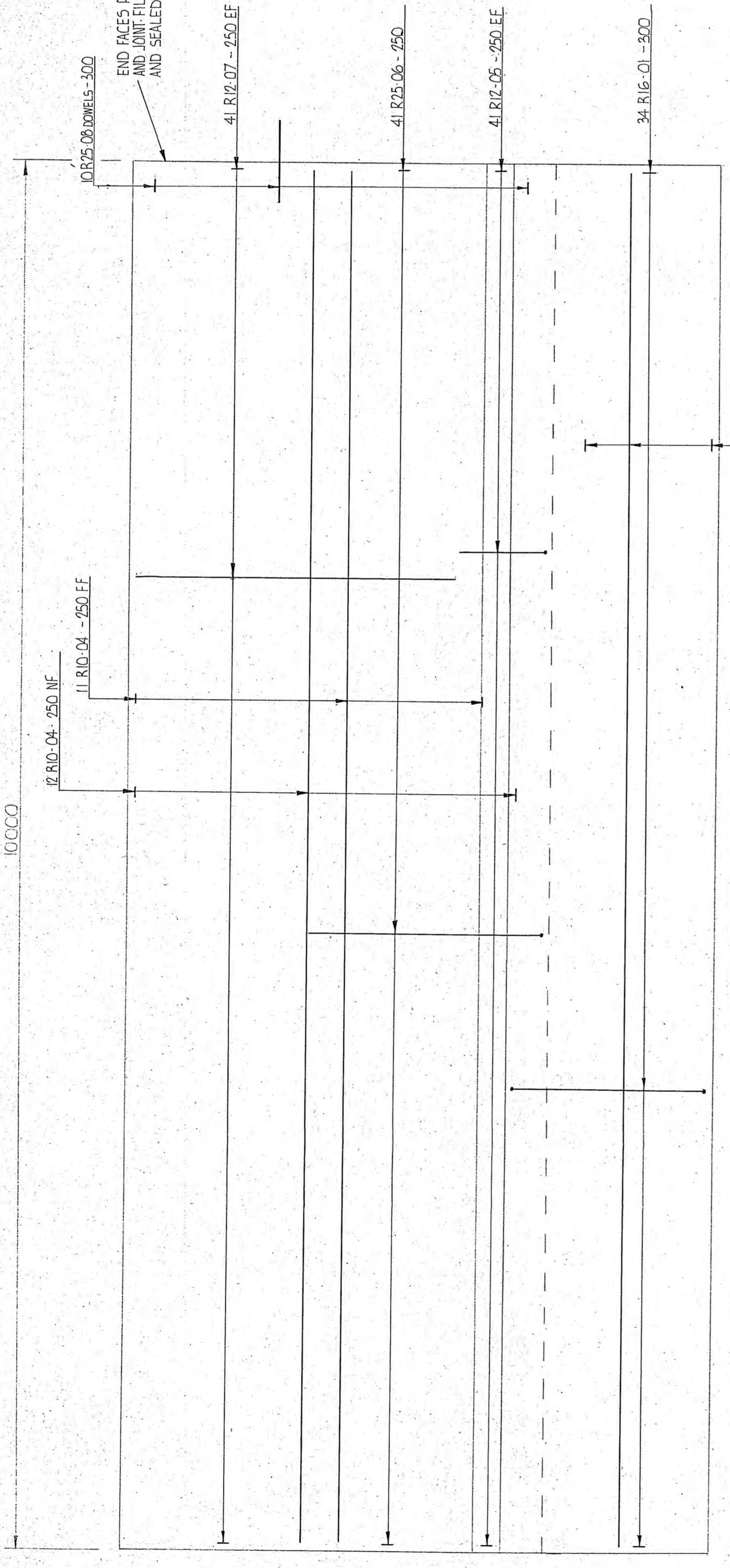
OFFICE COPY

CATCHMENT	ANGLIAN WATER AUTHORITY ESSEX RIVER DIVISION	76/3946/12c	A. Mascall DIVISIONAL ENGINEER
DWGS. FOR REFERENCE	AMENDMENTS		SCALE: SURVEYED 1:2500 DESIGNED 1:100 NAT DRAWN J.L. CHECKED P.W. AS SHOWN
	A. 10000		REVISION
	B. 10000		NO.
	C. 10000		DATE
	D. 10000		BY
	E. 10000		DATE
	F. 10000		BY
	G. 10000		DATE
	H. 10000		BY

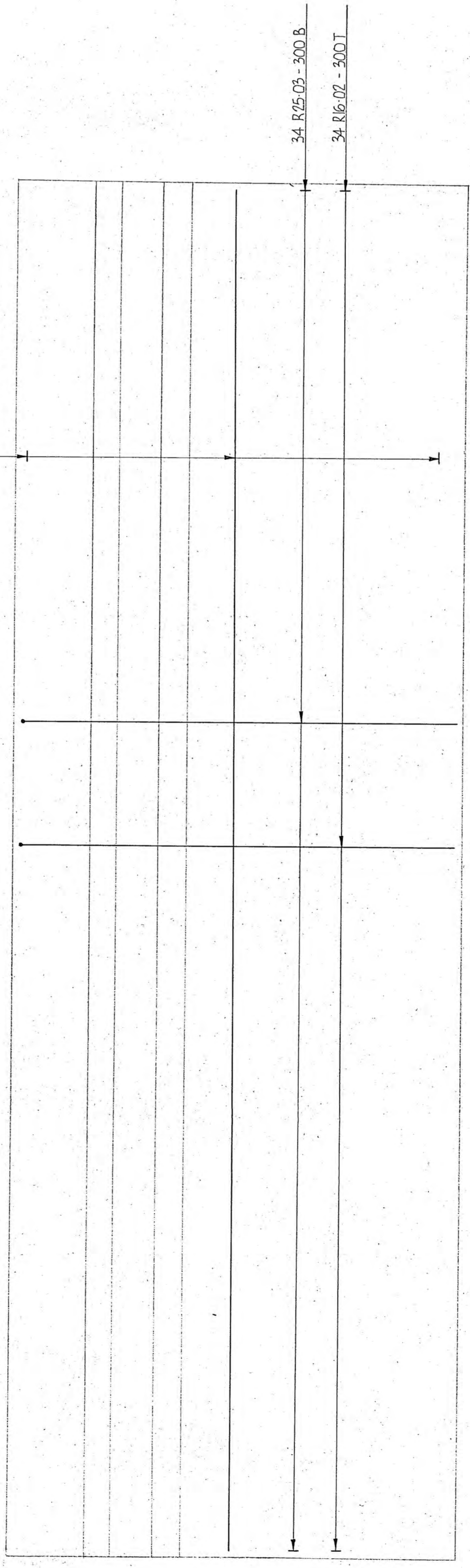
LOCATION PLAN
1:10560



SECTION

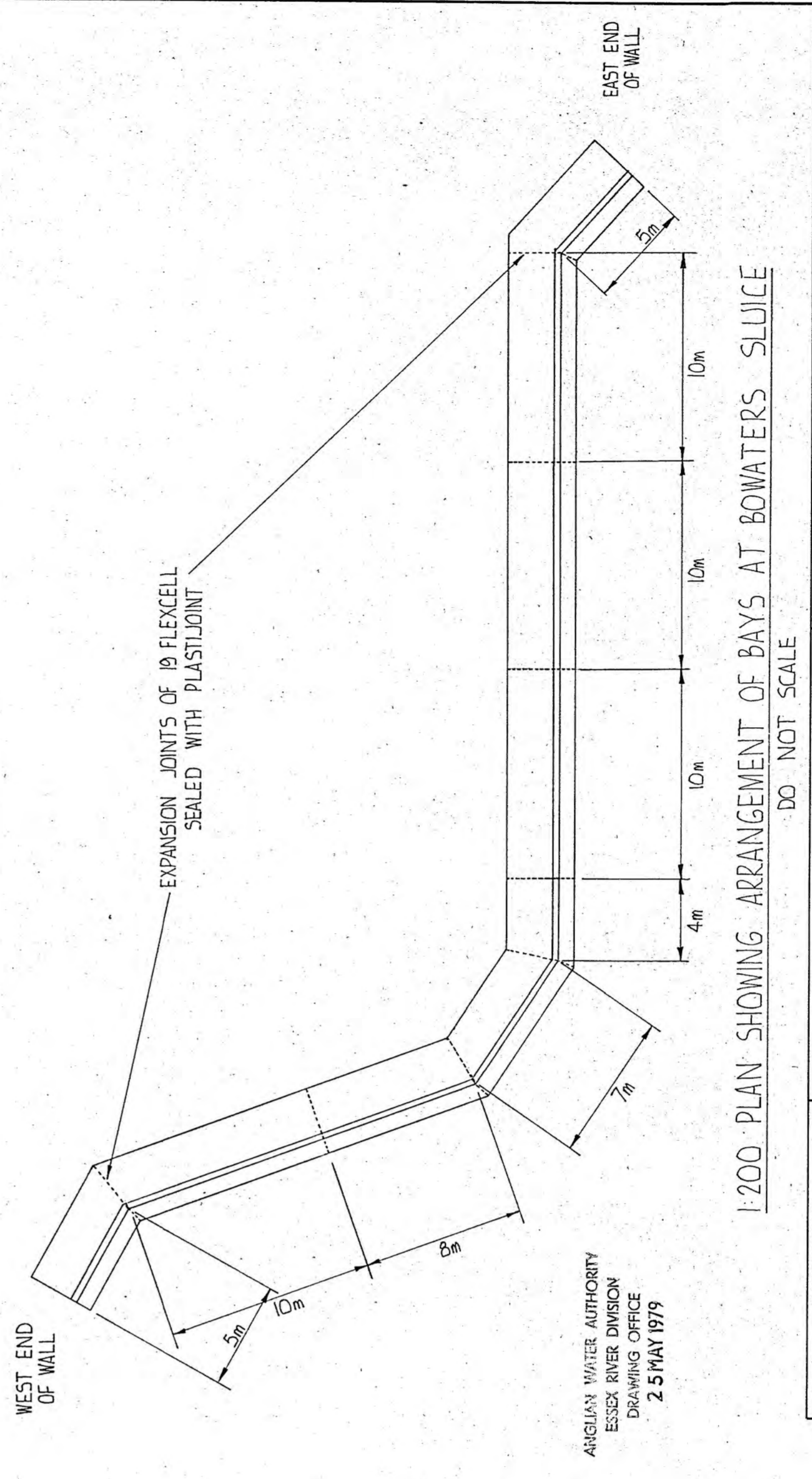


ELEVATION



PLAN

REINFORCEMENT DETAIL FOR ONE TYPICAL 10m LONG BAY



1:200 PLAN SHOWING ARRANGEMENT OF BAYS AT BOWATERS SLUICE

DO NOT SCALE

ANGLIAN WATER AUTHORITY
ESSEX RIVER DIVISION
DRAWING OFFICE
25 MAY 1979

- NOTES :
- 1) CONCRETE TO BE 1:1/4:3
- 2) MINIMUM COVER TO REINFORCEMENT TO BE 50
- 3) BAR MK 04 ON DRAWING CORRESPONDS WITH BAR Nos 09, 10, 11, 12 OR 13 ON BENDING SCHEDULE IN BAYS OF LESS THAN 10m LENGTH

CATCHMENT	ANGLIAN WATER AUTHORITY ESSEX RIVER DIVISION	79 / 3946 / 14	A. Mascall DIVISIONAL ENGINEER
DWGS. FOR REFERENCE	AMENDMENTS		SCALES: 1:20
	A		SURVEYED.....
	B		DESIGNED BY.....
	C		DRAWN BY.....
	D		CHECKED.....
	E		SERIAL No.....
	F		CONTRACT No.....
	G		SERVICES CHECKED.....
	H		

EAST TILBURY TIDAL WALL
LINK WALLS AT BOWATERS SLUICE AND NE CORNER OF TIP (COALHOUSE FORT)

REINFORCEMENT DETAILS

OFFICE COPY

Annex C.12 Agreed Statements

Flood Risk Assessment - Environment Agency Agreed Statement

**Site proposal and address: Lower Thames Crossing
Date: 10 October 2022**

Thank you for engaging with us regarding the Flood Risk Assessment prior to your formal examination submission of the Lower Thames Crossing (LTC) Nationally Significant Infrastructure Project (NSIP).

We can confirm that we support the content in the Flood Risk Assessment and are unlikely to raise any objections to the LTC NSIP you proceed to make based on this submitted information and discussions.

This is subject to:

- The listed documents being submitted as part of the application

The below updates were sent to us following our comments set out in our comments tracker – Sep 21 v2 Oct update sent on 11 November 2021. We reviewed the following updates and provided our comments via email as referenced below.

Documents

- **6.3 Environmental Statement Appendices – Appendix 14.6 Flood Risk Assessment – Part 1 (version received July 2022) - email ref 'FRA comments' dated 6/7/22**
- **6.3 Environmental Statement Appendices – Appendix 14.6 Flood Risk Assessment – Part 2 (version received July 2022) - email ref 'FRA comments' dated 6/7/22**
- **6.3 Environmental Statement Appendices – Appendix 14.6 Flood Risk Assessment – Part 3 (version received July 2022) - email ref 'FRA comments' dated 6/7/22**
- **6.3 Environmental Statement Appendices – Appendix 14.6 Flood Risk Assessment – Part 4 (version received July 2022)**
- **6.3 Environmental Statement Appendices – Appendix 14.6 Flood Risk Assessment – Part 5 (version received July 2022) – Subject to confirmation if a revised model will be submitted for further consultation referenced in our email dated 15/9/22.**
- **6.3 Environmental Statement Appendices – Appendix 14.6 Flood Risk Assessment – Part 6 (version received July 2022) – email from Michael Wilson dated 18/8/22 attaching the Breach modelling: Considering TE2 100 future barrier options as per our email dated 21/7/22 ref 'Response to FRA - Part 6'**

- **6.3 Environmental Statement Appendices – Appendix 14.6 Flood Risk Assessment – Part 7 (version received July 2022) – *Surface Water drainage comments provided by Lead Local Flood Authority***
- **6.3 Environmental Statement Appendices – Appendix 14.6 Flood Risk Assessment – Part 10 (version received July 2022) –*email dated 7/7/22 ref 'FRA comments'***
- **Flood Hydraulic Model Mardyke (version received May 2022) – *email dated 1/6/22 ref 'LTC CONSULTATION - Mardyke and Tilbury Main'***
- **Flood Hydraulic Model Tilbury Main (version received May 2022) - *email dated 1/6/22 ref 'LTC CONSULTATION - Mardyke and Tilbury Main'***

Please note this response is based on the information you have made available and our best available datasets at the time of this response. It is based on current national planning policy, associated legislation and environmental data / information. If any of these elements change we may need to reconsider our position.

Yours faithfully,

Richard Penn
Environment, Planning and Engagement Manager
Environment Agency

Water Framework Directive Assessment - Environment Agency Agreed Statement

Site proposal and address: Lower Thames Crossing

Date: 10 October 2022

Thank you for engaging with us regarding the Water Framework Directive Assessment prior to your formal examination submission of the Lower Thames Crossing (LTC) Nationally Significant Infrastructure Project (NSIP).

We can confirm that we support the content in the Water Framework Directive Assessment and are unlikely to raise any objections to the LTC NSIP you proceed to make based on this submitted information and discussions.

This is subject to:

- The listed documents being submitted as part of the application

Documents

- **6.3 Environmental Statement Appendices – Appendix 14.7 Water Framework Directive (version received 1 August 2022)**
- Subject to the document being updated following our comments **07: Lower Thames Crossing – Water Framework Directive Assessment Review (ref: KT/2018/125061/07-L01; dated 30 August 2022)**

These updates were requested following our comments 07: Lower Thames Crossing - Water Framework Directive Assessment Review (ref: KT/2018/125061/07-L01; dated 30 August 2022)'. LTC provided comments and an updated document for review on 29 September 2022. This has not been reviewed before NSIP submission.)

Please note this response is based on the information you have made available and our best available datasets at the time of this response. It is based on current national planning policy, associated legislation and environmental data / information. If any of these elements change we may need to reconsider our position.

Yours faithfully,

Richard Penn
Kent and South London Sustainable Places Team
Environment Agency

Hydrogeological Risk Assessment - Environment Agency Agreed Statement

Site proposal and address: Lower Thames Crossing

Date: 10 October 2022

Thank you for engaging with us regarding the Hydrogeological Risk Assessment prior to your formal examination submission of the Lower Thames Crossing (LTC) Nationally Significant Infrastructure Project (NSIP).

We can confirm that we support the content in the Hydrogeological Risk Assessment and are unlikely to raise any objections to the LTC NSIP you proceed to make based on this submitted information and discussions.

This is subject to:

- The listed documents being submitted as part of the application

Documents

- **6.3 Environmental Statement Appendices – Appendix 14.5 Hydrogeological Risk Assessment (version received 7 July 2022)**
- Subject to the document being updated as set out in **the letter from the Lower Thames Crossing Principal Hydrogeologist, National Highways, titled ‘Final response to EA comments 5 Aug 2022_v2’ including ‘Table 1: LTC response to Environment Agency comments of 5/8/2022’ (dated 12 September 2022).**

These updates were requested following our comments ‘(04) Hydrogeological Risk Assessment (HyRA) finalised 07.07.2022 (ref: KT/2020/127281/05-L01; dated 5 August 2022)’. We reviewed and agreed the updates in our comments ‘(05) Hydrogeological Risk Assessment (HyRA) (ref: KT/2020/127281/06/L01; dated 10 October 2022)’.

Please note this response is based on the information you have made available and our best available datasets at the time of this response. It is based on current national planning policy, associated legislation and environmental data / information. If any of these elements change we may need to reconsider our position.

Yours faithfully,

Richard Penn
Environment, Planning and Engagement Manager
Environment Agency

If you need help accessing this or any other National Highways information, please call **0300 123 5000** and we will help you.

© Crown copyright 2023.

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence:

visit www.nationalarchives.gov.uk/doc/open-government-licence/

write to the **Information Policy Team, The National Archives, Kew, London TW9 4DU**
or email psi@nationalarchives.gsi.gov.uk.

Mapping (where present): © Crown copyright and database rights 2022 OS 100030649. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form.

If you have any enquiries about this publication email info@nationalhighways.co.uk or call **0300 123 5000**.*

*Calls to 03 numbers cost no more than a national rate call to an 01 or 02 number and must count towards any inclusive minutes in the same way as 01 and 02 calls.

These rules apply to calls from any type of line including mobile, BT, other fixed line or payphone. Calls may be recorded or monitored.

Printed on paper from well-managed forests and other controlled sources when issued directly by National Highways.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

National Highways Company Limited registered in England and Wales number 09346363