national highways

Lower Thames Crossing

9.4 Relevant Representations Report

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Lower Thames Crossing

9.4 Relevant Representations Report

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Executive Summary

Background

The A122 Lower Thames Crossing (the Project) would provide a connection between the A2 and M2 in Kent and the M25 south of junction 29, crossing under the River Thames through a tunnel. As described in the Government's Road Investment Strategy 2: 2020–2025 (Department for Transport (DfT), 2020a), the new crossing would relieve congestion at Dartford and almost double cross-river road capacity east of London.

In October 2022 National Highways (the Applicant) submitted an application for development consent seeking powers to build and operate the Project. The application was accepted by the Planning Inspectorate, meaning that it would be subject to further scrutiny as part of the Examination phase, before a decision is made by the Secretary of State. As part of this process, the Planning Inspectorate invited Interested Parties to submit a Relevant Representation (RR) outlining the issues that they wished to be considered as part of the Examination

Relevant Representations

A total of 1,147 RRs were submitted to the Planning Inspectorate during the advertised period of 10 January 2023 and 24 February 2023. A further RR – submitted by Thurrock Council after the advertised period had closed – has been considered by the Applicant and is included in this report.

Of these RRs, 48 were submitted by organisations with whom the Applicant has a Statement of Common Ground (SoCG) [**Application Document APP-093**]. The remaining 1,100 were submitted by members of the public, landowners, businesses and organisations with whom the Applicant does not have an SoCG.

All RRs were carefully reviewed to establish whether the issues they contained are already addressed in the application for development consent and to enable the Applicant to prepare for the issues to be further considered as part of Examination.

The purpose and structure of this report

This report describes the processes followed by the Applicant to consider RRs and sets out the range of themes raised by Interested Parties. RRs submitted by SoCG organisations are addressed in Chapter 2. There is a focus on explaining which issues in those individual RRs are already included in the respective SoCGs and which are new issues.

RRs submitted by all other Interested Parties are addressed in Chapter 3. The approach taken by the Applicant, owing to the volume of RRs and the repetition of core concerns, is to group together common issues in these RRs according to a series of key themes corresponding to the headings used in the SoCGs. For example, there are themes covering 'Terrestrial Biodiversity' or 'Air Quality'. Responses have been provided to the themes and issues that were identified, including cross-reference to where those issues are addressed in the DCO Application.

Appendix A of the document provides a list of all Interested Parties who submitted an RR and a table indicating the themes that were identified in each.

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Conclusions

The Applicant appreciates the time and effort taken by each Interested Party to submit a RR. As demonstrated by the explanations and cross-references provided in this report, the Application addresses all issues concerning the Project that were raised in RRs, although it is acknowledged that RRs may not agree with the Applicant's assessments and their outcomes. The Examination provides a forum for these matters to be addressed and the Applicant is grateful for the opportunity to participate.

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1 Introduction

1.1 Overview

1.1.1 This report is a thematic response to the issues raised in the Relevant Representations (RRs) submitted to the Planning Inspectorate in respect of the A122 Lower Thames Crossing (the Project). The report also sets out the Applicant's responses to the issues raised.

1.1.2 A total of 1,148 RRs were submitted by Interested Parties (IP). Of these, 14 were submitted by local authorities, six by parish councils, 13 by other statutory consultees, and the remaining 1,115 by members of the public, landowners, businesses and non-statutory organisations.

1.1.3 Forty-eight of the RRs were submitted by organisations with whom the Applicant currently has a Statement of Common Ground (SoCG) [**Application Document APP-093**]. This report sets out the Applicant's response to RRs submitted by these organisations in Chapter 22 and refers to sections of the respective SoCGs that have been updated in light of comments provided in representations. More information on this process is provided in the introduction to Chapter 2.

1.1.4 The Applicant's response to RRs submitted by all other IPs is provided in Chapter 3.

1.1.5 All RRs have been reviewed and considered by the Applicant, in a process involving the technical specialists who were responsible for producing the documents that make up the Applicant's application for development consent. In providing responses to issues raised in RRs, this report provides appropriate cross-reference to where those issues are addressed in the DCO Application.

1.1.6 Common issues in RRs submitted by non-SoCG organisations have been identified and grouped together according to overarching themes, as described in the introduction to Chapter 3. Responses have been provided to the issues that were identified.

1.1.7 Some RRs, including those submitted by affected landowners or holders of rights over land, contained references to issues that only apply to that IP by virtue of their land interest and that are being progressed through direct discussions between the Applicant and those parties. This document does not report on those discussions.

1.1.8 RRs from non-SoCG organisations and individuals that did not raise a specific point have been considered by the Applicant, but responses are not included in this report. The same is true when an RR provides contextual information about, for example, an organisation's membership or status. Comments in support of the Applicant's proposals in respect of each SoCG heading are also excluded from Chapter 3, on the basis that no response to such comments is required in this report.

- While all RRs have been reviewed and considered, the purpose of this report is not to provide a direct response to each IP.

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1.2 Structure of this document

1.2.1 This report comprises three chapters:

a. Chapter 1: Introduction

b. Chapter 2: RRs from IPs with whom the Applicant currently has an SoCG

c. Chapter 3: RRs from IPs with whom the Applicant does not have an SoCG

1.2.2 The respective structures of Chapters 2 and 3 are set out in the introductory section of those chapters, but in essence, each chapter summarises the issues raised in the applicable RRs and provides a response either directly or by referring to a document or documents that form part of the Applicant's submission, using references to the Examination Library.

1.2.3 Appendix A comprises two tables. One sets out the names of IPs as they were provided on each RR that were submitted, alongside a unique reference number created by the Planning Inspectorate. The second table lists these reference numbers along the 'y' axis and each of the SoCG headings described above on the 'x' axis. The Applicant has provided a mark in each appropriate cell on this table to indicate the SoCG topics that were identified in the RRs. For the purposes of assembling Appendix A and in order to provide a comprehensive overview of the topics raised in all RRs, the SoCG headings were applied to all RRs, including those with whom the Applicant has an SoCG.

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1.3 Overview of the management of impacts and proposed mitigation measures

1.3.1 Many issues raised in the RRs that are responded to in this report are concerned with impacts that may arise from the construction and operation of the Project, and the extent to which the Applicant would manage them.

1.3.2 This section sets out a high-level summary of the various ways in which the Applicant has made commitments which would be legally binding through a series of draft documents that were submitted as part of its application for development consent and which would evolve if consent is granted and construction begins.

1.3.3 By undertaking an Environmental Impact Assessment, the Applicant sought to identify and incorporate suitable measures and mitigation for likely significant effects as a result of the Project. The draft DCO in Schedule 2 sets out the mechanisms by which this mitigation is secured. Plate 1.1 illustrates how the DCO and control documents work together to ensure the delivery of the Project is in accordance of the planned mitigation.

1.3.4 The Code of Construction Practice, First Iteration of Environmental Management Plan (CoCP) [**Application Document APP-336**] sets out a framework for how the mitigation and management of the identified environmental effects would be delivered and maintained. The CoCP includes a Register of Environmental Actions and Commitments (REAC) in Chapter 7. The CoCP and REAC would provide control over the construction and development of the Project. An Environmental Management Plan (second iteration) (EMP2) would need to be prepared and approved by the Secretary of State before the authorised development commences. The EMP2 must be substantially in accordance with the CoCP and the mitigation measures in the REAC, and the Applicant would be responsible for ensuring that the work of its Contractors fulfils the requirements it sets out.

1.3.5 The CoCP and REAC sit within a suite of documents known as the Control Plan, which is the framework for mitigating, monitoring and controlling the effects of the Project. It is made up of a series of ‘control documents’ which present the mitigation measures identified in the application that must be implemented during design, construction and operation to reduce the adverse effects of the Project. The Control Plan is illustrated in Plate 1.1.

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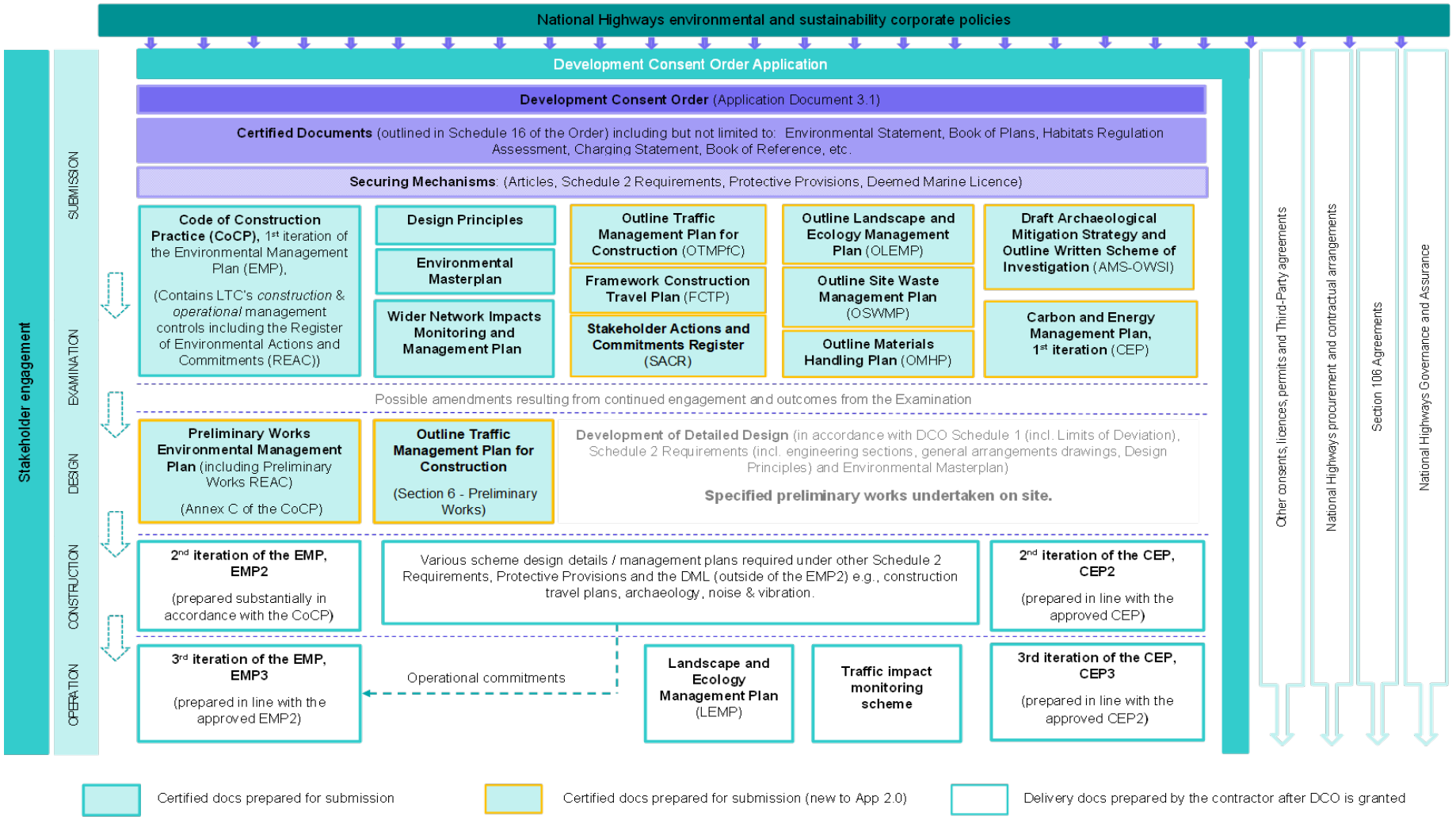
Plate 1.1 Control Plan



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2 Relevant Representations submitted by organisations with whom the Applicant has a Statement of Common Ground

2.1 Introduction

2.1.1 As described in Chapter 1 of this report, 48 RRs were submitted by organisations with whom the Applicant has produced a Statement of Common Ground (SoCG), with the remaining 1,100 submitted by individuals or other organisations.

2.1.2 RR were submitted by the following organisations with whom the Applicant has produced a Statement of Common Ground (SoCG):

a. Anglian Water Services Limited

b. Barking Power Limited

c. Cadent Gas Limited

d. Cobham Parish Council

e. Cuxton Parish Council

f. Dartford Borough Council

g. Dover District Council

h. DP World Limited

i. Emergency Services and Safety Partnership Steering Group

j. Environment Agency

k. Essex County Council

l. Essex Police

m. Forestry Commission

n. Gravesham Borough Council

o. Higham Parish Council

p. High Speed 1 Limited

q. Historic England

r. ITS Technology Group Limited

s. Kent County Council

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t. Kent Downs Area of Outstanding Natural Beauty Unit

u. London Borough of Havering

v. Luddesdown Parish Council

w. Lumen Technologies UK Limited

x. Maidstone Borough Council

y. Marine Management Organisation

z. Medway Council

aa. Meopham Parish Council

bb. National Gas Transmission

cc. National Grid Electricity Transmission

dd. Natural England

ee. Network Rail Infrastructure Limited

ff. NHS Kent and Midway Integrated Care Board

gg. North Kent Marshes Internal Drainage Board

hh. Northumbrian Water operating as Essex and Suffolk Water

ii. Port of London Authority

jj. Port of Tilbury London Limited

kk. Royal Mail Group Limited

ll. Sevenoaks District Council

mm. Shorne Parish Council

nn. Southern Gas Networks

oo. Southern Water Services Limited

pp. Swale Borough Council

qq. Thames Chase Trust

rr. Thames Water

ss. Thurrock Council

tt. Thurrock Power Limited

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uu. Tonbridge and Malling Borough Council

vv. Transport for London

2.1.1 All RRs were carefully reviewed by the Applicant, but those submitted by SoCG organisations are reported on separately and in a different format to other RRs. That is because points raised in RRs by SoCG organisations are primarily addressed through their SoCGs, where they can be seen in the wider context of issues raised by those organisations through ongoing engagement with the Applicant. Updated SoCGs, incorporating comments made in RRs and through other forms of engagement since the submission of the Application, were submitted by the Applicant at Deadline 1 (DL 1). Where a RR was submitted by an Interested Party, but the accompanying SoCG remains in Development at DL 1, the Applicant has provided a response within this document.

2.1.2 The purpose of this section is to provide a link between matters raised in SoCGs and the SoCG party's RR (to provide the Examining Authority with a full review of the RRs received) where agreement between the parties has been secured the updated SoCG is submitted alongside this report for DL 1, other SoCGs will be agreed and submitted at the first available deadline. The SoCGs are dynamic documents so the positions set out in this section will continue to evolve and the SoCGs will represent the latest position as they are submitted or updated at each future deadline.

2.1.3 This chapter comprises a series of sections, with one section for every SoCG organisation that submitted a RR. Each section contains between one and three tables, covering the following types of issues identified in the applicable RR:

a. Matters raised prior to the RR Period and acknowledged within an SoCG. These matters are captured within SoCGs submitted as part of the DCO Application.

b. New Matters raised in RRs, which are addressed in SoCGs submitted at DL 1 or are currently anticipated to be submitted at subsequent deadlines.

c. New and existing matters raised in RR, which have been addressed outside of the SoCG. These Matters have not been specifically requested to be included in the SoCG on the basis that they have been or are being resolved through ongoing ‘business as usual’ engagement with the Interested Party.

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2.2 Anglian Water Services Limited

Introduction

2.2.1 Anglian Water Services Limited (Anglian Water) is the statutory wastewater recycling provider (sewerage undertaker) for the Project area north of the River Thames.

2.2.2 In 2022, the Applicant and Anglian Water prepared an SoCG. However, that document was not submitted as part of the DCO application by mutual agreement. Since then, the parties have worked collaboratively to produce an SoCG, which has been submitted at DL 1.

Overview of matters raised in Anglian Water's RR

2.2.3 All matters within the Anglian Water SoCG have been resolved as Matter Agreed at DL 1, this includes three new Matters raised within the RR. Table 2.1 sets out those Matters and outlines the Applicant's response to them. The Applicant's full response can be viewed in the SoCG.

Table 2.1 New Matters raised in RRs, which are addressed in the SoCG submitted at DL 1

Heading	Matter	The Applicant's response	Status
Protective Provisions	Anglian Water requested the Applicant to consider including updated Protective Provisions into the draft DCO prior to submission, to negate the need for a separate side agreement.	This matter has been resolved through an agreement between the parties as set out in matter 2.1.8, 2.1.9 and 2.1.10 of the SoCG.	Matter Agreed
DCO and Consents	Anglian Water require amendments to the Requirements (Sch. 2 Pt. 1) of the draft DCO to include the statutory sewerage undertaker to be a stated consultee on arrangements for surface and foul water drainage, in addition to the drainage authorities, lead local flood authority and the Environment Agency.	This matter has been resolved through an agreement between the parties as set out in matter 2.1.8, 2.1.9 and 2.1.10 of the SoCG.	Matter Agreed
Design – Road, Tunnels, Utilities	Anglian Water is concerned about the provision of wastewater connections for construction compounds. There is a need for National Highways to re-engage with Anglian Water given the implications of different charging regimes that changes responsibility for the conveyance to reach the point of connection to the foul sewer, and to confirm whether there will be any trade effluent discharges.	The Applicant has developed models showing the sewers that may have the capacity to take additional wastewater. These models have been shared with Anglian Water. The new connections to the Anglian Water network are to be planned and delivered by the Contractor. This includes any necessary applications under the Water Industry Act 1991.	Matter Agreed

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Heading	Matter	The Applicant's response	Status
		This matter has been resolved through an agreement between the parties as set out in matter 2.1.6 of the SoCG.	

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2.3 Barking Power Limited

Introduction

2.3.1 Barking Power Limited (BPL) owns the length of pipeline affected by the Project that is listed in Schedule 1 to the draft DCO and represented in the Works Plans (Works Nos. G8 and G9). This is contained in Works Plans [**Application Documents APP-018 and APP-021 and Additional Submissions AS-024 to AS-030**].

2.3.2 In 2022, the Applicant and BPL prepared an SoCG. However, that was not submitted as part of the DCO application. The SoCG remains under development and parties expect that an updated SoCG will be submitted at a later examination deadline.

Overview of matters raised in BPL's RR

2.3.3 The RR confirmed that the majority of matters in the draft SoCG are agreed. The RR highlights one new matter which has been included in the draft SoCG, to be submitted at a later examination deadline. Table 2.2 outlines that issue and provides the Applicant's response.

Table 2.2 New matters raised in the RR, included in the SoCG to be published at a later examination deadline

Heading	Matter	The Applicant's response	Status
Timing of works	BPL seeks assurance that Works Nos. G8 and G9 will not be carried out during BPL's decommissioning of its adjoining pipeline. The Applicant has been asked to maintain liaison with BPL regarding timing of Works Nos. G8 and G9, to use reasonable endeavours to avoid impeding BPL's decommissioning works to the pipeline and to acknowledge that loss requiring compensation may be caused to BPL should Works Nos. G8 and G9 interfere with or delay BPL's pipeline decommissioning works.	Both parties recognise that the ministerial announcement of a two-year change to the Applicant's construction programme means that a clash between the Applicant's and BPL's respective programmes is now highly unlikely. The parties have agreed to liaise on construction programmes in a separate agreement between them. Consequent to this agreement, BPL does not consider that it will have an enduring role in the examination. BPL will notify the Examining Authority of its intent in this regard.	Matter Agreed

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2.4 Cadent Gas Limited

Introduction

2.4.1 Cadent Gas Limited (Cadent) is a licensed gas transporter under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in North London, West Midlands, East and North-West England.

2.4.2 The Applicant and Cadent prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-105**]. The parties have worked collaboratively to update the SoCG, which has been submitted at DL 1.

2.4.3 Some of the Matters included in Cadent's RR are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. These Matters are presented in Table 2.3, along with the applicable item number. New Matters raised in Cadent's RR that were not included in the DCO Application SoCG are presented in Table 2.4.

Overview of matters raised in Cadent's RR

Table 2.3 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
DCO and Consents	Power, land rights and acquisition	2.1.1	[**Application Document APP-105**]
Design – Road, Tunnels, Utilities	Diversions and design conflict	2.1.5	
Protective Provisions	Modified Protective Provisions	2.1.10	

Table 2.4 New matters raised in RRs, which have been included in SoCG submitted at DL 1

Heading	Matter	The Applicant's response	Status
Design – Road, Tunnels, Utilities - Decommissioning of pipelines	Cadent requested that the Applicant provide Cadent with assurance that adequate land, rights and consents have been included within the DCO to allow Cadent to undertake decommissioning works and surrender liability	The Applicant and Cadent are in active discussion about the appropriate approach to take with regard to Cadent's decommissioned pipeline which is outside the Order Limits. This is to be agreed between both parties via other arrangements.	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	of decommissioned assets where necessary. In particular, Cadent states that there is an extensive section of pipeline to be decommissioned in relation to work number G6.		
Design – Road, Tunnels, Utilities - Work Number G5 – Insufficient Land Rights	Cadent advised the Applicant in October 2022 that it requires permanent easement rights over plot 28-130 which is currently shown as land for temporary use only. Cadent requests that this plot is amended to blue and includes rights for the benefit of Cadent within Schedule 8. Cadent requires permanent rights for the ongoing maintenance, protection and access of its pipeline.	The Applicant has notified the Examining Authority regarding a request to amend the alignment of Work No G5 and change the associated land plot 28-130 to reflect those rights sought as requested by Cadent. Following a period of targeted consultation, the Applicant proposes to submit revised Works Plans, Land Plans and other associated documents reflecting this at and following Deadline 4.	Matter Under Discussion
Design – Road, Tunnels, Utilities - Construction Access	Cadent requests that the Applicant be responsible for securing adequate temporary access and egress to construction working areas. Cadent has concerns in relation to work number G10 and	The Applicant accepts responsibility for the provisions of adequate access and egress to construction working areas and is mindful of Cadent's concerns with regards to the existing pipeline diversion associated with Works No G10 and any existing pipeline in the area. The Applicant is exploring different avenues to address Cadent's concerns and will continue to engage with Cadent regarding this. Interested Parties have submitted Relevant Representations regarding	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	safe access from the M25 to Cadent work site and welfare. The Applicant has not provided a clear access solution. The Applicant is to provide assurances that it will obtain agreement with National Highways operations, and take responsibility for ALL traffic management throughout the works and any applications for lane closures etc.	Heavy Goods Vehicle (HGV) access to Beredens Lane ULH. The Applicant is implementing a HGV ban on Beredens Lane and restricting the use of Beredens Lane to motorway prohibited vehicles and emergency vehicle access only. This is be secured via a modification to the outline Traffic Management Plan for Construction (oTMPfC). The oTMPfC (at submission) contains provisions for narrow lanes and independent lane running on the M25 and A127 slip road that would permit segregated access for Cadent and the Applicant's construction vehicles from the public road users. This will afford access and egress to the existing A127 slip road pond access. At the detailed planning stage, the Applicant will liaise with Cadent and communicate the temporary traffic management provisions to be installed by the Applicant including length, programme and any access and egress arrangements for Cadent's consideration. It is envisaged this would be a system such as varioguard road barrier opposed to cones to ensure the safety of the workforce, as is typical with works on the strategic road network.	

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2.5 Cobham Parish Council

Introduction

2.5.1 Cobham Parish Council is made up of nine Councillors, five representing Sole Street and four representing Cobham and Ifield. Cobham Parish Council provides a number of services for the village in conjunction with Gravesham Borough Council and Kent County Council. Cobham Parish Council is a prescribed consultee for the Project, under s42(1)(a) of the Planning Act 2008.

2.5.2 The Applicant and Cobham Parish Council prepared an SoCG that was submitted as part of the DCO Application [**Application Document APP-132**]. The parties have worked collaboratively to update the SoCG, which has been submitted at DL 1

2.5.3 All of the issues raised in the council's RR are represented within the SoCG.

2.5.4 The matters included within the RR are the same or fundamentally similar to those addressed within the SoCG submitted as part of the DCO Application. Table 2.5 sets out those issues and provides references within that SoCG.

Overview of matters raised in Cobham Parish Council's RR

Table 2.5 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Construction	Closures and diversions	2.1.8	[**Application Document APP-132**]
Operation and maintenance	Traffic	2.1.12	
Traffic and economics	Modelling methodology	2.1.14, 2.1.15, 2.1.16, 2.1.19	
	Local growth plan	2.1.17	
	Modelling Wider Network Impacts	2.1.23	
	Local modelling requests	2.1.22	
Wider Network Impacts	Local WNI concerns	2.1.24, 2.1.25, 2.1.26, 2.1.29, 2.1.31, 2.1.32	
	Non-Project highway improvements	2.1.30	
Population and human health	Walkers, cyclists and horse riders (WCH)/active travel – design	2.1.20, 2.1.34	

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2.5.5 There were no new matters raised in the RR.

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2.6 Cuxton Parish Council

Introduction

2.6.1 Cuxton Parish Council provides a number of services for the village in conjunction with Gravesham Borough Council and Kent County Council. Cuxton Parish Council is a prescribed consultee for the Project, under s42(1)(a) of the Planning Act 2008.

2.6.2 Following the request in the Rule 6 Letter for a new SoCG between the Applicant and Cuxton Parish Council, the Parties have prepared an SoCG that was submitted at DL 1.

2.6.3 All of the issues raised in the council's RR are represented within the SoCG in Table 2.6.

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Overview of matters raised in Cuxton Parish Council's RR

Table 2.6.New matters raised in the RR, and included inthe SoCG at DL 1

Heading	Matter	The Applicant's response	Status
Construction	Cuxton Parish council believe that increased traffic during construction will occur when the number of lanes on the A2 will be reduced to facilitate the construction traffic. This will have a major impact on the volume of traffic using the rural roads between Cobham and the A228.	The Applicant has set out its illustrative requirements of traffic management in the outline Traffic Management Plan for Construction (oTMPfC), Table 4.2. The Project approach is based on maintaining all lanes on the A2 and working under narrow lane and hard shoulder closure for long-term traffic management. There will be a requirement under night-time working to close sections of the A2 outside normal working hours when traffic flows are lower. The oTMPfC outlines the arrangements for a Traffic Management Forum (TMF) to be formed with the relevant highway and planning authorities along with other interested parties invited as required who will be consulted on in the development of traffic management plans and to review traffic management performance during construction. In addition, where required, appropriate mitigation measures will be established to manage impacts.	Matter Not Agreed
Traffic and economics	Concern that increased traffic through the village, past the schools, nurseries and shops has the potential to increase the risk of accidents, particularly those involving pedestrians and cyclists.	The forecast impacts of the Project on the road network are set out in the Traffic Forecasts Non-Technical Summary, and the Transport Assessment. On Bush Road the model forecasts that the change in flow would be between -49 to +50 Passenger Car Units (PCUs) in the AM and inter-peak. In the PM peak there would be an increase eastbound of between 101 and 250 PCUs. The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
		evidence to support scheme development and case-making through existing funding mechanisms and processes. The list of proposed monitoring locations is set out in the Wider Network Impacts Management and Monitoring Plan, and further locations can be proposed by highway authorities.	
Wider Network Impacts	Cuxton Parish council believe damage to the highway along Bush Road will occur because of increased traffic.	The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes. The list of proposed monitoring locations is set out in The Wider Network Impacts Management and Monitoring Plan (WNIMMP) and further locations can be proposed by highway authorities, subject to certain criteria being met. The Applicant is also working closely with Kent County Council (acknowledging that Bush Road is in Medway) to help them understand the forecast impact of the Project on their road network, this includes sharing more detailed data with them from the Project's transport model. The scope of this work includes the A228 corridor and its junction with Bush Road.	Matter Not Agreed
Wider Network Impacts	Cuxton Parish Council believe the predicted increase in the volume of traffic (Ref 7.16 Community Impact Report [**APP-549**] p318, 7.1.34) will result in queuing in the south arm of the Bush Road/A228 junction. Because this junction is not signalised; the length of the queues at the junction may effectively block access to the main residential area of the village.	The forecast impacts of the Project on the road network are set out in the Traffic Forecasts Non-Technical Summary, and the Transport Assessment. This shows that in the opening year there would be increases in traffic flow of up to 500 passenger car units (PCUs) on the A228. On Bush Road the model forecasts that the change in flow would be between -49 to +50 PCUs in the AM and inter-peak. In the PM peak there would be an increase eastbound of between 101 and 250 PCUs.	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
	It is Cuxton Parish Council's belief that if this happens on street parking and queuing traffic will eventually prevent vehicles entering the village with serious consequences for northbound traffic on the A228.	The Applicant has identified adverse impacts on the road network as presented in Section 7.6 of the Transport Assessment which does not identify this junction. The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case-making through existing funding mechanisms and processes. The list of proposed monitoring locations is set out in the Wider Network Impacts Management and Monitoring Plan, and further locations can be proposed by highway authorities.	
Air Quality	Cuxton Parish Council think that air pollution in the vicinity of Cuxton will exceed the annual mean NO2 AQS objective even in the absence of the Project (Ref 7.16 Community Impact Report [**APP-549**] p319, 7.1.44)	An exceedance of the annual mean nitrogen dioxide (NO_2) Air Quality Strategy objective is predicted at five properties (human receptors) adjacent to the A228 Rochester Road/Sundridge Hill in both the 'with Project' and 'without Project' scenarios. The Project is also expected to lead to an increase in NO_2 concentrations. However, as described in Environmental Statement (ES) Chapter 5: Air Quality, the Project is not expected to have a significant air quality effect on human receptors, and it is likely that the Project assessment has overpredicted annual mean NO_2 concentrations along the A228. Furthermore, although mitigation for air quality impacts on human receptors is not required (as there are no significant effects), numerous measures have been investigated to determine whether the air quality impacts of the Project can be reduced along the A228 corridor. The measures investigated included introducing a Clean Air Zone, applying lower speed limits, HGV bans, traffic calming, use of air quality barriers and improving alternative routes such the A229 and A2/M2 to make those routes more attractive and reduce traffic flows on the	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
		A228. The measures identified were, however, considered to be ineffective or undeliverable. However, it should be noted that that this does not alter the conclusion that for impacts on human receptors the Project is not considered to have a significant effect.	
Noise & Vibration	Concern over noise and vibration effects on Sundridge Hill, Pilgrims Way and Rochester Road (Ref 7.16 Community Impact Report [**APP-549**] p319. 7.1.42)	Within the scope of ES Chapter 12: Noise and Vibration, significant impacts relating to noise have been identified along each of these roads. These impacts relate to minor changes in road traffic noise that occur above a Significant Observed Adverse Effect Level (SOAEL) rather than relating to large changes in road traffic noise. Consideration is currently being given to mitigation measures that could be used to control these impacts, which were reported as Significant within the ES.	Matter Not Agreed

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2.7 Dartford Borough Council

Introduction

2.7.1 Dartford Borough Council is a neighbouring authority in respect of the application and as such is a category 'A' local authority under section 43 of the Planning Act 2008. It was notified under s42(1)(b) of the Planning Act, of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.7.2 The Applicant and Dartford Borough Council prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-123**]. The parties have worked collaboratively to update the SoCG, which has been submitted at DL 1.

2.7.3 Some of the Matters included in Dartford Borough Council's RR are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. These Matters are presented in Table 2.7, along with the applicable item number. New Matters raised in Dartford Borough Council's RR that were not included in the DCO Application SoCG are presented in Table 2.8.

Overview of matters raised in Dartford Borough Council's RR

Table 2.7 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Need for the Project	Need for the Project	2.1.1	n/a
Traffic and economics	Modelling Wider Network Impacts	2.1.5	
Wider Network Impacts	Wider Network Impacts approach	2.1.6	

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Table 2.8 New Matters raised in RRs, which have been included in SoCGs that were submitted at DL 1

Heading	Matter	The Applicant's response	Status
Traffic and economics	*The regular instances of congestion and lack of predictability of road conditions places a significant constraint on economic growth in the local area. Investment decisions to locate or expand in the area are deterred because of traffic conditions with development being constrained by the lack of capacity at Junctions 1a, 1b and the A2 junction. Access and egress from the Strategic Road Network is constrained and east west movement across the junctions is impeded. Employers find it difficult to recruit and retain staff because of the difficult journeys, whether by private vehicle or bus.*	**This matter has been added to the SoCG as item 2.1.11 where a detailed response is provided. In summary, the Applicant's response is as follows:** There would be traffic increases on some roads in the Dartford area. However, the Project would improve traffic conditions on many roads within the area, including the Dartford Crossing and its approach roads. The forecast impacts on the highway network as result of the Project including on M25 junction 2 (with the A2) and junctions 1a and 1b, are set out within Chapter 7 of the Transport Assessment [**Application Document APP-529**]. The Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**] and Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Level 3 Wider Economic Impacts Report [**Application Document APP-527**] set out the forecast economic impacts of the Project, which includes improved access to jobs for those living across the Lower Thames area.	Matter Under Discussion
	Planned mitigation for development includes improved public transport, however even the Fastrack bus service, which features significant sections of dedicated routeway, is	**This matter has been added to the SoCG as item 2.1.12 where a detailed response is provided. In summary, the Applicant's response is as follows:**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	compromised by the wider impacts and lack of resilience of Dartford's highway network.	The Project would improve traffic conditions on and around the Dartford Crossing, including the Local Road Network. The forecast change in traffic as a result of the Project is shown in Section 5.2 of Traffic Forecasts Non-Technical Summary [**Application Document APP-528**]. Forecast changes to public transport journey times are reported in Section 7.11 of the Transport Assessment [**Application Document APP-529**]. The Fastrack bus service is not forecast to see a change in its overall journey time that is greater than two minutes either faster or slower. During construction, impacts on traffic flows and public transport services would vary as set out in Chapter 8 of the Transport Assessment [**Application Document APP-529**]. The Fastrack bus service is not forecast to see a change of more than two minutes in its overall journey time during construction of the Project.	
	It is becoming increasingly difficult in planning determinations to reconcile the government's objectives for housing and employment growth in the area with the objective of keeping the Strategic Road Network performing adequately, or at 'nil detriment' as National Highways (NH) expects. Studies have shown that there are limitations to significantly increase the existing capacity of Dartford Crossing and impacts on the operation of the A282 junctions with 1a, 1b and 2 including surrounding strategic and local roads. Further pressure on the existing	**This matter has been added to the SoCG as item 2.1.13 where a detailed response is provided. In summary, the Applicant's response is as follows:** There would be increases on some roads in the Dartford area as drivers make use of the capacity relief that the Project would bring, including making cross river trips. Overall, the Project would have an overall benefit on roads within Dartford, as shown by the positive economic benefit of the Project.	Open

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Heading	Matter	The Applicant's response	Status
	road network in and around the Dartford Crossing is therefore likely to slow the planned growth in the area surrounding the crossing.	However, the Project would have an overall benefit on roads within Dartford, as shown by the positive economic benefit of the Project. The Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**] and Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Level 3 Wider Economic Impacts Report [**Application Document APP-527**] set out the forecast economic impacts of the Project, which includes improved access to jobs for those living across the Lower Thames area. The Project's approach to wider network impacts is set out in the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**].	

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2.8 Dover District Council

Introduction

2.8.1 Dover District Council was notified under s42(1)(b) of the Planning Act 2008 of pre-application and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.8.2 In 2022, the Applicant and Dover District Council prepared an SoCG. However, that document was not submitted as part of the DCO application by mutual agreement. Since then, the parties have worked collaboratively to produce an SoCG, which has been submitted at DL 1.

2.8.3 Some of the Matters included in Dover District Council's RR are the same or fundamentally similar to those addressed within the SoCG that was under development, but not submitted as part of the DCO application. These Matters are presented in Table 2.9, along with the applicable item number. New Matters raised in Dover District Council's RR that were not included in the SoCG are presented in Table 2.10.

Overview of matters raised in Dover District Council's RR

Table 2.9 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Need for the Project	Need for the Project	2.1.1	n/a
Route selection, modal alternatives and assessment of reasonable alternatives	Route selection	2.1.3	
Wider Network Impacts	Non-Project highway improvements	2.1.11 [Rule 6]	
	Non-Project highway improvements	2.1.12 [Rule 6]	

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Table 2.10 New matters raised in RRs, which have been included in the SoCG submitted at DL 1

Heading	Matter	The Applicant's response	Status
Planning Statement/policy	Dover District Council commented that its concerns would be likely to result in an unacceptable impact on highway safety and the residual cumulative impacts on the road network would be severe, with no mitigation identified or considered as part of this DCO, contrary to paragraphs 110 and 111 of the NPPF and local Development Plan policies.	**This matter has been added to the SoCG as item 2.1.2 where a detailed response is provided. In summary, the Applicant's response is as follows:** Paragraph 1.2 of the NPSNN makes it clear that the Secretary of State will use the NPSNN as the primary basis for making decisions on development consent applications for national networks NSIPs. Paragraphs 1.17 to 1.19 of the NPSNN clarify the position in respect of the NPPF which is not intended to contain specific policies for NSIPs though it has the potential to be an important and relevant consideration under paragraph 104(2)(d) of the 2008 Act. Section 7.3 of the Planning Statement explains that the Applicant has given due regard to the NPPF where it is relevant to do so in so far as it is important and relevant to the matter under consideration. Paragraphs 4.60 to 4.66 of the NPSNN deal with road safety and the measures Applicants are expected to employ in order to address appropriate road safety matters. The Applicant has demonstrated how it accords with paragraphs 4.60 to 4.66 of the NPSNN on pages 66 to 74 of Appendix A NPSNN Accordance Table to the Planning Statement. In many places the changes in traffic flows would lead to beneficial impacts on the	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		network, and in some cases, they would lead to adverse impacts. Overall, the benefits on the road network substantially outweigh the adverse impacts. The Applicant's approach to wider network impacts is set out in the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**]. WNIMMP monitoring measures would be legally secured through Requirement 14 in Schedule 2 to the draft DCO [**Additional Submission AS-038**].	
Traffic and Economics	*The SRN junctions within Dover District Council on the A2 are already overcapacity at Whitfield and Duke of York roundabouts, this has been acknowledged by NH and traffic modelling has confirmed this. The local plan and developments have been significantly held up over recent years due to needing to find a junction mitigation scheme to offset further increases in capacity on these junctions. Initial modelling identified a potential 10% increase at these junctions as a result of the LTC, this is significant and should not be screened out of the project assessment.*	**This matter was included in the SoCG as item 2.1.7 both as a new matter arising from the RR and to address the Examining Authority's request in its Rule 6 letter. In summary, the Applicant's response is as follows:** The Applicant has examined the model validation in the Dover area. The Applicant's transport model has 36 counts in this area and for each of the model time periods the total number of vehicles in the model compared to the counts is within 2%. The GEH statistic (an indicator of the 'goodness of fit') for these counts for each of the three modelled time periods and for cars, Light Goods Vehicles and Heavy Goods Vehicle categories, shows over 85% of sites pass the GEH and Design Manual for Roads and Bridges (DMRB) validation test for each vehicle type and time	Matter not agreed

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Heading	Matter	The Applicant's response	Status
		period. This shows that the base year model validates well in the Dover area. Please refer to the item below for further response on this matter.	
Traffic and economics	*There is evidence that congested roads lead to freight being unable to reach their destination in a timely manner and will have a negative impact on the commercial business for the Port of Dover, and the UK economy as a whole. Although the impact on the SRN (A2 and A20) has been modelled and tested, with the significance of these routes to the Port having been acknowledged, there are no road upgrades being proposed within the district.*	**This matter was included in the SoCG as item 2.1.8 and 2.1.9 both as a new matter arising from the RR and to address the Examining Authority's request in its Rule 6 letter. In summary, the Applicant's response is as follows:** The Applicant is bringing forward the Project in accordance with the policy requirements set out by the government in the Road Investment Strategy 2: 2020 – 2025 (Department for Transport, March 2020). The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks through a process explained in the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**].	Matter Under Discussion
Wider Network Impacts	*Significant concerns are raised that part of the A2 – Lydden to Dover is single carriageway creating a bottleneck effect for increased movements caused by the LTC. DDC have continually requested that the A2 needs to be upgraded to a dual carriageway.* *In the submission documents any upgrades to the SRN (A2) are identified for consideration under RIS3 proposals. There is currently no guarantee that the upgrades*	**This matter was included in the SoCG as item 2.1.10 both as a new matter arising from the RR and to address the Examining Authority's request in its Rule 6 letter.** **See item 2.1.8 for a response to this matter.** The Applicant will continue to engage with Dover District Council, to align national and local plans and investments, balance national	

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Heading	Matter	The Applicant's response	Status
	needed will be forthcoming as a RIS3 scheme and this is of strategic importance. DDC require any RIS3 scheme to be implemented alongside the LTC and need to ensure that the A2 upgrades are implemented.	and local needs and support better end-to-end journeys for road users.	
	DDC request improvements to the SRN to ensure that the LTC does not hinder DDC's housing growth agenda due to overcapacity at key junctions.	**This new matter was added to the SoCG as item 2.1.13. In summary, the Applicant's response is as follows:** The purpose of the Project is to meet the Scheme Objectives as set out in the Need for the Project [**Application Document APP-494**] which include the provision of traffic relief at the Dartford Crossing as well as providing new free-flowing north-south capacity across the River Thames. An assessment of the alignment of the Project with local and other relevant policies is presented within Appendix C to the Planning Statement [**Application Document APP-498**]. The Applicant will continue to engage with stakeholders in accordance with the licence obligations to work with others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users.	
Air quality			
	DDC fears that there would be an impact on the local community and the environment as congested roads would result in an increase in poor air quality.	**This matter was included in the SoCG as item 2.1.14 both as a new matter arising from the RR and to address the Examining Authority's request in its Rule 6 letter. In**	

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Heading	Matter	The Applicant's response	Status
		summary, the Applicant's response is as follows: The air quality assessment has been updated and is presented in Environmental Statement (ES) Chapter 5: Air Quality [**Application Document APP-143**] and has concluded that there are no significant effects on human health receptors. Furthermore, the Project does not delay compliance with the Air Quality Directive. No mitigation is therefore required in relation to these effects. The assessment has concluded that for some ecological designated sites and habitats, the impacts of the Project would be significant. Measures to reduce the impacts have been assessed and are reported in ES Appendix 5.6: Project Air Quality Action Plan [**Application Document APP-350**], in accordance with Design Manual for Roads and Bridges (DMRB) LA 105.	

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2.9 DP World Limited

Introduction

2.9.1 DP World Limited is the owner and operator of DP World London Gateway Port and DP World London Gateway Logistics Park on the north bank of the Thames Estuary in Stanford-le Hope, Essex. DP World Limited was notified under s42(1)(a) of the Planning Act 2008, of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.9.2 The Applicant and DP World London Gateway prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-101**]. At DL 1, the SoCG remains under development and parties expect that an updated SoCG will be submitted at a later examination deadline.

2.9.3 The Applicant has worked closely with DP World Limited in the development of the SoCG. DP World Limited has requested one additional matter be added to its the SoCG since application. This request did not emerge from DP World Limited's RR and was made during a technical meeting after RRs were submitted.

2.9.4 The matters included in the RR were the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. Table **2.11**, below, sets out those issues and provides references within that SoCG.

Overview of matters raised in DP World Limited's RR

Table 2.11 Matters raised prior to the RR Period and acknowledged within an SoCG to be submitted at a later deadline

Heading	Topic	Item No.	Link
Traffic and Economics	N/A	2.1.1, 2.1.2, 2.1.3, 2.1.4	[**Application Document APP-101**]

2.9.5 There were no new matters raised in the RR.

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2.10 Emergency Services and Safety Partnership Steering Group

Introduction

2.10.1 The SoCG with the Emergency Services and Safety Partnership Steering Group (ESSP SG) has been set up to confirm to the Examining Authority where agreement has been reached between the Applicant and ESSP SG and where agreement has not been reached. Where matters are yet to be agreed, the parties will continue to work proactively to reach agreement.

2.10.2 The group is made up of the following interested parties: Kent Police

d. Kent Fire and Rescue Service

e. Essex Police

f. East of England Ambulance Service NHS Trust

g. Essex County Fire and Rescue Service

h. South East Coast Ambulance Service NHS Foundation Trust

i. Metropolitan Police

2.10.3 The safety partners are the local authorities affected by the Project:

a. Thurrock Council

b. Gravesham Borough Council

c. Kent County Council

d. Essex County Council

2.10.4 In 2022, the Applicant and the ESSP SG prepared an SoCG. However, that document was not submitted as part of the DCO application by mutual agreement. Since then, the parties have worked collaboratively to produce an SoCG, which has been submitted at DL 1 .

2.10.5 It should be noted that following the Rule 6 Letter, the Examining Authority Requested that Essex Police should be engaged in an individual SoCG to explore locality specific Matters. Whilst Essex Police remain part of the wider ESSP SG their individual RR can also be found within this document in point 2.12 Essex Police.

2.10.6 Some of the Matters included in the ESSP SG RR are the same or fundamentally similar to those addressed within the SoCG that was under development, but not submitted as part of the DCO application. These Matters are presented in Table 2.12, along with the applicable item number.
New Matters raised in the ESSP SG RR that were not included in the SoCG are presented in Table 2.13.

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Overview of matters raised in the ESSP SG's RR

Table 2.12 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
DCO and Consents	Content of the draft DCO and control documents and supporting documents	2.1.1, 2.1.1a, 2.1.1b, 2.1.1c, 2.1.1d	n/a as the SoCG was not submitted at Application
	Security during construction	2.1.2, 2.1.3	
	Removeable barriers	2.1.4	
	Emergency area	2.1.5	
Consultation and engagement	Traffic Management Plans and Traffic Management Forum	2.1.10, 2.1.11	
	Protest plans	2.1.6, 2.1.7	
	British Automatic Fire Sprinkler Association consultation	2.1.8	
	Detailed tunnel design consultation	2.1.9	
	Traffic management plans and traffic management forum	2.1.10	
Design – roads, tunnels and utilities	Designing for safety and security	2.1.11	
	Provision for helicopter landing	2.1.12	
	Tunnel evacuation assembly areas	2.1.13	
	Tunnel cross-passages	2.1.14	
	Fixed fire fighting system	2.1.15	
Construction	Funding for co-ordination officer, Steering Group member officer time and service staffing and vehicles.	2.1.17, 2.1.19	
	Review of the impacts of the Project on the emergency services	2.1.16	
	Reimburse local authorities and emergency services	2.1.20	
Operation and maintenance	Emergency incident management/ response plans	2.1.21, 2.1.11, 2.1.10, 2.1.29	
	Emergency access roads provision	2.1.22	
	Emergency preparedness procedures – Communication equipment	2.1.23	
	Tunnel emergency access roadways	2.1.24	

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Heading	Topic	Item No.	Link
	Emergency services rendezvous point	2.1.25	
	Emergency hubs	2.1.26	
	Impacts on safety partners, emergency services and response times	2.1.27	
	Mitigation measures	2.1.28	
	Operational risk assessment	2.1.30	
	Cumulative effects with other developments	2.1.31	
Population and human health	Modern slavery, human trafficking and other hidden vulnerability and harm	2.1.32	
	Partner of Mates in Mind	2.1.33	
	Suicide prevention	2.1.34	
	Workforce health and wellbeing	2.1.35	

Table 2.13 New Matters raised in RRs, which are addressed in SoCGs submitted at DL 1 or are currently anticipated to be submitted at subsequent deadlines

Heading	Matter	The Applicant's response	Status
Consultation and engagement	*The ESSP Steering Group and the Applicant should work together towards a Statement of Common Ground covering the issues and recommendations set out in this response.*	The Applicant is working with the ESSP SG to work towards an agreed SoCG covering the issues and recommendations set out.	Matter Agreed
	Unfortunately, progress during 2022 to address the breadth of the 56 Recommendations in the September 2021 Consultation Response was generally slow. Some feedback was provided on the issue of Rendezvous Points for emergency services attending incidents on the project. However, very little by way of concrete evidence of changes to the scheme proposals and supporting documents (in draft form) was communicated to resolve other	The Applicant acknowledges that matters within the ESSP SG SoCG have not progressed as swiftly as either Party would have liked. In 2021 the Applicant provided initial responses to ESSP SG recommendations, which were included in a draft SoCG, developed with the group, prior to DCO Application. This SoCG was not submitted at DCO Application,	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	differences of opinion. Prior to the formal submission of the DCO proposals at the end of October 2022, the Steering Group had seen no amended plans or drawings, or revisions to the draft control documents and other key items –including the draft Order itself.	however the matters raised can be seen in the updated SoCG which has been submitted at DL 1. Prior to and since Application, the Applicant has attended regular, one-on-one, weekly meetings with the Consultant Representing the Group. The ESSP SG hold monthly steering group meetings, to which the Applicant is invited to attend the initial update segment. To aid discussion around matters important to the ESSP SG, (such as; rendezvous points, emergency hubs, provision of additional access, turnaround points, operational risk assessments, funding for ongoing engagement during the pre-submission phase), and progress the drafting of the SoCG, the Applicant suggests that their attendance at the Steering Group Meeting should be extended to include the duration of the discourse. The Applicant would welcome the opportunity to engage with the group both as a whole, and as individual organisations - with related yet sometime distinct requirements and needs.	

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2.11 Environment Agency

Introduction

2.11.1 The Environment Agency is an executive non-departmental public body, sponsored by the Department for Environment, Food and Rural Affairs, with the stated purpose "to protect or enhance the environment, taken as a whole". Within England, it is responsible for the following:

a. Regulating major industry and waste

b. Treatment of contaminated land

c. Water quality and resources

d. Fisheries

e. Some inland river, estuary and harbour navigations

f. Conservation and ecology

g. Managing the risk of flooding from main rivers, reservoirs, estuaries and the sea

2.11.2 The Environment Agency is a prescribed consultee under section 42(1)(a) of the Planning Act 2008 and schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and was notified of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.11.3 The Applicant and the Environment Agency prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-094**]. Since Application, the parties have worked collaboratively to update the SoCG, which has been submitted at DL 1.

2.11.4 The matters included in the RR were the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. Table 2.14, set out those issues and provides references within that SoCG.

Overview of matters raised in the Environmental Agency's RR

Table 2.14 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
DCO and Consents	Environmental Permits	2.1.1, 2.1.2	[**Application Document APP-094**]
	Flood Risk Activity Permits	2.1.3	
	Protective Provisions	2.1.7	

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Heading	Topic	Item No.	Link
	Tunnel Protection Zones	2.1.8	
DCO and Consents	Environmental Permits	2.1.1, 2.1.2	[**Application Document APP-094**]
	Flood Risk Activity Permits	2.1.3	
	Protective Provisions	2.1.7	
	Tunnel Protection Zones	2.1.8	
Terrestrial biodiversity	Impact	2.1.14, 2.1.15	
	Mitigation	2.1.16	
	Compensation and enhancement	2.1.18	
Marine biodiversity	Impact	2.1.20	
Material assets and waste	Impact	2.1.25	
Road drainage and water environment	Water Framework Directive	2.1.28, 2.1.29, 2.1.30, 2.1.31, 2.1.32, 2.1.34, 2.1.35	
	Hydrogeology and ground conditions	2.1.36, 2.1.37, 2.1.38, 2.1.40, 2.1.42, 2.1.45, 2.1.46, 2.1.47, 2.1.48, 2.1.49, 2.1.51, 2.1.52, 2.1.53	
	Flood Risk Assessment	2.1.54, 2.1.56, 2.1.59, 2.1.61, 2.1.62, 2.1.66, 2.1.68, 2.1.69, 2.1.70, 2.1.72	
Cumulative effects	Methodology and baseline	2.1.73	

2.11.5 There were no new matters raised in the RR.

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2.12 Essex County Council

Introduction

2.12.1 Essex County Council is a host authority in respect of the application and as such is a category 'C' local authority under section 43 of the Planning Act 2008. They were notified under s42(1)(b) of the Planning Act of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.12.2 The Applicant and Essex County Council prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-124**]. Since DCO Application, the parties have worked collaboratively to update the SoCG, which has been submitted at DL 1.

2.12.3 It was agreed that the revised SoCG submitted at DL 1 is an accurate description of the matters raised by Essex County Council, and the current status of each matter.

2.12.4 Many of the matters included in the RR were the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. Table 2.15 sets out those Matters and provides references within the SoCG. Essex County Council's RR also included new and existing Matters which have not been included within the SoCG and are being addressed through ongoing engagement with the Interested Party. These Matters are addressed in Table 2.16.

Overview of matters raised in Essex County Council's RR

Table 2.15 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic*	Item No.	Link
Need for the Project	Need for the Project	2.1.2	[**Application Document APP-124**]
Route selection, modal alternatives and assessment of reasonable alternatives	Route alignment	2.1.4	
Consultation and engagement	Adequacy of consultation	2.1.3	
Land and compulsory acquisition	Impacts	2.1.5	
Design – road, tunnels, utilities	Design, junctions	2.1.6 2.1.8	
Construction	Closures and diversions	2.1.12	
Traffic and economics	Public transport	2.1.14	
Wider Network Impacts	WNI approach	2.1.17	

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Heading	Topic*	Item No.	Link
Socio-economics	Skills Education and Employment (SEE) strategy development and supply chain, SEE strategy and supply chain	2.1.18-21	
Cultural heritage	Archaeology	2.1.23	
Population and human health	WCH / active travel – design, cross-river WCH and sustainable travel	2.1.25, 2.1.26, 2.1.28	

Table 2.16 New and existing matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Traffic and economics	*Orsett Cock Junction: Whilst this junction is within the Thurrock area, we share the concerns expressed by Thurrock on the future operations of this critical junction noting that the modelling indicates serious issues regarding the operation of the junction from completion of the project. We are currently reviewing this in detail but will require further assurances from National Highways on plans for this junction.*	The Applicant has provided a full explanation to Essex County Council of the modelled operation of the Orsett Cock junction to supplement the general data previously shared. The adverse impacts on Orsett Cock junction in 2030 have been assessed and are presented in Plates 7.25, 7.26 and 7.27 of the Transport Assessment [**Application Document APP-529]**and Transport Assessment Appendix D Scale of Impacts Maps [**Application Document APP-533**]. The Applicant considers that the junction performs acceptably, and that overall, the benefits on the road network would outweigh the adverse impacts, and this is reflected in the positive economic benefit of the Project as a whole and within Thurrock.	Closed

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2.13 Essex Police

Introduction

2.13.1 Essex Police is a territorial police force responsible for policing the county of Essex, in the East of England. Essex Police has been engaged throughout the Project by the Applicant through the Emergency Services and Safety Partners Steering Group (ESSPSG).

2.13.2 Following the Rule 6 and Rule 8 Letter, the Applicant has undertaken an individual SoCG with Essex Police to sit alongside the ESSPSG SoCG at DL 1.

2.13.3 Most of the issues raised in Essex Police's RR are represented within the draft SoCG as well as the ESSP SG's SoCG. Matters that have already been discussed with Essex Police through engagement with the ESSP SG are included in Table 2.17,along with references within that SoCG. New matters that have been raised in Essex Police's RR are presented in Table 2.18. There is also one new matter that is not included in the SoCG which is presented in Table 2-19.

Overview of matters raised in Essex Police's RR

Table 2.17 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Consultation an engagement	Protest	2.1.3	N/A
Design – Road, Tunnels, Utilities	Funding for service staffing and vehicles	2.1.5	
	Funding for the creation of a Police Traffic Management Officer	2.1.6	
	Construction workforce	2.1.7	
Operation and Maintenance	Emergency services rendezvous points	2.1.8	
Population and Human Health	Health and wellbeing	2.1.12	

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Table 2.18 New matters raised in RRs, included in the SoCG at DL 1

Heading	Matter	The Applicant's response	Status
National policy	Essex Police state that National Planning Policy Framework requires planning policies and decisions to achieve healthy, inclusive, and safe places, and to consider the support and delivery of local strategies to improve health (social and cultural) and wellbeing for all sections of the community.	The Applicant acknowledges the policies in Section 8 of the NPPF relating to the promotion of healthy and safe communities. The Planning Statement [**Application Document APP-495**] provides a comprehensive assessment against national planning policy including the NPSs which have effect and the NPPF insofar as it is a material and relevant consideration. See paragraphs 6.4.77 - 6.4.83 in relation to the NPSNN Assessment Principle relating to health which also cross refers to other relevant information in the application submission in the Health and Equalities Impact Assessment (HEqIA) [**Application Document APP-539**] and mitigation measures embedded within the application.	Matter Agreed
Local policy	Essex Police request the Applicant to consider the local policy, including the Essex Design Guide, relevant Traffic management considerations and Essex policing priorities stated in the PFCC Police and Crime plan 2021-2024 and the Essex Police Force Plan.	Planning Statement [Application Document APP-498] Appendix C Appendix C provides an assessment of the project against Local Authority planning policy so far as it is important and relevant under Section 104 of the Planning Act 2008. This does not specifically refer to the documents identified by Essex Police as they do not represent local authority planning documents, but the Applicant is aware of the guidance and is embedding, as far is reasonably practicable, the guidance within its approach to the delivery of the Project.	Matter Agreed

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Heading	Matter	The Applicant's response	Status
Designing for safety and security	Essex Police state that research has identified specific crime types which can potentially be 'designed out' and minimised, consequently preventing the need for future bespoke situational crime prevention measures. Embedding the concept of 'safety and security' throughout all proposals will ensure the longevity of the scheme, achieve sustainability aims and mitigate the opportunity for crime.	The Applicant is aware of the Essex Design Guide and is embedding, as far is reasonably practicable, the guidance within its approach to the delivery of the Project. Risk and security are key considerations within the design process. The Project has embedded the concept of 'safety and security' within design. These considerations will be taken forward to the detailed design stage. The Project will liaise with Essex Police through engagement with the Designing Out Crime Officers. It is a requirement of DMRB CD 352 that emergency services shall be consulted through the Tunnel Design and Safety Consultation Group on such issues as emergency services telecommunications equipment. The Applicant will discuss this matter further with Essex Police Designing Out Crime Officers.	Matter Under Discussion
Average speed systems	It is recognised the completion of the Lower Thames Crossing will bring significant benefits to the road networks currently provided in this area. To maintain road safety measures and ensure benefits are maximised it is suggested that where appropriate, the average speed systems in force during construction should remain as a legacy to the project and to assist the Safer Essex Roads Partnership (SERP) with	Safety is National Highways' first imperative. Similar to the SERP, National Highways' aim is that no one will be harmed when working or travelling on the strategic road network by 2040. Average speed systems should be reviewed during the construction period and consultation will take place with Essex Police as to whether it would be possible and appropriate to retain the average speed enforcement systems.	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	the aspiration of Vision Zero road deaths and serious injury by 2040.	The Applicant will discuss this matter further with Essex Police to address their outstanding query.	
Traffic management during construction	Essex Police request that consideration should be given to how vital road traffic restrictions will be managed and enforced during the construction phase on areas such as reduced speed limits or weight limit and prohibition of work(s) traffic.	The Outline Traffic Management Plan for Construction [Application Document APP-547] provides an overview of the approach that will be followed when undertaking temporary traffic management for the safe construction of the Project. These matters will be considered as part of the preparation of the Traffic Management Plan for the approval of the Secretary of State under Requirement 10 of the draft Development Consent Order [Application Document AS-38]. The Applicant will discuss this matter further with Essex Police to address their outstanding query.	Matter Under Discussion
Automatic Number Plate Recognition	Considering the prevention of crime and to enhance community safety, Essex Police believe that the Applicant should contribute to the costs of installing Automatic Number Plate Recognition (ANPR) systems on newly designed roads.	The Applicant will engage with Essex Police over the location of existing (if they require relocation) and future ANPR requirements to ensure ANPR equipment can be deployed where required. The Applicant will discuss this matter further with Essex Police to address their outstanding query.	Matter Under Discussion
Community engagement during construction	It is anticipated *the community disruption will lead to an increase in calls for service to Essex Police and partner Blue Light Services. To mitigate the impact in receiving misplaced calls we would seek confirmation that National Highways are*	National Highways has a commitment to develop a clear strategy to ensure communication and engagement is managed correctly. The Engagement and Communication Plan will be submitted by National Highways for	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	the central contact and community liaison for matters relating to the scheme… A clear contact strategy for this project will be required to ensure the citizen can obtain the correct service from National Highways.	acceptance and will include the points set out in Section 5.2.1 in the CoCP. The Contractor will engage with the local community, particularly focusing on those who may be impacted by the construction, including local residents, businesses, and landowners. The Communications and Engagement Plans would provide a programme of community engagement such as, but not limited to, community drop-in sessions, one-on-one meetings, newsletters, and leaflet drops (explaining forthcoming works). National Highways will work closely with relevant stakeholders on the membership of the proposed Community Liaison Groups (CLG), which will include representation from the local community. Attendance and membership will be published on the Project website and consideration must be given to including any feedback in newsletters and leaflets. This is outlined in the Outline Traffic Management Plan for Construction. The Applicant will discuss this matter further with Essex Police to address their outstanding query.	

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Table 2.19 New and existing matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Project aims	*We understand that the project will provide a new road connection between the A2 and M2 in Kent, via an under river crossing and join the M25 close to junction 29 and whilst the need, transport, safety, and user benefits are acknowledged, our review of the scheme indicates that significant impacts are likely to arise for Essex Police, particularly during construction phase of the development, which require appropriate mitigation and management as part of any Development Consent Order.*	In acknowledgement of the impacts during construction, the Applicant has set out in the Outline Traffic Management Plan for Construction [**Application Document APP-547**], an outline framework that would be applied for the design, management, road space booking and transport logistics for the Project. This has been developed following technical engagement with key stakeholders and provides a framework of principles and mechanisms that inform how detailed traffic management plans will be developed.	Open

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2.14 Forestry Commission

Introduction

2.14.1 The Forestry Commission is a non-ministerial government department responsible for the management of publicly owned forests, and the regulation of both public and private forestry, in England. The Forestry Commission was notified under s42(1)(a) of the Planning Act 2008, of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.14.2 The Applicant and the Forestry Commission prepared an SoCG that was submitted as part of the DCO Application [**Application Document APP-095**].

2.14.3 The Applicant has worked closely with the Forestry Commission in the development of the SoCG. The Forestry Commission has not wished to make any material changes to Matters within the SoCG since DCO Application. Therefore this SoCG will not be submitted at DL 1.

2.14.4 The matters are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on response to them. The following Table 2.20 sets out those issues and provides references within that SoCG.

Overview of matters raised in the Forestry Commission's RR

Table 2.20 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Planning Statement/Policy	Impact on ancient woodland	2.1.1	[**Application Document APP-095**]
Route selection, modal alternatives and assessment of reasonable alternatives	Utilities	2.1.3, 2.1.4	
Terrestrial biodiversity	Ancient woodland compensatory planting	2.1.5, 2.1.6, 2.1.7	
	Utilities	2.1.9	
	Mitigation	2.1.12	
	Biodiversity net gain	2.1.15	

2.14.5 There were no new matters raised in the RR.

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2.15 Gravesham Borough Council

Introduction

2.15.1 Gravesham Borough Council is a host authority in respect of the application and as such is a category 'B' local authority under section 43 of the Planning Act 2008. The council was notified under s42(1)(b) of the Planning Act 2008, of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.15.2 The Applicant and Gravesham Borough Council prepared an SoCG that was submitted as part of the DCO Application [**Application Document APP-125**]. Since DCO Application the parties have worked collaboratively to update the SoCG, which has been submitted at DL 1.

2.15.3 Some of the Matters included in Gravesham Borough Council's RR are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. These Matters are presented in Table 2.21, along with the applicable item number. New Matters raised in Gravesham Borough Council's RR that were not included in the DCO Application SoCG are presented in Table 2.22. Table 2.23 outlines Matters raised in the RR which are being addressed outside of the SoCG.

Overview of matters raised in Gravesham Borough Council's RR

Table 2.21 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Charging	Principle of Discounts for Local Residents	2.1.47	[**Application Document APP-125**]
	Timing and Approach to Equity (Dartford Crossing)	2.1.48	
Construction	Effects on Living Conditions / Habitability of Properties	2.1.25	
	Construction Workforce Effects on Accommodation	2.1.24	
	LRN Construction Access Points - Marling Cross	2.1.34	
	Use of the River - Local Road Network	2.1.27	
	Temporary Diversions of Highway during Construction	2.1.43	
Cultural Heritage	Mitigation: Cultural Heritage Mitigation Strategy	2.1.84	
DCO and Consents	Discharging Requirements	2.1.1	
	A2 junction	2.1.19	

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Heading	Topic	Item No.	Link
Design - Roads, Tunnels, Utilities	Width of Green Bridges (Thong Lane North and Brewers Road)	2.1.21	
EIA Methodology	Approach to EIA Regulations and DMRB	2.1.63	
	Comprehensive Monitoring Strategy	2.1.61	
	Comprehensive and Interactive Mitigation Strategy (LVIA, Biodiversity, Historic Environment)	2.1.62	
	Cumulative, In-Combination Impacts on Local Communities	2.1.67	
Landscape and Visual	Effects on the setting of the AONB	2.1.85	
	Effects on existing habitat replacement (Channel Tunnel Rail Link (CTRL))	2.1.102	
	Chalk Park	2.1.96	
Operations and Maintenance	Lack of Rest and Service Area in Project	2.1.44	
Planning Statement/Policy	Green Belt - Inappropriate Development in the Green Belt	2.1.4	
	Green Belt - Very Special Circumstances	2.1.5	
Population and Human Health	Consideration of effects on the Tilbury-Gravesend Ferry	2.1.110	
	NMU Crossing of the LTC/River	2.1.111	
	Construction Effects, Closures and Diversions of PRoW	2.1.108	
	PRoW access during construction	2.1.112	
	Effects on National Cycle Route 177 (NCR 177)	2.1.113	
	Timing, Form and Function of Replacement Open Space	2.1.107	
	Effects on Primary School Children (Construction)	2.1.114	
	Assessment of Cumulative Effects on Health	2.1.115	
	HIA Recommendations from Independent review - Monitoring	2.1.126	

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Heading	Topic	Item No.	Link
Road Drainage and the Water Environment	Cascading drainage attenuation ponds	2.1.137	
Route Selection, Modal Alternatives & Assessment of Reasonable Alternatives	Development in this alignment/location and general approach to consideration of reasonable alternatives	2.1.6	
	Opportunities to reduce car use	2.1.9	
	Alternative Design Parameters and Modes	2.1.7	
	Alternatives	2.1.8	
Socio-economic	Use of Local Labour	2.1.69	
	Implementation of SEE Measures	2.1.70	
	Southern Valley Golf Course	2.1.71	
	Effects on Cascades Leisure Centre	2.1.73	
	Shorne Woods Country Park (SWCP) Access	2.1.72	
Terrestrial Biodiversity	Utility Diversion effects on Ancient Woodland and Planting	2.1.103	
Traffic and Economics	Tilbury Junction Arrangement	2.1.56	
	Interpretation of DMRB Guidance	2.1.53	
	Compliance with EIA Regulations and Reliability of LTAM	2.1.54	
	Local Growth Assumptions	2.1.52	

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Table 2.22 New Matters raised in RRs, which are addressed in the SoCGs submitted at DL 1

Heading	Matter	The Applicant's response	Status
Climate	*The project is seeking to minimise its carbon footprint, but in a context where policy has changed dramatically since the route choice consultation in 2016. The project has a significant impact from both its construction (1.8 MtCO2e) and operation (4.9 MtCO2e over 60 year life including maintenance).* *The construction figure depends on achieving very ambitious targets which must carry a very high delivery risk. The operation metric is dependent on the achievement of Government decarbonisation goals, that on current progress look unlikely, and are not within National Highways direct control.* *Overall, this project is set in the context of the national carbon emissions, of which transport makes up 24% nationally, which is inappropriate as it fails to take into account the cumulative impact of all transport projects. The NPSNN having been approved in 2014 is clearly out of date from this point of view, no doubt to be rectified in the announced, but delayed, review.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.147 (DL 1)** **This is a Matter Under Discussion subject to Gravesham Borough Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** Despite the more recent policy announcements, new road building is still recognised as being necessary in both the Transport Decarbonisation Plan and the revised draft NPSNN issued in March 2023 (see paragraph 3.31). The Application includes ground-breaking new measures set out in the Project's Carbon and Energy Management Plan [**Application Document APP-552**]) which outlines 22 secured carbon commitments (see Appendix E), that would ensure the greatest likelihood of low carbon design, low carbon construction processes and low carbon material selection. Also, Appendix I to the Planning Statement, Carbon strategy and policy alignment [**Application Document APP-504**] sets out the Applicant's approach to reducing carbon emissions during the design, procurement, construction and operation of the Project. Table 15.17 of ES Chapter 15: Climate [**Application Document APP-153**] includes a conservative scenario which does not reflect existing net zero policy and electric vehicle uptake rates already achieved alongside two further scenarios demonstrating that the assessment is not dependent on the successful outcome of the policy.	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		In relation to the cumulative effects, the cumulative effects assessment for climate is detailed in Section 15.7 of ES Chapter 15: Climate [**Application Document APP-153**].	
	The Borough Council declared a climate emergency and has adopted a net zero target by 2050. *The GHG emissions during construction (2024-2030) and operation (2030-2050) will potentially add to the baseline of what the Council are seeking to reduce and will make our task harder overall within the confines of the Borough boundary.* *National policy can be expected to change in this area.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.151 (DL 1).** **This is a Matter Not Agreed.** The Applicant's position is that the Project will not impact on the council being able to achieve its carbon target, as the emissions from the strategic road network are not allocated by the Government to local authority carbon budgets.	Matter Not Agreed
Cultural Heritage	*The appraisal is confused in methodological terms and as to what guidance is being followed. As noted above the entire route in Kent is on land that historically formed part of the Cobham Estate. Dramatic change has occurred over time (e.g. development on the east side of Gravesend as well as the A2 itself), but this background supplies the historic framework for considering impact and future change, as set out in guidance. The area is rich in archaeological remains (especially along Watling Street).* *The village of Thong (Conservation Area with a number of non-designated buildings) is impacted by A122 to the west and proposed planting schemes around it, which will significantly alter its character as a settlement in open countryside framed by*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.152 (DL 1).** **This is a Matter Under Discussion subject to Gravesham Borough Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** The methodology for the assessment of impacts on cultural heritage set out in Section 6.3 Assessment and Methodology of ES Chapter 6: Cultural Heritage [**Additional Submission AS-044**] is robust, accurate and demonstrates accordance with policy. The Cobham estate is referenced throughout the relevant section of ES Chapter 6: Cultural Heritage [**Additional Submission AS-044**] (paragraphs 6.4.185 and 6.4.186) and ES Appendix 6.1 - Cultural Heritage Desk-based Assessment (1 of 4) [**Application Document APP-351**], in	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	woodland. The Milton construction site, CA3b, as shown in the plane could involve the towpath (NCN1/NG2) and the Thames & Medway canal (a non-designated heritage asset).	particular paragraphs 5.1.61 to 5.1.66, 5.4.18 to 5.4.23, 7.2.40 to 7.2.56 and 7.2.61. ES Appendix 6.15 - Master Gazetteer of Heritage Assets [**Application Document APP-373**] describes the Thong Conservation Area and the non-designated buildings (also in paragraphs 6.4.154 to 6.4.160 and assessed in paras 6.6.18, 6.6.22, 6.6.248 and paras 6.6.260 to 6.6.267 in ES Chapter 6: Cultural Heritage [**Additional Submission AS-044**]. The effects of the Project on the Thames and Medway Canal are assessed in ES Chapter 6: Cultural Heritage [**Additional Submission AS-044**] at paragraphs 6.6.25 and 6.6.295.	
	Considerable archaeological investigations have been carried out, with significant results, but this has not been done for the Southern Valley Golf Course or the areas of new planting proposed to compensate for ammonia deposition. *It is not therefore known whether these are deliverable in archaeological terms.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.153 (DL 1).** **This is a Matter Under Discussion subject to Gravesham Borough Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** Access for intrusive fieldwork was not possible at Southern Valley Golf Course. However, archaeological investigations in the form of a geophysical survey were carried out between November 2018 and January 2019. This is reported in Appendix 6.7 - Geophysical Survey Reports (1 of 2) [**Application Document APP-360**]. This geophysical survey, Appendix 6.1 - Cultural Heritage Desk-based Assessment (1 of 4) [**Application Document APP-351**], and the results of nearby archaeological trial trenching, reported in Appendix 6.8 - Trial Trenching Reports - Volume D (4 of 5) [**Application Document APP-365**] and Appendix 6.8 - Trial Trenching Reports - Volume E (5 of 5) [**Application Document APP-366**], provide	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		sufficient information for appropriate and deliverable mitigation. This is being developed with Kent County Council who are the archaeological advisors to Gravesham Borough Council and a draft mitigation strategy is presented in Appendix 6.9 - Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [**Application Document APP-367**]. Those areas identified for new planting proposed to compensate for ammonia deposition (referred to in the submission documents as Nitrogen Deposition Compensation Sites) were included within the wider area reviewed as part of the Appendix 6.1 - Cultural Heritage Desk-based Assessment (1 of 4) [**Application Document APP-351**] and are assessed within Environmental Statement - Chapter 6 - Cultural Heritage - (Clean) (Version 2) [**Additional Submission AS-044**]. Further geophysical surveys have been commissioned on the Nitrogen Deposition Compensation Sites and, in discussion with Kent County Council, further archaeological investigation may be carried out to inform the detailed design of the Nitrogen Deposition Compensation Sites to deliver appropriate planting (e.g. species-rich grassland) to avoid impacts on buried archaeology where this is confirmed to be present.	
DCO and Consents	*The scheme rests on the assumption that current cross channel vehicle and HGV flows seeking to go north of London from Kent will divert off the A20/M20 corridor onto the A2/M20 corridor. The A229 is a local Kent road which provides the shortest link between the M20 J6 and M2 J3 up Bluebell Hill.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.154 (DL 1).** **This is a Matter Not Agreed. In summary the Applicant's response is as follows:** Chapter 7 of the Transport Assessment [**Application Document APP-529**] identifies the potential adverse impacts on the A229. It also notes the beneficial journey	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
	No proposals are included in the application for improving this length of road or the two motorway junctions which are already over capacity at peak times. *For the scheme to work improvement to the A229 should be treated as Associated Development, since it is critical to linking the A2/M2 and M20/A20 corridors and providing relief at Dartford.*	time and reliability impacts on the network, notably at the Dartford Crossing. Kent County Council is currently developing a Strategic Outline Business Case seeking DfT funding for improvements to the A229 Bluebell Hill M2 and M20 junctions due to existing traffic flows in this location. Overall, the benefits on the road network would outweigh the adverse impacts, and this is reflected in the positive economic benefit of the Project as a whole, and within each affected local authority area. Monitoring of the impacts of the Project will take place as set out in the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**], which will help inform the development of future schemes to come forward in their own right.	
	The Development Consent Order and associated Control Documents err on the side of flexibility which fails to provide clarity and certainty that is needed, but can be addressed via the Requirements and a comprehensive monitoring strategy.	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.155 (DL 1).** **This is a Matter Not Agreed. In summary, the Applicant's response is as follows:** The Application accords with all relevant policy, guidance and advice (not least section 17 of Planning Inspectorate Advice Note Fifteen: Drafting Development Control Orders) and experience elsewhere, regarding the use of flexibility in the DCO and considers the approach which has been taken to be necessary, appropriate and proportionate, and provides sufficient clarity and certainty as sought by Gravesham Borough Council. The reasons for this are explained in paragraph 6.10.3 of the Explanatory Memorandum to the draft Development Consent Order [**Application Document APP-057**].	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
	Whilst National Highways have included a Section 106 Agreement Heads of Terms document (Application Document 7.3), this is very limited in scope primarily because National Highways only considered that an agreement would be drafted very late in the process. *As the Council has advised National Highways, it is consider that a much more comprehensive document is required.* *This is particularly pertinent to resolving some of the Principal Areas of Disagreement Summary Schedule and will need to be seen in combination with Development Consent Order itself and the other control documents.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.156 (DL--1).** **This is a Matter Under Discussion subject to further engagement and progression on the Section 106 Agreement. The Applicant's response, in summary, is as follows:** The Applicant's position is set out in paragraphs 1.1.2, 1.1.3 and 8.1.1 of the Section 106 Agreements – Heads of Terms report [**Application Document APP-505**].	Matter Under Discussion
EIA Methodology	*The submitted documentation provides a timeline for construction but this depends on the permission process not being delayed, the potential for judicial review and whether funding will be made available.* *The area has suffered from uncertainty in that regard since at least 2016.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.157 (DL 1).** **This is a Matter Not Agreed.** The Applicant considers that the position is clear as the draft Development Consent Order [Additional Submission AS-038] (Schedule 2) requires development to begin within five years of the date the Order comes into force. The programme assumptions set out in the Environmental Impact Assessment are indicative to enable a representative assessment of likely significant effects.	Matter Not Agreed
Geology and Soils	*The project in Kent the road sits mainly on chalk forming the North Downs, though the Shorne Wood/Ashenbank Wood/Cobham Park area with its woods are a mixture of sand and clays and other materials sitting*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.158 (DL 1).** **This is a Matter Under Discussion subject to Gravesham Borough Council's review of the**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	above that. These deposits result in a number of perched water tables as well as forming the overall landscape character, with woods on the clays etc. and open fields, on the chalk. *The North Kent marshes are river deposits underlain by chalk, where the critical element is the water table to support the wading bird population.* *This also means that construction in the AoNB is on more unstable material, quite apart from the need to avoid any impact on the stability of HS1 (186 mph max speed).*	**Applicant's position. In summary, the Applicant's response is as follows:** An assessment of the Project's effects on the underlying groundwater conditions is presented in ES Appendix 14.5 - Hydrogeological Risk Assessment [**Application Documents APP-458** and **APP-459**]. Section 10.4 of ES Chapter 10: Geology and Soils [**Application Document APP-148**] describes a full characterisation of ground conditions across the Order Limits, while ES Appendix 10.5 - Ground Model [**Application Document APP-426**] presents the Project's Ground Model as a geological long section. A Stability Report ES Appendix 10.2 [**Application Document APP-423**] demonstrates how land instability through geo-hazards and settlement have been addressed within the design and will continue to be managed by the Project through detailed design and construction. Necessary mitigation measures would be secured through Project commitment GS003 (Section 7 of ES Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan) [**Application Document APP-336**].	
Landscape and Visual	*The methodology used in the landscape assessment lacks clarity and is applied inconsistently.* *It is not clear how this relates to the overall impact of the scheme. As in other topic areas there is tendency to average the impacts rather than taking the worst as required by guidance. The major impact on the landscape is not mitigatable given the existing space and constraints, and some of*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.159 (DL 1).** **This is a Matter Not Agreed. In summary, the Applicant's response is as follows:** The methodology for the landscape and visual impact assessment is clearly set out in Section 7.3 of ES Chapter 7: Landscape and Visual [**Application Document APP-145**] and ES Appendix 7.2: Landscape and Visual	Matter Not Agreed

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	the major planting proposals round Thong go against the historical context. *The areas of planting proposed (including ammonia compensation areas) constitute a major change to the landscape in their own right which has not been assessed and have been in long term agricultural use.*	Assessment Methodology [**Application Document APP-377**] and has been appropriately applied to assess the realistic worst-case effects likely to arise from the Project. The assessment does not, as suggested, '*average the impacts*' of the Project. The worst-case effects are set out in ES Appendix 7.9: Schedule of Landscape Effects [**Application Document APP-384**] and Environmental Statement Appendix 7.10: Schedule of Visual Effects **[Application Document APP-385**]. Substantial areas of landscape mitigation have been proposed as part of the Project to the south of the River Thames, as shown on ES Figures 2.4: Environmental Masterplan Sections 1 & 1A [**Application Document APP-159**], Section 2 [**Application Document APP-160**], Section 3 [**Application Document APP-161**] and Section 4 [**Application Document APP-162**]. The effect of proposed landscape mitigation is reported in ES Appendix 7.9: Schedule of Landscape Effects [**Application Document APP-384**] and ES Appendix 7.10: Schedule of Visual Effects [**Application Document APP-385**].	
Noise and Vibration	*It is noted that there is a 60% increase in traffic flow on Henhurst Road, Cobham, including more HGVs, which raised issues on the impact on local roads, which needs monitoring.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.160 (DL 1).** **This is a Matter Not Agreed. In summary, the Applicant's response is as follows:** The Applicant acknowledges that there is predicted to be an increase in traffic flow along Henhurst Road by up to 250 PCUs in any one direction in each of the modelled time periods which is due to changes in the access onto the A2 corridor.	Matter Not Agreed

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		The approach to operational noise monitoring is outlined within paragraphs 12.8.5 to 12.8.8 of ES Chapter 12: Noise and vibration [**Application Document APP-150**].	
Operation and Maintenance	*The applicant claims that the project will increase the number of accidents due the length of new road, but that the rate of accidents will fall.* *The A122 is not proposed to be a motorway but is being designed to 'smart motorway' standards.* *That standard is now under review, with a moratorium on implementing such schemes, which if made permanent would have implications for this project.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.161 (DL 1).** **This is a Matter Not Agreed. In summary, the Applicant's response is as follows:** The Lower Thames Crossing is not affected by the decisions relating to smart motorways as it is an All-Purpose Trunk Road (APTR) and not a motorway or smart motorway. The Lower Thames Crossing is being designed to the requirements set out in National Highways' Design Manual for Roads and Bridges GD 300: 'Requirements for new and upgraded all-purpose trunk roads (expressways)', which introduces best-in-class safety design and technology interventions for a dual carriageway A-road. The Transport Assessment [**Application Document APP-529**] predicts that over the study area as a whole there would be a decrease in the number of accidents per vehicle kilometre driven, but due to the increase in the total number of vehicle kilometres driven as a result of the Project there is predicted to be an overall increase in the number of accidents.	Matter Not Agreed
Planning Statement/ Policy	*The proposal significantly constrains the options for possible future development on the east side of Gravesend not only from physical presence of the road itself but also from the extensive areas given over to planting and landscaping.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.162 (DL 1).** **This is a Matter Not Agreed. The Applicant's response, in summary, is as follows:**	Matter Not Agreed

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	This has resulted in the Council having to look at other potential sites elsewhere in the Green Belt to accommodate housing need, which may be more damaging than the east side of Gravesend. *The combination of SSSIs (including Ramsar/SPA), AONB and heritage assets significantly constrain the areas of search in the Borough.* *The disruption from the construction of the project may seriously constrain development delivery in the 2025-2030 period as well have long term implications on the capacity of some junctions.* *The Council is having to spend hundreds of thousands of pounds on transport modelling for the local plan.*	One of the Scheme Objectives is to "support sustainable local development and regional economic growth in the medium to long term". The Need for the Project [**Application Document APP-494**] (Chapter 5) demonstrates how this objective would be met by the Project and identifies beneficial as well as adverse impacts arising from the Project. Chapter 7 of the Transport Assessment (TA) [**Application Document APP-529**] identifies the potential adverse impacts on traffic flows across the Local Road Network with a consideration against policy requirements presented in TA Appendix F - Wider Network Impacts Management and Monitoring Policy Compliance [**Application Document APP-535**]. The effects from the adopted and emerging development plans have been included in the inter-project effects assessment presented in ES Chapter 16: Cumulative Effects Assessment [**Application Document APP-154**] and ES Appendix 16.2 Short List of Developments [**Application Document APP-484**]. ES Chapter 13: Population and Human Health [**Application Document APP-151**] provides an assessment of the Project on residential development land (sites or proposals identified in national or local plans, policies or strategies for development or land subject to planning permission) with Table 13.9 identifying no residential development land within the study area in Gravesham during the construction phase of the Project and Table 13.74 setting out the Applicant's assessment of the impacts during construction south of the River Thames. Appendix C - Local Authority Policy Review, of the Planning Statement [**Application Document APP-498**]	

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		provides an assessment of the Project against adopted and emerging Local Plan policies, including allocations.	
Road Drainage and the Water Environment	*The ground stabilisation tunnel, in particular at the Milton site where it comes to the surface, has the potential to have a major impact on the water table.* *The Ramsar/SPA is primarily for wading birds, to maintenance of appropriate hydrological conditions is essential.* *This includes the marsh drainage system that passes beneath the Thames & Medway Canal and the resilience of the soft flood defences. Water levels in the canal need to be maintained.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.163 (DL 1).** **This is a Matter Under Discussion subject to Gravesham Borough Council's review of the application materials referenced above.** In summary, the Applicant's position is as follows: Worst-case modelled groundwater drawdown maps are shown in Annex J of ES Appendix 14.5 - Hydrogeological Risk Assessment [**Application Document APP-458**]. The modelling assessment accounts for several measures and controls to reduce groundwater drawdown during the construction and operation of the ground protection tunnel and shafts. Paragraphs 6.5.3 to 6.5.6 summarise these measures, which are secured by Project commitments RDWE018a and RDWE018b in ES Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan [**Application Document APP-366**]. Project commitment RDWE017 of Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan [**Application Document APP-366**] requires that the Contractor would stabilise the ground to reduce ground movement during tunnelling. The proposed grouting, conducted from the ground protection tunnel, (or alternative, approved, methodology) would ensure the integrity of the River Thames flood defence embankment and the Thames and Medway Canal.	Matter Under Discussion

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	The technical issues involved are for Environment Agency, Kent County Council (as lead Local Flood Authority) and Port of London as appropriate to deal with. *The Flood Risk Assessment appears not to have considered all risks, as required by the NPSNN, and if the tunnels have 120 year life so should the assessment.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.164 (DL 1).** **This is a Matter Under Discussion subject to Gravesham Borough Council's review of the application materials referenced above – particularly how the Project's lifetime has been reflected in the flood risk assessment. In summary, the Applicant's response is as follows:** The Flood Risk Assessment (FRA) presented at ES Appendix 14.6 [**Application Documents** APP-460 to APP-477] is considered to be robust, having assessed all relevant sources of flood risk to the Project and arising from the Project. The Applicant has engaged extensively with the Environment Agency and with Kent County Council, as the Lead Local Flood Authority, in preparing the Flood Risk Assessment (FRA). The SoCG between National Highways and the Environment Agency [**Application Document APP-094**], confirms the Environment Agency's support for the content in the FRA and notes that they are unlikely to raise any objections based on the submitted information and discussions. Kent County Council is also in agreement with the measures proposed to manage local sources of flood risk, including surface water drainage. A detailed assessment of flood risk across the Project's lifetime taking into account future climate change is presented in Section 7.2 Part 6 of the FRA [**Application Document APP-465**].	Matter Under Discussion

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		An agreement to this approach is documented via items 2.1.62 and 2.1.63 in the SoCG between National Highways and the Environment Agency [**Application Document APP-094**].	
	The potential impacts from the construction process from surface run off given the size of land area involved are a concern.	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.165 (DL 1).** **This is a Matter Under Discussion subject to Gravesham Borough Council's review of the application materials referenced below. The Applicant's response, in summary, is as follows:** The impacts of construction of the Project on land drainage and the surface water runoff regime are assessed in Section 14.6 of ES Chapter 14: Road Drainage and the Water Environment [**Application Document APP-152**], which has been informed by the Project's Flood Risk Assessment presented in ES Appendix 14.6 - Flood Risk Assessment - Part 7 [**Application Document APP-466**]. As detailed in paragraphs 14.6.34, 14.6.42 and 14.6.49 of ES Chapter 14: Road Drainage and the Water Environment [**Application Document APP-152**], the assessment concludes that there would be no significant residual effects on these aspects during construction due to the range of good practice measures detailed in the Register of Environmental Actions and Commitments in ES Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan [**Application Document APP-336**] and secured within the draft Development Consent Order [**Additional Submission AS-038**].	Matter Under Discussion

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Terrestrial Biodiversity	*As an overall point the precise form of mitigation and compensation, and their connection back to impacts is not always clear.* *In particular is not transparent how some of the planting proposals relate to the impacts of the scheme.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.166 (DL 1).** **This is a Matter Under Discussion subject to Gravesham Borough Council's review of the application materials referenced above. In summary, the Applicant's response is as follows:** Section 8.6 – Assessment of likely significant effects, in ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] reports the potential effects of the Project on all relevant ecological receptors and details specific measures proposed, including planting and habitat creation. The creation of new areas of semi-natural habitat planting would offset those areas impacted as a result of the Project, the precise areas of which are detailed in Table 8.31 of ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**]. Their setting within the Project is illustrated in ES Figure 2.4 - Environmental Masterplan Sections [**Application Documents APP-159** to **APP-162**], and their long-term management is reported in the Outline Landscape and Ecology Management Plan [**Application Document APP-490**]. Further detail on specific mitigation measures is provided within the Register of Environment Actions and Commitments within ES Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan [**Application Document APP-336**].	Matter Under Discussion
Traffic and Economics	*Most of the traffic on the M25/A282 is going 'round' London in some sense, for which diverting east of Gravesend is a much longer trip and therefore unlikely to happen.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.167 (DL 1).**	Matter Not Agreed

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	The modelling shows the initial relief at the Dartford Crossing evaporates in 15 years, and based on past experience, when the toll booths were removed, will happen much faster than projected. *The problems at the Dartford Crossing highlighted in the objectives are not actually being addressed and will remain an issue.* *The Dartford Crossing was designed for 135,000 vehicles per day, it is now operating over capacity and is regularly used by over 150,000 vehicles per day.* *Thurrock Council's analysis of the official National Highways data shows that the proposed new crossing would take as little as 4% of traffic away in the morning peak hour, and 11% in the pm peak hour.*	**This is a Matter Not Agreed. In summary, the Applicant's response is as follows:** The Combined Modelling and Appraisal Report - Appendix C - Transport Forecasting Package [**Application Document APP-522**] shows the origin/destinations of traffic using the Dartford Crossing in the Do-Minimum (without the Project), in the Do-Something (with the Project) and for the Project itself. These show that very little traffic that uses the M25 as an orbital around London would divert to the Project as is suggested by the authority. The traffic forecasts set out in the Traffic Forecasts Non-Technical Summary [**Application Document APP-528**] in Table 5.1 show the forecast flows across both the Dartford and Lower Thames Crossings and that these flows would still be lower than if the Project had not been built. As set out in the Traffic Forecasts Non-Technical Summary [**Application Document APP-528**] at paragraph 5.2.11 part a, the Project's transport model forecasts that the average reduction in traffic during peak hours at the Dartford Crossing as a result of the Project would be 19% in 2030. The figures published by Thurrock Council and referenced in Gravesham's Relevant Representation, relating to the forecast relief that the Project would bring to the Dartford Crossing are not considered to be correct. As set out in the Traffic Forecasts Non-Technical Summary [**Application Document APP-528**] at paragraph 5.2.11 part a, the Project's transport model forecasts that the average reduction in traffic during the peak hours at the Dartford Crossing as a result of the Project would be 19% in 2030.	

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	Robustness has been claimed as a benefit, and objective, but there has been no substantive analysis of how the road network (M25/A282/A13/A2/A122) would function in the event of major disruption, since the current issues with the northbound tunnels at Dartford would largely remain. *Disruption, especially northbound at the Dartford crossing, regularly occurs and it is clear from the projected flow numbers that one crossing cannot accommodate the combined flow.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.168 (DL 1).** **This is a Matter Not Agreed. In summary, the Applicant's response is as follows:** The Applicant's 2019 incident data for the Dartford crossing shows that in 2019 the average duration of incidents at the Dartford Crossing was approximately 10 minutes (as stated in the Need for the Project [**Application Document APP-494**]). Full closures of the Dartford Crossing in either or both directions are extremely rare, therefore it will be a infrequent occurrence that one crossing would be expected to accommodate the combined flows (as set out in Combined Modelling and Appraisal Report – Appendix D – Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**]). The Project's up-to-date design would reduce the risk of incidents occurring. In addition, the tunnel for the Project has been designed as a Category A tunnel which can be used by vehicles carrying hazardous loads; it would have dual three-lanes which would enable it to accommodate higher and wider vehicles; and it has been designed as a free-flow addition to the road network and does not have closely spaced junctions (as set out in the Combined Modelling and Appraisal Report – Appendix D – Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**]). Traffic flows are forecast to reduce at the Dartford Crossing by an average of 19% in the peak hours as a result of the Project (as set out in the Traffic Forecasts Non-Technical	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
		Summary [**Application Document APP-528**]) which would reduce the likelihood and impact of incidents at Dartford and make the crossing more resilient.	
	The proposal rests on an economic case that claims benefits exceed disbenefits. *The BCR of this scheme has been declining as costs rise and can be expected to fall further as more appropriate mitigation and compensation requirements are included.* *The net result of the Environmental Assessment, Planning Statement and Appraisal Report is to seek to justify the scheme on the basis of the claimed public benefits whilst accepting that there are significant impacts for heritage, ecology, landscape and people etc.*	**This has been included in the SoCG between Gravesham Borough Council and the Applicant as Matter 2.1.169 (DL 1).** **This is a Matter Not Agreed. In summary, the Applicant's response is as follows:** The positive case for the Project is set out in the Need for the Project [**Application Document APP-494**]. The impacts of the Project and the benefits delivered are weighed in the planning balance as reported in Section 8.7 in Chapter 8 of the Planning Statement [**Application Document APP-495**] which concludes that there is 'a clear, overriding and compelling case in the public interest for the Project'. The economic appraisal is set out within Combined Modelling and Appraisal Report [**Application Document APP-518**], and in more detail within the Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**] and the Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Level 3 Wider Economic Impacts Report [**Application Document APP-527**]. The Environmental Statement - Non-Technical Summary (NTS) [**Application Document APP-486**] provides a summary of the impacts of the Project on a variety of environmental topics, including heritage, ecology, landscape, and population and human health.	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
		The Project has a series of Scheme Objectives which are set out in the Need for the Project [**Application Document APP-494**]. One of these is to "To support sustainable local development and regional economic growth in the medium to long term". Section 5.6 sets out how the Project supports the Scheme Objectives.	

Table 2.23 New and existing matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Material Assets and Waste	*The scheme aims to consume as much as possible of its spoil on site, with only the export of potentially contaminated waste and the import of structural fill for features such as the false cutting near Thong for which chalk is not a suitable material.*	This statement is noted and reflects the detail set out in ES Chapter 11: Material Assets and Waste [**Application Document APP 149**].	Matter Agreed
Noise and Vibration	*Our consultants advise that methodology employed is in principle sufficient to address the potential issues, with the caveat over the inadequacy of the transport modelling.*	The Project's transport model has been produced in line with DfT guidance (Transport Analysis Guidance (TAG)) as set out in the Combined Modelling and Appraisal Report [**Application Document APP-518**]. The Applicant has engaged with the authority to understand their concerns regarding the Project's transport model on a number of occasions and has shared detailed outputs to enable the authority to gain an understanding of the forecast impacts of the Project on the road network.	Matter Agreed (noise and vibration methodology) Matter Not Agreed (inadequacy of transport modelling)

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Heading	Matter	The Applicant's response	Status
		Matters relating to the traffic model have been covered through Matters 2.1.52 to 2.1.56 in the SoCG between Gravesham Borough Council and the Applicant. This engagement will continue during the Examination of the Project with updates reflected in the SoCG between the Applicant and the authority.	
	A significant change from the 2022 consultation in the submitted DCO has been the removal of the proposed noise barriers, and reliance placed instead on a low noise surface, which is supposedly 7.5 dB quieter. *This type of surface decays with time, precise rate depending on the actual material used, implying that it will need to be replaced about every 10 years and that it is properly maintained so as to remain effective.* *The effectiveness of this approach requires clarification in the real world.*	The Applicant considers that the removal of the proposed noise barrier from the Project is fully justified and that this has now been clarified through joint engagement between the Applicant, Gravesham Borough Council and Kent County Council via a workshop on 15 February 2023. As set out in Matter 2.1.56 of Kent County Council's SoCG with the Applicant, it has been confirmed that by introducing a higher standard of low-noise road surfacing, the previously proposed acoustic barriers were removed in this location, which also led to a reduction in the visual impact of the barriers. This change responds to visual concerns raised by Kent Downs AONB Unit. **That Matter refers to evidence contained in the following Application Documents:** Section 12.5 of ES Chapter 12: Noise and vibration [Application Document APP-150]. ES Appendix 12.10 - Road Traffic Noise Mitigation and Cost Benefit Analysis [Application Document APP-450]. ES Appendix 2.2 Code of Construction Practice (CoCP), First Iteration of	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		Environmental Management Plan [Application Document APP-336]. ES Figure 12.6 - Operational Road Traffic Noise Mitigation [**Application Document APP-314**].	
Traffic and Economics	*When the crossing opens there will be additional capacity across the river (projected to be increase by 54% in pcu flow terms in 2045), but it is clear that much of the traffic is to/from the A2/M2 corridor (and M20/A20) further east. Due to the constraints of Green Belt, Nature Conservation, Heritage,and Landscape there are no large areas of land for release in Gravesham.* *There is no equivalent to the Tilbury Freeport extension for example. So the journey to work area (in and out commuting) will expand, based on the use of cars, in contradiction to carbon reduction goals. Further it is not clear what sort of jobs will be on offer and whether they match the Gravesham labour market.* *Existing permitted or allocated development already has to have a robust transport strategy without the Lower Thames Crossing, since it cannot be assumed (or in some cases long proceed it).*	The Applicant notes these comments and agrees that the cross-river capacity and average length of trip in the Lower Thames area would increase as a result of the Project. The implications of this for greenhouse gas emissions are set out in Section 15.6 of 6.1 ES Chapter 15: Climate [**Application Document APP-153**]. The Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Level 3 Wider Economic Impacts Report [**Application Document APP-527**] sets out the wider economic benefits of the Project, including changes to the job market that would see some residents of Gravesham make use of the Project to access new opportunities; and vice versa for those who reside north of the River Thames. The Community Impact Report [**Application Document APP-549**] presents the forecast socio-economic changes for a number of wards in Gravesham, presenting the forecast changes to the number of jobs within a 30 or 60-minute drive.	Matter Under Discussion

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2.16 Higham Parish Council

Introduction

2.16.1 Higham Parish Council is a civil parish and electoral ward in the Borough of Gravesham in Kent, England. The village lies just north-west of Strood, in the Medway unitary authority, and south-east of Gravesend. Higham Parish Council is a prescribed consultee for the Project under s42(1)(a) of the Planning Act 2008.

2.16.2 The Applicant and Higham Parish Council prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-134**]. Since Application, the parties have worked collaboratively to update the SoCG, which has been submitted at DL 1

2.16.3 The matters included in the RR were the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. Table 2.24, sets out those issues and provides references within that SoCG.

Overview of matters raised in Higham Parish Council's RR

Table 2.24 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Route selection, modal alternatives & assessment of reasonable alternatives	Route selection	2.1.1	**Application Document APP-134**]
Climate	Loss of agricultural land	2.1.43	
Wider Network Impacts	Local Wider Network Impacts	2.1.26, 2.1.27 and 2.1.29	
Design – Road, Tunnels, Utilities	Junction	2.1.3 and 2.1.5	
	Safety	2.1.7	
Construction	Construction traffic impacts	2.1.8, 2.1.13, 2.1.18 and 2.1.19	
Construction	Mitigation	2.1.10	
Operation & maintenance	Smart motorway systems	2.1.20	
Air quality	Project design and mitigation	2.1.32	
	Assessment of likely significant effects	2.1.34	
Terrestrial biodiversity	Mitigation	2.1.37	
Material assets and waste	Assessment methodology	2.1.40	

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2.17 High Speed 1 Limited

Introduction

2.17.1 High Speed 1 is a key Stakeholder in respect of the application and the Applicant is seeking to reach Agreement via SoCG's and Protective Provisions.

2.17.2 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.

2.17.3 The Applicant and High Speed 1 Limited prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-110**].

2.17.4 Whilst the Applicant worked closely with High Speed 1 Limited in the preparation of the SoCG, High Speed 1 Limited has not yet been able to complete their review of the SoCG in line with their governance process. The SoCG submitted at DL 1 is therefore presented as the Applicant's understanding of the status of discussions with High Speed 1 Limited.

2.17.5 The matters raised in the RR were the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. Table 2.25 sets out those issues and provides references within that SoCG.

Overview of matters raised by High Speed 1 Ltd RR

Table 2.25 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Consultation and Engagement	Consultation information	Appendix A - A.1	[**Application Document APP-110**]
Land & Compulsory acquisition	West of Singlewell Infrastructure Maintenance Depot	2.1.2	
Design – Road, Tunnels, Utilities	Critical Infrastructure – NGET and UKPN & use of UTX's	2.1.5 – 2.1.6	
Construction	Construction Methodology & limitations	2.1.8	
Operation & Maintenance HS1 Infrastructure	EVP, Surcharging & Road Signage	2.1.9 – 2.1.12	
Terrestrial Biodiversity	South of Singlewell Maintenance Deport & Church Road	2.1.14	
Protective Provisions	Legally binding obligations & Consent to exercise DCO powers	2.1.7 – 2.1.8	

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2.18 Historic England

Introduction

2.18.1 Historic England is the Government's adviser on all aspects of the historic environment in England, including historic buildings and areas, archaeology, and historic landscapes. Historic England is a statutory consultee in respect of the application under section 42 of the Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010. Under s42(1)(a) of the Planning Act 2008, Historic England was notified of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.18.2 The Applicant and Historic England prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-096**].

2.18.3 While the Applicant has worked closely with Historic England in the preparation of the SoCG, Historic England has not yet been able to complete its review of the SoCG in line with its governance process. The SoCG is therefore presented as the Applicant's understanding of the status of discussions with Historic England and is presently unsigned. This SoCG was submitted at DL 1.

2.18.4 The matters raised in Historic England's RR are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them. The Table 2.26 sets out those issues and provides references within that SoCG.

2.18.5 Further to the matters outlined in Table 2.26, Historic England requested that SoCG item 2.1.22 be separated out into three separate matters. While the information within these matters has not changed, this has led to new matters being included in the SoCG submitted at Examination DL 1. These matters summarised in Table 2.27.

Overview of matters raised in Historic England's RR

Table 2.26 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Cultural heritage	Archaeological remains	2.1.14, 2.1.15	[**Application Document APP-096**]
	Historic buildings	2.1.17, 2.1.18, 2.1.19, 2.1.22	
	Geoarchaeology and palaeolithic archaeology	2.1.26	
	Cultural heritage and utilities	2.1.33	
	Heritage mitigation	2.1.36, 2.1.37, 2.1.38	

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Table 2.27 New Matters raised in RR, which are addressed in the SoCG submitted at DL 1

Heading	Matter	The Applicant's response.	Status
Cultural heritage	Historic England expressed concern and requested justification for the substantial harm or total loss of significance of '1 & 2 Grays Corner'.	**This will be added as a new matter in the SoCG as 2.1.42 (DL 1) under 'Cultural heritage'.** No new information is included within this matter. It is derived from existing matter 2.1.22, but has been separated out at the request of Historic England for clarity and ease of discussion.	Matter Under Discussion
	Historic England expressed concern and requested justification for the substantial harm or total loss of significance of 'Murrells Cottage'.	**This will be added as a new matter in the SoCG as 2.1.43 (DL 1) under 'Cultural heritage'.** No new information is included within this matter. It is derived from existing matter 2.1.22, but has been separated out at the request of Historic England for clarity and ease of discussion.	Matter Under Discussion
	Historic England expressed concern and requested justification for the substantial harm or total loss of significance of 'Thatched Cottage'.	**This will be added as a new matter in the SoCG as 2.1.22) under 'Cultural heritage'.** No new information is included within this matter. It is derived from existing matter 2.1.22, but has been separated out at the request of Historic England for clarity and ease of discussion.	Matter Under Discussion

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2.19 ITS Technology Group Limited

Introduction

2.19.1 ITS Technology Group Limited (ITS) is a telecommunications company with assets within the Project's Order Limits.

2.19.2 The Applicant and ITS prepared an SoCG that was submitted at DCO application [Application Document APP-112]. Since the DCO Application was made the parties have worked collaboratively to update the SoCG, which has been submitted at DL 1

2.19.3 The RR consisted of one new matter that has been resolved outside of the SoCG and Table 2.28 summarises this and provides the Applicant's response.

Overview of matters raised in ITS' RR

Table 2.28 New Matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Change of name	The company formerly known as NextGenAccess Ltd (NGA) is now known as ITS Technology Group Ltd.	Noted. The relevant application documents have been changed to reflect this.	Closed

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2.20 Kent County Council

Introduction

2.20.1 Kent County Council is a host authority in respect of the application and as such is a category 'C' local authority under section 43 of the Planning Act 2008. As a county council, it is the highway authority for non-strategic roads and holds responsibilities including strategic planning, transport planning, waste management, environment, and public health within its boundary. Kent County Council works with other highway authorities to manage interfaces between their highway networks and liaises closely with district and borough councils on planning issues.

2.20.2 The Applicant and Kent County Council prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-126**]. Since DCO Application the parties have worked collaboratively to update the SoCG, which has been submitted at DL 1.

2.20.3 Many of the matters included in the Kent County Council RR were the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. Table 2.29 sets out those issues and provides references within that SoCG. However, there are some new matters raised in the RR that were not included in the DCO Application SoCG and these are presented in Table 2.30.

Overview of matters raised in Kent County Council's RR

Table 2.29 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Reference	Link
Construction	Maintenance of Green Bridges and Transfer of Assets	2.1.12	[**Application Document APP-126**]
	Construction Traffic Impacts ('rat running')	2.1.10	
	Road Asset Maintenance	2.1.8	
Cultural Heritage	Methodology: Assessment of undesignated assets Impact on Heritage Assets	2.1.40 2.1.42	
	Archaeological Impacts of Proposed Mitigation Nitrogen Deposition and Cultural Heritage	2.1.43 2.1.87	
Population and Health	HEqIA - Assessment HEqIA - Air Quality and Health Inequalities	2.1.60 2.1.61	
	Cross-river provision for walking and cycling	2.1.57 2.1.58 2.1.18	

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Heading	Topic	Reference	Link
	Cross-river provision for public transport Public Transport use During Construction		
Socio-economics	Shorne Woods Country Park (SWCP) Access Effects on community assets/facilities	2.1.32 2.1.34	
	Local workforce and supply chains – Principle Local workforce and supply chains – Detail and further engagement	2.1.30 2.1.31	
Terrestrial Biodiversity	Mitigation: Management of Effects / Ecology Working Group	2.1.52	
	Mitigation: Management of Effects / Ecology Working Group Compensatory Land Arrangement – Principle	2.1.52 2.1.95	
Various	Rest and Service Area (RASA) Provision Nitrogen Deposition and De-carbonisation options Cross-river provision for walking and cycling Cross-river provision for public transport	2.1.15 2.1.91 2.1.57 2.1.58	
Wider Network Impacts Traffic and Economics	Principle of Approach to Significant Effects and Mitigation Specific Links and Junctions Mitigation (Principle): Policy Compliance	2.1.25 2.1.26 2.1.28	

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Table 2.30 New Matters raised in RR, which are addressed in the SoCGs submitted at DL 1

Heading	Matter	The Applicant's response	Status
Construction	*KCC welcomes the measures National Highways are proposing to reduce the scheme's construction impact on the LRN, including on-site accommodation, a shuttle service, subsidised or discounted public transport tickets and funding to draw down should targets be exceeded.* *However, further detail is required to ensure these are appropriate and fully secured as a requirement of any consent granted*	**The issue has been referred to in the Statement of Common Ground between Kent County Council and the Applicant as part of Matters 2.1.99 (DL 1) and 2.1.104 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** The Framework Construction Travel Plan (FCTP) [**Application Document APP-546**] would be secured through Requirement 11 (Part 1 of the draft DCO Schedule 2) [**Additional Submission AS-038**] and includes commitments to shuttle bus services and exploration of subsidised or discounted public transport tickets. The Applicant considers that there is sufficient detail within the FCTP at this stage; with further detail to be set out once the Contractors are appointed and the workforce known.	Matter Under Discussion
	The DCO proposes to prohibit HGV movements on several local routes but KCC requests a number of additional routes are prohibited for HGVs (and some designated unsuitable routes for staff). *The Travel Plan (APP-546) should also encourage all staff to travel on KCC-preferred routes*	**The issue has been referred to in the Statement of Common Ground between Kent County Council and the Applicant as part of Matters 2.1.102 (DL 1) and 2.1.103 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		Applicant's position. In summary the Applicant's response is as follows: The proposed indicative restrictions for HGVs associated with the construction of the Project have been developed through collaboration and discussions with local authorities and stakeholders. Further detail is set out in paragraphs 4.6.3-4.6.4 and Table 4.4 of the outline Traffic Management Plan for Construction [**Application Document APP 547**]. The oTMPfC identifies a number of illustrative/indicative logistics routes, taking a risk-based approach to choosing and implementing routes that would form part of TMPs, dependent on several factors including but not limited to traffic counts, types of, traffic, WCH interface, nearby points of interest (e.g. schools) and will include engagement with relevant authorities. It is noted that most of the routes identified by Kent County Council as needing to be prohibited from use by the Project's construction vehicles, are already identified as prohibited and this is secured by the oTMPfC (Table 4.4). Of the 10 routes identified by Kent County Council, five have been prohibited (Castle Lane; Lower Higham Road between Green Farm Lane and A226; Thong Lane; Pear Tree Lane/The Ridgeway, Brewers Road between Park Pale and A226; The Street). Kent County Council will be part of the consultation on adoption of Traffic	

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Heading	Matter	The Applicant's response	Status
		Management Plans and will therefore be able to contribute to the detail of further restrictions I considered necessary. The Framework Construction Travel Plan [**Application Document APP-546**] sets out how the Project would seek to reduce the impact of its construction workforce on the road network by reducing the number of single-occupancy vehicle trips and encouraging the uptake of sustainable and active modes of travel.	
	Journey time delays on public transport have been identified during the significant six-year construction period, yet no mitigation has been proposed. Mitigation is key to ensure this mode remains a viable and reliable alternative to the private car, to both maintain patronage and provide a sustainable option that could reduce congestion in the area. *KCC is currently reviewing the impact of the various road closures and diversions during the construction phases on the bus routes identified in the TA (APP-529) to propose a mitigation package for National Highways to implement.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.108 (DL 1) (which refers to additional information subsequently provided to the Applicant by Kent County Council).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** Section 8.9 of the Transport Assessment (TA) [**Application Document APP-529**], outlines the forecast impacts on public transport during the construction period. Mitigation is proposed as part of the DCO in a number of documents, including in Section 10.1 of the TA and the outline Traffic Management Plan for Construction [**Application Document APP-547**] which details the mechanisms which would be in place to allow for discussions to take place on	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		matters such as appropriate mitigation for public transport impacts during construction. The Applicant welcomes continued engagement and mitigation proposals from Kent County Council that can be discussed and explored before construction commences and during the construction via the Traffic Management Forum (TMF).	
Cultural Heritage	*Historic England and Gravesham Borough Council's Conservation Officer will be providing detailed comments on built heritage, but it is unclear how the assessment (APP-150) has concluded vibration impacts during construction will have no significant impact on built heritage.* *Clarification is needed on this.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.110 (DL 1).** **The Applicant considers that this is a Matter Agreed. The reason is summarised below:** Section 6.6.10 of Environmental Statement (ES) Chapter 6: Cultural Heritage [**Additional Submission AS-044**] describes the assessment methodology for the impact of vibration from piling during construction of the Project on any built heritage asset. Physical damage is likely to occur to built heritage assets at a predicted peak particle velocity of 12.5mm/s. At a predicted peak particle velocity of less than 2mm/s the impact of vibration from piling or a tunnel boring machine (TBM) is negligible.	Matter Agreed
	There is a lack of consistency within the DCO documentation. For example, the defined 'project areas' and archaeological mitigation works (field evaluation, archaeological excavation etc) outlined in Chapter 2 (Project Description) of the	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.112 (DL 1)**	Matter Agreed

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Heading	Matter	The Applicant's response	Status
	Environmental Statement (APP-140) does not appear, for example, to be consistent with the areas defined in the draft AMS-OWSI (APP-367). *In addition, there are other areas of the documentation which also require clarity and additional content.*	**The Applicant considers that this is a Matter Agreed. The reason is summarised below:** To clarify - Kent County Council believed that the Operational Sections set out in Section 2.3 of the ES Chapter 2: Project Description [**Application Document APP-140**] in Table 2.2 were the basis of Section 6.3, Archaeological mitigation by construction zone in Appendix 6.9 Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [**Application Document APP-367**]. When Appendix 6.9 is updated it has been agreed with Kent County Council that the term Construction Zone will be changed to Construction Section and the paragraphs within the Project Description [**Application Document APP-140**] will be referenced.	
	Chapter 6 of the Environmental Statement (APP-144) fails to clearly identify how values have been calculated for certain individual heritage assets and, whilst the proposed mitigation may be appropriate, KCC would like clarification on this and to discuss this further with the applicant to understand the proposals and ensure the best possible outcomes. *These will need to be secured through the DCO*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.111 (DL 1)** **The Applicant considers that this is a Matter Agreed. The reason is summarised below:** The assessment methodology has been set out in Section 6.3 of ES Chapter 6: Cultural Heritage [**Additional Submission AS-044**]. Paragraph 6.3.1 lists the standards and guidance, both national and regional, used by	Matter Agreed

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Heading	Matter	The Applicant's response	Status
		the Applicant to guide the assessment of value of heritage assets. The Applicant is continuing to have further discussions with the Archaeology and Heritage team at Kent County Council and their counterparts north of the River Thames. This approach is ongoing and ensures that Kent County Council is involved in developing an agreed approach to mitigation.	
	KCC requires clarification on the proposals for landscape and planting mitigation areas, including Chalk Park, and the impact of these on the historic landscape of the area and the setting of, and ability to appreciate relevant heritage	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.109 (DL 1).** **The Applicant considers that this is a Matter Agreed. The reason is summarised below:** Those heritage assets directly affected by the creation of Chalk Park are identified in paragraph 6.6.49 of ES Chapter 6: Cultural Heritage [**Additional Submission AS-044**]. The Grade II* listed Church of St Mary (LB27) has been identified as being potentially affected by the creation of Chalk Park and this is discussed in paragraph 6.6.280. ES Appendix 6.9 - Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [**Application Document APP-367**] will be revised and will be reported through the SoCG process.	Matter Agreed
	Non-designated organic deposits and remains of possible national importance that owe their significance to waterlogging are not adequately	**The matter has been included in the Statement of Common Ground between**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	considered in the Environmental Statement nor in the draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) (APP-367). *Baseline monitoring for the hydrological environment of areas of impact is required to allow a model to be developed which can then be considered in relation to development proposals and so that appropriate mitigation by design and/or remedial works can be agreed upon*	**Kent County Council and the Applicant as Matter 2.1.139 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. The reason is summarised below:** The archaeological trial trenching did not reveal areas of extensive waterlogging. A summary of the results of the archaeological trial trenching across Kent is provided in Section 4 of Appendix 6.9 - Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [**Application Document APP-367**] paras 4.2.1 and 4.2.57, and in full in Appendix 6.8 - Trial Trenching Reports - Volume D (4 of 5) [**Application Document APP-365**] and Appendix 6.8 - Trial Trenching Reports - Volume E (5 of 5) [**Application Document APP-366**]. Appendix 14.5 - Hydrogeological Risk Assessment (Part 1 of 2) [**Application Document APP-458**] sets out the baseline hydrogeological conceptual model for the whole Project. Section 5.2 covers 'South of the Thames' and a summary is presented in Table 5.1. A summary of the Project impacts on groundwater levels and flows is presented in Table 6.6 which reports that there will be no change or a negligible change. Therefore, the Project concluded there would be no impact on non-designated organic deposits or remains of possible national importance through changes in groundwater.	

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Heading	Matter	The Applicant's response	Status
DCO and Consents	*National Highways states the Control Plan (referenced in APP-003), which is effectively the mitigation 'route map', is a non-statutory framework of documents, some of which are in the application and others which will be completed as secured by DCO requirements following consent.* *However, there is a clear gap in the DCO in terms of implementation of mitigation and the relationship of the documents identified within the Control Plan is not clear*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.115 (DL 1).** **The Applicant considers that this is a Matter Not Agreed. The reason is summarised below:** The Control Plan is legally secured by draft DCO Schedule 2 [**Additional Submission AS-038**]. By way of example, mitigations measures identified for construction are set out in the Code of Construction Practice (CoCP), which is to be legally secured through draft DCO Schedule 2 Requirement 4 and delivered through Environmental Management Plan 2 (EMP2), which is required to be substantially in accordance with the CoCP. As noted by the representor, the Control Plan is described as a 'mitigation route map' or a framework for mitigating, monitoring and controlling the effects of the Project. It is presented in Plate 1.1 (and Plate 14.1) in the Introduction to the Application [**Application Document APP-003**]. Section 14 describes the Control Plan or 'mitigation route map'. Table 14.1 explains where, in the DCO, the provision of each document identified in the Control Plan is legally secured and the process and stage in the delivery of the Project when they will be	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
		secured (during both the construction and operational phases of the Project). The rest of Section 14 of the Introduction to the Application [**Application Document APP-003**] provides a detailed explanation of the purpose and process of preparation of each individual Control Plan document. The Applicant considers that this provides a clear relationship between the control documents submitted as part of the application and their implementation through the DCO.	
	The discharge of requirements under the DCO will also place a very considerable resource burden on KCC as a relevant highway authority. KCC seeks a mechanism that ensures National Highways will reimburse KCC with the costs of resourcing this additional work. *This in not currently clear within the draft DCO and other documents*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.116 (DL 1).** **This is a Matter Under Discussion subject to further engagement on drafting of the draft DCO.** **The reason is summarised below:** The Applicant recognises the concern raised by Kent County Council and is in discussions relating to a Side Agreement to resolve those concerns. The Draft DCO [**AS-038**] proposes the Secretary of State is the appropriate discharging authority for the DCO Requirements. This is for the reasons set out in paragraph 6.3a-i on pages 67 & 68 of the Explanatory Memorandum to the DCO [**APP-057**]. However, as set out in the draft DCO [**AS-038**] the relevant highway authority will be	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		consulted as part of the process of discharging a number of the Requirements.	
	DCO drafting issues in the draft DCO, such as the failure to include a 'time limit' within which development must 'commence'. *As currently drafted, the DCO will allow unlimited time for the discharge of pre-commencement requirements*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.117 (DL 1).** **This is a Matter Under Discussion subject to further engagement on drafting of the draft DCO.** **The reason is summarised below:** Requirement 2 of Part 1 of Schedule 2 of the draft DCO [**Additional Submission AS-038**] requires the development to begin no later than five years after the date the DCO comes into force. Paragraph 6.10.2 of the Explanatory Memorandum [**Application Document APP-057**] explains the reason for the use of the term "begin" rather than "commence". Requirement 2 will be discharged by the carrying out of preliminary works, which are defined in Requirement 1 of Part 1 of Schedule 2 of the draft DCO [**Additional Submission AS-038**]. Preliminary works are defined in Schedule 2. The discharge of requirements is likely to be undertaken in parts across the Project as different elements of the Project are brought forward, therefore it is considered reasonable that there is no time limit on the discharge of pre-commencement requirements as the	Matter Under Discussion

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		construction programme is anticipated to be five years.	
Material Assets and Waste	*Paragraph 2.3.77 of Chapter 2 of the Environmental Statement (APP-140) introduces the "creation of Chalk Park following construction". National Highways is proposing the creation of Chalk Park as mitigation for the loss of open space as a result of the project (APP-126 item 2.1.33).* *It is not clear, however, whether Chalk Park is required to ensure the project is a sustainable pattern of development or if it is in fact required in order to effectively dispose or reuse of otherwise waste materials.* *It is not clear whether this is a disposal led activity at the bottom of the defined waste hierarchy, and as the least sustainable waste management outcome, this would not be in accordance with the Kent Minerals and Waste Local Plan 2013-30 (early Partial Review 2020).*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.118 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary the Applicant's position is as follows:** Chalk Park is an embedded design feature to mitigate the impact of the Project as well as integrate the portal and route alignment into the surrounding landscape. The feature is secured through clause S3.04 of Design Principles [**Application Document APP-516**]. The key drivers for the inclusion of Chalk Park within the Project proposals and its design rationale are set out in Project Design Report - Part D - General Design South of the River [**Application Document APP-509**]. This commitment is secured through its inclusion in the Register of Environmental Actions and Commitments in ES Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan [**Application Document APP-336**].	Matter Under Discussion
Nitrogen Deposition	*Woodlands are proposed to be created to mitigate the impacts of nitrogen deposition and there is a need to ensure they can be established, retained and managed in the long term.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.131 (DL 1).**	Matter Under Discussion

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	A number of the woodlands surveyed as part of this works were flagged up as not having any management and therefore as part of this process there is a need to question if further mitigation can be carried out through enabling management of some/all of those woodlands	**This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position and further engagement on the approach to detailed design and implementation through an oLEMP working group. In summary the Applicant's response is as follows:** The establishment, retention and long-term management of woodlands that are to be created to compensate for the potential impacts of nitrogen deposition is described in the outline Landscape and Ecology Management Plan (oLEMP) [**Application Document APP-490**]. The oLEMP sets out proposals for appropriate long-term adaptive management, which will be informed by long-term monitoring. Additionally, the Project Air Quality Action Plan (PAQAP) (Appendix 5.6 of the ES) **[Application Document APP-350]** includes the methodology for the approach to mitigation/compensation.	
Population and Human Health	*One clear plan indicating the PRoW network to be created; the legal status of the routes to be provided, and the context of the wider PRoW network.* *A General Arrangement Plan showing the WCH widths achievable to ensure these adhere to relevant standards*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.120 (DL 1).** **The Applicant considers that this is a Matter Agreed. The reason is summarised below:** Walking, cycling and horse-riding (WCH) routes within Kent are shown on the General Arrangement drawings found within the	Matter Agreed

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Heading	Matter	The Applicant's response	Status
		General Arrangement Plans (Volume B) (Sheets 1 to 20) [**Application Document APP-016**]. The proposed WCH routes are also shown within the Rights of Way and Access Plans (Volume B) (Sheets 1 to 20) [**Application Document APP-025**]. Details on all WCH routes can be found within the Project Design Report - Part E - Design for Walkers Cyclists and Horse riders [**Application Document APP-512**]. The design specifications (including widths) for these WCH routes will be dependent upon the environment within which they are located and their intended users and this will be confirmed at detailed design.	
	Provision of an adequate commuted sum or ongoing maintenance arrangements for the upkeep of the new routes	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.122 (DL 1).** **The Applicant considers that this is a Matter Not Agreed.** The Applicant's position is that the maintenance of both local highways, including PRoW, and the strategic road network (SRN) is funded by the Department for Transport (DfT). Given that this process already exists, it is not appropriate to require the Applicant to provide funding for the maintenance of parts of the local network out of the money given to it to maintain the SRN.	Matter Not Agreed

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		This arrangement is well precedented for local highway works carried out by the Applicant in connection with NSIP schemes. It strikes an appropriate balance between the Applicant's ability to carry out its works, and local highway authorities' duties to maintain public highways in their areas.	
	P*ermissive access, particularly for equestrian and cycle use, is not to be viewed as a suitable alternative / compensatory provision for Non-Motorised Users (NMUs).* PRoW routes need to have Highways status. Currently the provision south of the M2 corridor *through Jeskyns Community Woodland cannot be considered adequate.*	The matter **has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.123 (DL 1).** **The Applicant considers that this is a Matter Not Agreed.** The Applicant has prepared a Walking Cycling & Horse-riding (WCH) Strategy which includes new or improved pathways and bridges designed to encourage active travel and promote health and wellbeing across the region. These WCH routes will provide access between parks, woodlands, heritage sites and employment centres in Kent, Thurrock, Brentwood and Havering. Please refer to Project Design Report: Part E Walkers, Cyclists and Horse Riders [**Application Document APP-512**] and Chapter 5 of the Planning Statement [**Application Document APP-495**] which sets out this WCH strategy. The Applicant notes in response to Kent County Council's specific points: • It is not clear to what effect / receptor the Council's request for	Matter Not Agreed

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		alternative/compensatory provision relates - there is an existing horse riding trail through Jeskyns Wood, and the Applicant is not changing this, but is providing a permissive link from this existing route to Henhurst Road and the new bridleway to be created west of it by the Applicant – thereby increasing connectivity. • Both the existing and proposed routes are Permissive Paths. The Applicant is proposing a temporary alignment for cyclists on NCR177 while works to the road are ongoing. Once the permanent route is operational (with Highway status) this route will no longer be required as an alternative to the existing route, but could be retained by the landowner. Until the permanent route is open the Applicant will ensure that the temporary route through Jeskyns Wood is available using temporary acquisition powers. Provision of a bridleway south of the A2 was initially proposed but this was changed following feedback from Forestry England and the Woodland Trust. The Project has no powers to dedicate a PRoW over Crown land.	
	Installation of active travel counters 12 months before the construction phase starts; with the counters to be maintained for a period of three years post completion	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.125 (DL 1).** **This is a Matter Under Discussion subject to further discussions on the purpose of the proposed counters, their location and**	Matter Under Discussion

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		management, installation and data sharing arrangements.	
	KCC is particularly concerned about the specification of the widths and finished surfaces for proposed NMU routes, which will differ dependent on their proposed use and overall context	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.121 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary the Applicant's response is as follows:** The Applicant has provided details on all WCH routes within the Project Design Report - Part E - Design for Walkers Cyclists and Horse Riders [**Application Document APP-512**]. The specifications for these WCH routes will be dependent upon the environment within which they are located and their intended users. Defining the types of surfaces and widths will be undertaken at the detailed design stage. Specific WCH design principles can be found within Table 4.1 Project-wide design principles: Connecting people, within the Design Principles [**Application Document APP-516**].	Matter Under Discussion
	Negative health impacts have been found well below current EU & UK limits of which LTC references as the standard by which the significance of air quality has on human health. It should therefore be recognised that any improvement or deterioration in air quality will have an impact on human health both positive and negative.	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.140 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:**	Matter Under Discussion

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		The air quality assessment presented in ES Chapter 5: Air Quality [**Application Document APP-143**] has been carried out in accordance with DMRB LA 105 (Highways England, 2019). The predicted pollutant concentrations at receptors are compared to the appropriate legal thresholds including Limit Values and Air Quality Strategy Objectives. This is to ensure compliance with the National Policy Statement for National Networks (NPSNN), particularly when determining whether the Project has a significant impact on air quality. The change in pollutant concentration, both positive and negative, is described in the assessment in Chapter 5: Air Quality [**Application Document APP-143**] between paragraphs 5.6.30 and 5.6.112. Section 7.8 of the Health and Equalities Impact Assessment [**Application Document APP-539**] relates to air quality. The assessment draws from the findings of the air quality assessment presented in ES Chapter 5: Air Quality [**Application Document APP-143**] The assessment of health outcomes relating to changes in air quality during the operational phase is set out in Table 7.28.	
	It is also not clear why the impact on air quality of the LTC (APP-143) has been concluded as neutral when other health determinants have been more nuanced and explicit when there have been both positive and negative benefits.	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.141 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the**	Matter Under Discussion

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		Applicant's position. In summary, the Applicant's response is as follows: ES Chapter 5: Air Quality [**Application Document APP-143**] concluded that the Project is not expected to lead to a significant air quality effect on human health. The air quality assessment has been undertaken in line with DMRB LA 105 (Highways England, 2019). The health assessment in relation to air quality is presented within Section 7.8 of the Health and Equalities Impact Assessment [**Application Document APP-539**]. This describes the positive and negative impacts reported in ES Chapter 5: Air Quality [**Application Document APP-143**] and concludes a neutral health outcome in relation to construction and operation phases. A neutral assessment has been recorded for air quality on the basis that no significant impacts are reported in ES Chapter 5: Air Quality [**Application Document APP-143**] and that both positive and negative changes in air quality are reported along the route.	
	Within the HEqIA (APP-539) it is noted that the consultation highlighted concerns about the absence of a hard shoulder along the proposed road links within the Project with reference to potential safety. Kent has above average levels of killed and seriously injured casualties on the roads, and the absence of a hard shoulder has not been addressed with any evidence to justify the decision.	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.142 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:**	Matter Under Discussion

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		Safety is a key priority for the Applicant. The Project Design Report Part C: Design Rationale [**Application Document APP-508**] describes how the Project responds to the ten principles of good design. Paragraph 4.1.2 states that '*safety is fundamental to the design of the Project route and the road alignment, signage, barriers, structures and other highways elements have been designed to ensure the safety of users. The issue of safety becomes the overriding concern with design issues*'. The Project Design Report Part G: Design Evolution [**Application Document APP-514**] outlines key design changes as a result of consultation feedback and/or National Highways Design Review Panel (NHDRP) over the course of Project development. This is elaborated in the Project Design Report Part D: General Design South of the River [**Application Document APP-509**], and ES Chapter 2: Project Description [**Application Document APP-140**].	
Road Drainage and the Water Environment	*Whilst consultation has been undertaken on water matters with the Environment Agency with respect to groundwater modelling and Essex County Council with respect to design principles for attenuation and infiltration basins in 2019 and 2020, KCC expects the same level of consideration for water management within Kent's local area and it is disappointing that this still does not appear to be the case (the only direct consultation undertaken with KCC as Lead Local*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.143 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows:** The Applicant's drainage team provided a general update on the Project's drainage	Matter Agreed

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	Flood Authority took place in July and September 2017).	design to the south of the River Thames to a representative of Kent County Council Lead Local Flood Authority (LLFA) and the Medway Internal Drainage Board (IDB) in July 2020. Drainage pollution risk assessments were shared in August 2020, and the full FRA and Hydrogeological Risk Assessment were shared in October 2020. The Applicant met again with Kent County Council's technical drainage / water environment team on 9 May 2023 and it was considered that all technical issues were resolved through that engagement (subject to the following line in this table referring to sharing of information on drainage models).	
	It has not been possible to review the results of hydraulic modelling in order to demonstrate the operational capabilities of the drainage network proposed given the calculated infiltration rate. *Without being able to review this information KCC cannot be certain that the surface water drainage network operates within the required operational parameters.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.144 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows:** Micro Drainage model outputs have been shared with Kent County Council as PDF reports that provide details of the design criteria applied to each drainage network. The Applicant shared these with Kent County Council following a meeting on 9 May 2023.	Matter Agreed
	A plan should be provided which overlays the testing locations relative to the individual soakaway feature plans presented in the Flood Risk Assessment (APP-460 to APP477)	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.145 (DL 1).**	Matter Agreed

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		The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows: An assessment of infiltration rates applicable to the proposed soakaway features in Kent is provided in ES Appendix 14.5 Annex M [**Application Document APP-459**].	
	Whilst the majority of watercourses affected by the proposals are under the remit of the Environment Agency or Lower Medway Internal Drainage Board, there are some within the vicinity of Shorne and any works to these which could affect the watercourse or ditch's ability to convey water will require KCC's formal flood defence consent (including culvert removal, access culverts and outfall structures).	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.146 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows:** The requirement to secure ordinary watercourse consent for works to qualifying watercourses, is noted. As detailed in the Project's Consents and Agreements Position Statement, [**Application Document APP-058**], all of the powers required to undertake such works have been included, or addressed, within the DCO, as permitted by various provisions of the Planning Act 2008.	Matter Agreed
	KCC requests that a plan be provided which clearly shows the soakaway features proposed and which of these are within land currently under the ownership of National Highways	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.147 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows:**	Matter Agreed

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		Soakaway features, including proposed infiltration basins and swales are illustrated, together with the Order Limits, on the Drainage Plans (Volume B) (Sheets 1 to 20) [**Application Document APP-048**]. The Crown Land Plans [**Application Documents APP-009 to APP-011**] show ownership of land, including Crown Interest land of which the owner is the Secretary of State for Transport, and further details are presented in the Book of Reference [**Application Document APP-062**].	
	It is noted that Chapter 2 of the Environmental Statement (APP-140) states "Highway runoff would be collected by means of one of the edge of pavement details specified in the DMRB CD 524 (Highways England, 2021)." *Clause LSP.28 of the document 7.5 Design Principles (APP-516) states that "the use of gully pots shall be avoided where a viable alternative is available" as such KCC asks for clarification as to where and what edge of pavement detail will be used throughout catchment (EFR-1) to capture surface water flows*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.148 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows:** The use of gully pots is sought to be avoided where possible to reduce risks of amphibians and small mammals becoming trapped. Within catchment EFR-1, based on the preliminary drainage design, proposed edge-of-pavement detail includes a mixture of surface water channels and kerb and gully systems. This is set out in Table 2.1 6.3 Environmental Statement - Appendix 14.6 - Flood Risk Assessment - Part 1 **[Application Document APP-460]**	Matter Agreed

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		These details would be confirmed during detailed design.	
	Chapter 2 of the Environmental Statement (APP-140) paragraph 2.4.53 states "Where sediment forebays cannot be accommodated, a vortex grit separator shall be installed upstream of the basin inlet for pollution". *In order to confirm the appropriateness of such a device KCC asks that pollution mitigation indices be provided for these products in line with British Water's applying the Ciria SuDS Manual Simple Index Approach to proprietary/manufactured stormwater treatment devices document.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.149 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows:** There is one location in Kent where space constraints preclude a sediment forebay. This is at an existing basin located to the south of the M2/A2/A122 Lower Thames Crossing junction directly east of Cobham service and petrol filling station, that would be reconfigured as a vegetated drainage system. At this location a pollution control alternative would be provided in accordance with DMRB standards, with the final solution selected during the detailed design stage. The Hydrogeological Risk Assessment [**Application Documents APP-458** and **APP-459**] (ES Appendix 14.6 Annexes O and M) concludes that, on the basis of a conservative modelling assessment, there would be no exceedances of environmental quality or drinking water standards due to discharge and infiltration of operational drainage over the lifetime of the proposed Project.	Matter Agreed
	Chapter 2 of the Environmental Statement (APP-140) paragraph 2.7.75 states that an external waterproof membrane will be applied to precast	**The matter has been included in the Statement of Common Ground between**	Matter Under Discussion

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	box culverts and that this would typically be a bitumen coating KCC asks for confirmation to be provided from the relevant stakeholder(s) as to their acceptance of the use of bitumen.	**Kent County Council and the Applicant as Matter 2.1.150 (DL 1).** **This is a Matter Under Discussion -** the Applicant is seeking the views of the Environment Agency as to its acceptance of this aspect.	
	Paragraph 2.7.77 of Chapter 2 of the Environmental Statement (APP-140) describes the general makeup of headwalls in association with culverts. *Whilst not discussed, the County Council advises that the use of concrete bag headwalls is not permitted in KCC managed watercourses.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.151 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary the Applicant's response is as follows:** Noted. This requirement will be shared by the team progressing the detailed design and use of concrete bag headwalls will be avoided on Kent County Council managed watercourses.	Matter Agreed
	Paragraph 14.4.69 of chapter of 14 of the Environmental Statement (APP-152) mentions the requirement for nitrogen deposition compensation site KCC advises that should it be proposed for any water to be discharged other than via infiltration will need to be considered within and demonstrated as complaint with the Greenfield Run Off Rate	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.152 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary the Applicant's response is as follows:** No formal drainage is proposed for the nitrogen compensation areas. The rainfall infiltration and runoff regime will remain as existing (albeit with additional tree cover encouraging losses via evapotranspiration and providing attenuation of runoff).	Matter Agreed

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	Paragraph 14.5.10 of chapter 14 of the Environmental Statement (APP-152) discusses good practice with regards to the construction phase and that the contractor will be responsible for providing a Flood Risk Assessment and drainage plan. *KCC expects for the 1% AEP event to be considered as part of this.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.153 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows:** The construction phase FRA and drainage plan shall include consideration of 1% Annual Exceedance Probability (AEP) design storm events, inclusive of climate change allowances up to 2030.	Matter Agreed
	Within paragraph 4.7.2 of document 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 6 (APP-465) it is stated that "the Environment Agency verbally agreed at meeting held on 4th May 2022 that a 5% departure on peak rainfall intensities was acceptable. With this departure taken into account, the 20% and 40% uplift on peak rainfall intensity are deemed to be accepted for drainage design." Whilst accepting of this principle, KCC asks for clarification as to whether a similar departure has been permitted for 3.3% AEP rainfall event.	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.154 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows:** Given the DMRB requirement to ensure no overtopping of attenuation features during all events up to and including the 1% AEP (inclusive of climate change allowance), a departure specific to the 3.3% AEP event was not discussed with the EA. Sensitivity testing has been undertaken to demonstrate that the attenuation features are effective in response to consecutive 3.3% and 10% AEP storms.	Matter Agreed
	Whilst it is appreciated that further information has been provided within the FRA (APP466) with regards to the cascading pond network serving the	**The matter has been included in the Statement of Common Ground between**	Matter Agreed

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	southern portal, it is not clear as to what the staggered infiltration rates used for the design are to be. *As per the concerns above regarding hydraulic analysis, KCC cannot be certain as to its operational effectiveness without these rates and the hydraulic modelling thereof.*	**Kent County Council and the Applicant as Matter 2.1.155 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary, the Applicant's response is as follows:** ES Appendix 14.5 (Hydrogeological Risk Assessment) Annex M Table 5.1 [**Application Document APP-459**] shows the infiltration rates used in the groundwater modelling assessments of the cascading basins. The Applicant has now shared the hydraulic modelling outputs with Kent County Council.	
	The Thames Estuary Marshes next to/under the road receives its water via surface water/drains rather than ground water. *There is a need to ensure that KCC are satisfied that tunnel and road construction do not impact the functionality of the marshes and ensure that they will continue to receive and retain water.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.156 (DL 1).** **The Applicant considers that this is a Matter Agreed. In summary the Applicant's response is as follows:** Effects on the water balance of the Thames Estuary Marshes have been subject to detailed assessment, as reported in ES Chapter 14: Road Drainage and the Water Environment [**Application Document APP-152**]. Measures to ensure no detriment to the quality or quantity of water supporting the Marshes are secured via a suite of commitments within the REAC [**Application Document APP-336**].	Matter Agreed
Terrestrial Biodiversity	*The conclusions of 'no adverse impact' are based on the implementation of best practice guidelines for avoiding impacts from surface water, dust,*	**The matter has been included in the Statement of Common Ground between**	Matter Under Discussion

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	noise, air quality, vibration and lighting during construction and operational phase. *However, the Examining Authority must be satisfied that the proposed approaches are appropriate.*	**Kent County Council and the Applicant as Matter 2.1.135 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** The Habitats Regulations Assessment - Screening Report and Statement to Inform an Appropriate Assessment [**Application Document APP-487**] sets out the Project design and environmental measures in Section 3.3 and mitigation measures in Section 7.1. The measures that are established good practice methods are highlighted and their effectiveness at avoiding or reducing impacts has been reported within the assessment of likely significant effects Section 6.2 under the heading "Efficacy of committed measures" and within Section 7.1 under the heading "Confidence of success". The Applicant considers this an appropriate approach to setting out the effectiveness of mitigation measures.	
	The species surveys have not covered all habitats or species to fully assess the impact of the proposed development (for example moth surveys have not been conducted, all required bat emergence surveys not completed, bat activity surveys did not follow best practice guidelines and reptile surveys do not appear to have been carried in all suitable habitat).	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.132 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:**	Matter Under Discussion

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		All the required surveys have been undertaken to develop an ecological baseline against which the assessment of likely significant effects has been completed. Any limitations around extent of surveys and divergence from best practice have been detailed within the relevant technical appendices supporting the application. With respect to terrestrial invertebrates, notably moths, baseline survey data is reported in ES Appendix 8.3 Terrestrial Invertebrates [**Application Document APP-392**]. With respect to bats, baseline survey data is reported in ES Appendix 8.8 – Bats [**Application Document APP-397**]. In Appendix 8.6 – Reptiles [**Application Document APP-395**], Section 6 Limitations and assumptions, is the relevant section. Regarding the overall assessment of likely significant effects, these are reported in ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**].	
	Only one receptor site has been clearly mentioned in the Outline Landscape and Ecology Management Plan (oLEMP) (APP-490) for reptiles. *It is noted that this site will require habitat manipulation and then habitat creation to make it suitable, taking an estimated 10 years before the habitat is of the required condition.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.133 (DL 1)** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	Mitigation areas need to be in a condition to support the species when required during the construction timetable	The length of time required for a habitat to reach a target condition which aligns with Natural England's biodiversity metric calculator is distinct from the period within which the habitat will support a range of faunal species. Thong Open Mosaic Habitat has been identified as a receptor site for reptiles in the outline Landscape and Ecology Management Plan [**Application Document APP-490**]. The Thong Open Mosaic Habitat management area is considered an appropriate site for reptile translocation within 12-18 months of habitat creation, but to align with the biodiversity metric criteria for Open Mosaic Habitat, the metric calculator presents a 10-year establishment period.	
	In regards to mitigation for the loss of veteran trees, the proposals state that "a minimum of 30 individual specimen trees would be planted as replacement for lost veteran trees". *The County Council also has concerns that 30 trees is not sufficient for the loss of veteran trees and there must be a responsibility to retain standing deadwood.* *For example, all dead wood must not be left in log piles and should instead be strapped to felled mature trees to support invertebrate diversity*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.134 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** The removal of trees to facilitate construction of the Project is discussed in ES Appendix 7.12: Arboricultural Impact Assessment [**Application Document APP-387**]. The worst-case assumption on the likely loss of trees in paragraph 5.2.11 of the Arboricultural Impact Assessment is that six potential veteran trees (trees identified during	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		Project surveys as displaying the features of a veteran tree but not recorded on the Ancient Tree Inventory) would be removed to facilitate the Project. Three of these six potential veteran trees would be lost south of the River Thames. However, commitment LV001 of the REAC [**Application Document APP-336**] mandates an aim for the detailed design for the Project, including diverted utilities, to reduce the removal of trees and vegetation as far as reasonably practicable. This includes potential veteran trees. In accordance with commitment LV032 set out in the REAC, a minimum of 30 specimen trees would be replanted as replacement for lost veteran trees, 15 of which would be replanted to the south of the River Thames in Kent. This specimen tree planting would be in addition to the extensive native woodland planting also proposed south of the River Thames, as shown on the Environmental Masterplan Sections 1 & 1A, 2, 3 4 [**Application Documents APP-159, APP-160, APP-161, APP-162**]. Where felling of veteran trees cannot be avoided, the intact hulk would be retained and relocated in close proximity to a nearby veteran tree or within a parkland to allow fungi and invertebrates to relocate and promote habitat creation (in the form of standing dead wood). This measure is secured via the REAC commitment LV031.	

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Heading	Matter	The Applicant's response	Status
	The County Council is concerned that the BNG calculations for the Project is anticipated to be lower than 3% for Kent. *Trading rules have not been satisfied and thus the positive net gain scores south of the Thames will be invalid.* *There are concerns that condition assessment information may be inaccurate – a limitation the ecologists acknowledge.* *BNG has been discussed since the original DCO submission in 2020 so the applicant has had sufficient time to collect this information to support the BNG assessment.* *There is also no mention in document 6.3 appendix 8.21 – Biodiversity Metric Calculations (APP-417) about how additionality has been dealt with, with regards to protected species.* *For example, receptor sites for Great Crested Newts/reptiles should only be allowed within the calculations up to no net loss and it is not clear within the submission if this point has been addressed.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as part of Matter 2.1.127 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** Paragraph 5.3.22 of ES Appendix 8.21 Biodiversity Metric Calculations [**Application Document APP-417**], states that the assessment of the Project does include biodiversity units generated by essential ecological mitigation areas included within the Order Limits to mitigate and compensate for effects on protected species. As only 5% of all the post-intervention units in Kent are generated through these essential mitigation areas, it is considered that the Project aligns with the current approach for protected species mitigation/compensation additionality. Field survey (undertaken between 2017-2020) for the Project started before the first Biodiversity Metric Condition Assessment criteria were released in July 2019. There were two further updates to the Metric and associated condition criteria, prior to DCO submission, Metric 3.0 (July 2021) and Metric 3.1 (April, 2022). Given the scale of the Project (the area representing the Project's baseline is greater than 2,000ha) and the number of different landowners involved, it has not been	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		possible, or considered proportionate, to re-survey the entire site to meet the changing Metric condition criteria requirements. This limitation has been acknowledged in 6.3 Environmental Statement Appendices - Appendix 8.21 - Biodiversity Metric Calculations **[Application Document APP-417].** However, as stated in the assessment, a detailed exercise has been undertaken to review the desk and field survey data available, including consideration of Priority Habitat information, to assign appropriate condition using the Metric 3.1 condition criteria. Where assumptions have been made, these have been based on the information available and have been precautionary to avoid potentially under-valuing the baseline. Likewise other elements of the assessment have been precautionary so that it is considered a realistic worst-case scenario at the preliminary design stage. It is expected that the forecast Metric performance will improve during detailed design as design refinements would seek to: further reduce habitat loss during construction, to minimise lags between habitat loss and creation and to maximise the condition and distinctiveness of habitats created. It should be noted that the Project is applying the Natural England Biodiversity Metric several years ahead of this being a mandatory requirement. For Nationally Significant	

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Heading	Matter	The Applicant's response	Status
		Infrastructure Projects, mandatory BNG is likely to commence in November 2025.	
	The Project includes proposals for three green bridges, however currently these offer poor connectivity to other suitable habitats and the inclusion of roads on the structures provides additional hazards to animals trying to use the bridges to access other areas of suitable habitat.	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.128 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** The design of all green bridges proposed as part of the Project is reported in Project Design Report – Part D – General Design South of the River [**Application Document APP-509**]. All three green bridges within Kent are maintaining road connections that already exist in those locations to avoid severance impacts as a result of the Project. In respect of the green bridges at Brewers Road and Thong Lane South, these are providing new habitat connections where they are currently absent due to the existing transport corridors of the A2 and HS1. The provision of green bridges is a benefit as a result of the Project, and is reported in ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] at paragraph 8.5.8, and in the outline Landscape and Ecology Management Plan [**Application Document APP-490**] at paragraph 5.6.6.	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		The specific design principles for green bridges are reported in Design Principles [**Application Document APP-516**]. Clause STR.08 states that planting would tie in with the broader landscape to ensure connectivity. Clause S1.04 states that detailed design would provide connectivity of habitats for a range of protected species between Shorne Woods and Ashenbank Woods, Jeskyns and Cobham Park. This connectivity is currently absent given the habitat severance caused by the existing A2 and the HS1 railway line, so the provision of new green bridges at Thong Lane South and Brewers Road would help address this existing impact. Clause S2.04 states that Thong Lane North green bridge would be designed to extend the character of the well-vegetated Thong Lane and to connect woodland to the east and west to provide a habitat corridor for mammals. This connectivity between habitats adjacent to and within the green bridges would facilitate movement of a range of species across them.	
	Very minimal information has been provided for the anticipated light spill (APP-199) from the operational phase of the Project, with only a small section highlighting the expected light spill upon key receptors. *Without this information the County Council is unable to determine the full extent of the impacts.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant as Matter 2.1.129 (DL 1).** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:**	Matter Under Discussion

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		The location of operational lighting is shown on the General Arrangement Plans (Volume B) [**Application Document APP-016**] and (Volume C) [**Application Document APP-017**]. As described in ES Chapter 2: Project Description [**Application Document APP-140**], proposed lighting has been designed with consideration of associated environmental impacts. These measures are reinforced in principle LST.02 and principle LST.03 of the Design Principles [**Application Document APP-516**] to preserve the nocturnal character of the landscape. The effect of light spill on European sites is assessed in paragraphs 6.2.107 to 6.2.115 in the Habitats Regulations Assessment - Screening Report and Statement to Inform an Appropriate Assessment [**Application Document APP-487**]. The calculations that support the assessment of the effects of light spill on ecological receptors are reported in ES Appendix 8.15 - Construction and Operational Light Spill Calculations [**Application Document APP-407**].	
Wider Network Impacts	*All 11 SRN junctions have been included in the Wider Network Impacts Management and Monitoring Plan (WNIMMP) (APP-545) for the project, except for M25 Junction 2 (M25 / A2 / A282), which we request to be added.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant within Matters 2.1.136 (DL 1) and 2.1.138 (DL 1).**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	We also request that M25 Junction 1b (M25 / A225 / A296) is added and the A2 Pepper Hill junction including Hall Road/Station Road/New Barn Road south of the A2 (to be included alongside the Hall Road/Springhead Road junction already included) because these have been shown to be pushed over capacity in the Do Something scenario *KCC requests that the scope of the WNIMMP (APP-545) is further expanded to include the locations identified in the WNI study, to cover baseline surveys before construction starts.* *Additionally, the A206 Thames Way between Crayford Way and Burnham Road should be added to the WNIMMP (APP-545) monitoring schedule because the information in the Transport Assessment (APP-529) demonstrates a significant increase in traffic flow at this location*	**This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** The monitoring locations are set out in the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**]. The monitoring locations set out in 7.12 Wider Network Impacts Management and Monitoring Plan **[Application Document APP-545]** were selected based on several criteria and using feedback from engagement. Locations were selected if situated on the SRN that are geographically close to the A122 junctions as informed by the 'scale of impacts' analysis in the Transport Assessment (the nearest and second nearest junctions on the SRN and MRN located adjacent to the junctions with the A122, the A2, the A13 and the M25) Locations were selected if requested for monitoring from local highway authorities following a review of the consultation feedback. A mechanism allowing for review of the proposed monitoring locations is provided through Requirement 14 in Schedule 2 of 3.1 draft Development Consent Order **[Application Document AS-038]**, which requires the preparation of an operational traffic monitoring plan, which must be approved by the Secretary of State following	

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Heading	Matter	The Applicant's response	Status
		consultation with the relevant highways authorities. The Applicant does not consider it necessary to include additional locations at this time, as the mechanism set out above will allow for the introduction of new locations at a future date, following a consultation with relevant authorities on actual traffic flows closer to the opening year.	
	APP-529 - Document 7.9 - Transport Assessment (TA) indicates from the LTAM model that the new junction of the LTC with the A2 is forecast to operate at up to 76% capacity in the Design Year 2045 AM peak; although a number of highway links exceed 85% in the PM peak. *The WNI study found similar results for highway links using the KTM model, but the KTM is also able to assess highway "nodes" within the junction, such as merges, diverges and roundabouts.* *The KTM shows that some nodes on this junction are operating at over 100% capacity in both AM and PM peaks in both Opening Year 2030 and Design Year 2045.* *The A2/LTC junction is included in the WNIMMP (APP-545) and KCC requests that the monitoring programme include an assessment of increased use of unsuitable rural routes as bypasses to avoid the SRN due to congestion in the vicinity of the A2/LTC junction.* *The WNI study has demonstrated that such "rat running" is forecast to occur, and it is also a key concern of local stakeholders.*	**The matter has been included in the Statement of Common Ground between Kent County Council and the Applicant within Matters 2.1.157 (DL 1)** **This is a Matter Under Discussion subject to Kent County Council's review of the Applicant's position. In summary, the Applicant's response is as follows:** As part of the development of the design of the Project, the flow and capacity of individual merges and diverges on the new road and on connections between the existing road network and the new road have been assessed and are within the appropriate standards. The Applicant is working with Kent County Council to understand the analysis referenced by the council, that the council considers shows capacity being reached in the Opening Year. The monitoring locations set out in the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**] were selected on the following basis:	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		• Locations situated on the SRN that are geographically close to the A122 junctions as informed by the 'scale of impacts' analysis in the Transport Assessment (the nearest and second nearest junctions on the SRN and major road network located adjacent to the junctions with the A122, the A2, the A13 and the M25) • Locations requested for monitoring from local highway authorities following a review of the consultation feedback A mechanism allowing for review of the proposed monitoring locations is provided through Requirement 14 in Schedule 2 of the draft Development Consent Order [**Additional Submission AS-038**]. This requires the preparation of an operational traffic monitoring plan, which must be approved by the Secretary of State following consultation with the relevant highways authorities. The Applicant does not consider it necessary to include additional locations at this time, as the mechanism set out above will allow for the introduction of new locations at a future date, following a consultation with relevant authorities on actual traffic flows closer to the opening year.	

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2.21 Kent Downs Area of Outstanding Natural Beauty Unit

Introduction

2.21.1 Areas of Outstanding Natural Beauty (AONBs) are nationally important and protected landscapes that have the same status in planning terms as National Parks and represent 18% of the land area of England and Wales. The Kent Downs AONB Unit acts in an advisory role on applications which would have a significant effect on the Kent Downs AONB, including direct and indirect impacts to the Kent Downs AONB and its setting. As a prescribed consultee under section 42(1)(a) of the Planning Act 2008 and schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, Kent Downs AONB Unit was notified of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.21.2 The Applicant and Kent Downs AONB Unit prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-097**].

2.21.3 This SoCG was signed by both parties to confirm that this SoCG was an accurate description of the matters raised by the Kent Downs AONB Unit, and the current status of each matter.

2.21.4 Since DCO Application the parties have worked collaboratively to update the SoCG, which has been submitted at DL 1

2.21.5 The matters included in the Kent Downs AONB Unit RR were the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. Table 2.31 sets out those issues and provides references within that SoCG. However, there are some new matters raised in the RR that were not included in the submission version of the SoCG and these are presented in Table 2.32.

Overview of matters raised in the Kent Downs AONB Unit's RR

Table 2.31 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Route selection, model alternatives & assessment of reasonable alternatives	Route Location	2.1.3	**Application Document APP-097**
Landscape and Visual	Impacts	2.1.7, 2.1.8, 2.1.9 2.1.11. 2.1.12, 2.1.14, 2.1.15	
	Mitigation	2.1.16, 2.1.17, 2.1.22	
Nitrogen Deposition	Compensation	2.1.31, 2.1.32	

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Table 2.32 New Matters raised in RR, which are addressed in the SoCGs submitted at DL 1

Heading	Matter	The Applicant's response	Status
Landscape and visual	*Where mitigation planting is proposed within the AONB, it does not always reflect landscape character, such as on former parkland north of Park Pale*.	**The matter has been included in the Statement of Common Ground between the Kent Downs AONB Unit and the Applicant as 2.1.36 (DL 1) under the headings 'landscape and visual', 'mitigation'.** **This is a Matter Under Discussion subject to the AONB Unit's review of the Applicant's position. In summary, the Applicant's response is as follows:** Project Design Report, Part D: General Design South of the River [**Application Document APP-509**] discusses the approach to the Project design, including where the design has considered the Kent Downs AONB. The requirement for the design to be in accordance with the Design Principles [**Application Document APP-516**] would ensure that planting within the AONB will be reflective of the landscape character of the Kent Downs AONB.	Matter Under Discussion
	The Kent Downs AONB Unit expressed its support of measures incorporated into the outline Landscape and Ecology Management Plan (oLEMP) (Application Document 6.7), which has been developed with input from the AONB Unit. However, the AONB Unit is concerned not to be identified as a relevant Stakeholder with whom the LEMP is to be developed further, as set out at paragraph 2.16 and Table 2.1 of the oLEMP (Application Document 6.7).	**This will be added as a new matter in the SoCG between the Kent Downs AONB Unit and the Applicant as 2.1.39 (DL 1) under the headings 'landscape and visual', 'mitigation'.** The stakeholders identified for consultation during the further development of the LEMP mirrored those identified for consultation on the subsequent iterations of the Code of Construction Practice, where Natural England provides statutory advice in relation to development proposals that affect the Kent Downs AONB as well as other designated sites, habitats and protected species. However, the Applicant would welcome the inclusion of the Kent Downs AONB Unit in the further development of the LEMP, either directly as a named consultee or through	Matter Agreed

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Heading	Matter	The Applicant's response	Status
		advice provided by Natural England. The Applicant therefore proposes to update the outline Landscape and Ecology Management Plan [**Application Document APP-490**] by DL 1 to include the AONB Unit as a named consultee in Table 2.1.	
	The Kent Downs AONB Unit expressed concern that the level of harm to the AONB is under-assessed in some cases in the landscape and visual impact assessment, in particular in respect of the reported effects at design year, but also in respect of some of the opening year effects, mainly as a result of what the AONB Unit considers to be under-assessment of magnitude of change. The AONB Unit states this consequently leads to under-estimated residual significance of effects for the receptors. The AONB Unit also considers that the impacts reported in ES Appendix 7.13: Views from the Road Assessment are under assessed in respect of views from within the AONB, both in respect of the sensitivity of the receptor and the predicted magnitude of change at construction, Year 1 and the design year.	**This will be added as a new matter in the SoCG between the Kent Downs AONB Unit and the Applicant as 2.1.40 (DL 1) under the headings 'landscape and visual', 'impacts.** **This is a Matter Not Agreed.** The methodology for the landscape and visual impact assessment is set out in Section 7.3 of ES Chapter 7: Landscape and Visual [**Application Document APP-145**] and ES Appendix 7.2: Landscape and Visual Assessment [**Application Document APP-377**] and has been appropriately applied to assess the realistic worst-case effects likely to arise from the Project on the landscape character and visual amenity of the Kent Downs AONB. These realistic worst-case effects are set out in ES Appendix 7.9 Schedule of Landscape Effects [**Application Document APP-384**] and ES Appendix 7.10 Schedule of Visual Effects [**Application Document APP-385**]. The landscape character and views from the Kent Downs AONB are already impacted by the existing M2/A2 corridor and this has been taken into consideration in the landscape and visual impact assessment. Landscape and visual effects at design year have been assessed with regard to the mitigation that would be provided by the proposed planting shown on ES Figure 2.4: Environmental Masterplan [**Application Documents APP-159**, **APP-160** and **APP-161**] Sections 1 & 1A (1 of 10), Section 2 (2 of 10) and Section 3 (3 of 10), allowing for the effect of 15 years of growth.	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
		The sensitivity of visual receptors within ES Appendix 7.13: Views from the Road Assessment [**Application Document APP-388**] has been based on Design Manual for Roads and Bridges LA 107 Landscape and visual effects[1], where users of main roads are identified as being of low sensitivity. The assessment of the magnitude of change in views reported takes into consideration the effect of existing highway infrastructure on the views of road users traveling along the M2/A2 corridor within the Kent Downs AONB.	
Planning statement/ policy	*At F.3.5 of the Planning Statement Appendix F Kent Downs AONB, it is advised that environmental compensation and mitigation in the Kent Downs AONB includes earthwork features such as false cuttings, walking, cycling and horse-riding route realignments, improved connections over the A2/M2 and with local roads, ancient woodland compensation planting and extensive woodland planting around the A122/A2/M2 junction. This is not considered by the AONB Unit to represent compensation for the harm arising to the landscape and scenic beauty of the Kent Downs AONB.*	**This will be added as a new matter in the SoCG between the Kent Downs AONB Unit and the Applicant as 2.1.37 (DL 1) under the headings 'planning statement/policy', 'landscape compensation'.** **This is a Matter Under Discussion subject to the AONB Unit's review of the Applicant's response.** As acknowledged in the Kent Downs AONB Unit's RR, the Applicant is engaged in constructive ongoing discussions with the AONB Unit regarding appropriate compensation for the harm to the Kent Downs AONB. For clarity, paragraph F.3.5 of the Planning Statement Appendix F: Kent Downs Area of Outstanding Natural Beauty [**Application Document APP-501**] simply identifies mitigation and compensation measures that are in the Kent Downs AONB; it does not state that the measures compensate for the harm to the AONB arising from the Project.	Matter Under Discussion
DCO and consents	The Kent Downs AONB Unit stated that the Design Principles document (Application Document 7.5) contains	**This will be added as a new matter in the SoCG between the Kent Downs AONB Unit and the Applicant**	Matter Not Agreed

[1] Highways England (2020). Design Manual for Roads and Bridges, LA 107 Landscape and visual effects. Revision 2. Accessed May 2023. https://www.standardsforhighways.co.uk/tses/attachments/bc8a371f-2443-4761-af5d-f37d632c5734?inline=true.

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Heading	Matter	The Applicant's response	Status
	many measures that are supported, as they incorporate requirements that are appropriate to the site's location within or affecting the Kent Downs AONB. However, the AONB Unit is concerned that many of the requirements are worded in such a way that they may not be complied with in reality. This includes many references to 'where practical', 'where reasonably practical' and 'unless otherwise agreed'.	**as 2.1.38 (DL 1) under the headings 'DCO and Consents', 'securing mechanisms'.** **This is a Matter Not Agreed.** The draft DCO [**Additional Submission AS-038**] states that the authorised development must be designed in detail and carried out in accordance with the Design Principles and the preliminary scheme design, unless otherwise agreed in writing. The wording maintains a degree of flexibility for the detailed design to respond to practical design considerations. However, the requirement for the design to be in accordance with the Design Principles would ensure that the underlying requirements of each principle are met, subject to any practical limitations that could not be reasonably overcome.	
Landscape and visual	The Kent Downs AONB Unit expressed disappointment that the Applicant is consulting on the removal of the Burham site, and the reduction in the size of the Blue Bell Hill site. If this change is agreed, the AONB Unit would not consider that the reduced Blue Bell Hill site is sufficiently large to provide compensatory enhancements for the Kent Downs AONB.	**This issue will be added to the existing SoCG matter 2.1.26 at DL 1, under the headings 'landscape and visual', 'compensation', which is a Matter Under Discussion.** The Applicant has included a 74ha nitrogen deposition compensation site at Blue Bell Hill and a 10ha nitrogen deposition compensation site at Burham, which would also provide compensatory enhancements for the AONB Unit. Following engagement with the landowner, the Applicant is consulting on the proposed removal of the Burham site and a 29ha reduction in the Blue Bell Hill site. The Applicant is continuing to work collaboratively with the AONB Unit to consider its suggestions for additional compensatory enhancement measures, which are subject to ongoing discussion.	Matter Under Discussion
Compensation	The Kent Downs AONB Unit expressed concern that, should the proposed changes to the Burham and	**This issue will be added to the existing SoCG matter 2.1.33 at DL 1, under the headings 'nitrogen**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	Bluebell Hill nitrogen deposition compensation sites be implemented, the scale of compensation sites in the AONB would be substantially reduced and would no longer represent a landscape scale enhancement for the AONB.	**deposition', 'compensation', which is a Matter Under Discussion.** Following engagement with the landowner, the Applicant is consulting on a proposed 29ha reduction in the Blue Bell Hill site. The retained 44ha at Blue Bell Hill would be the land which maximises the ecological connectivity, and therefore the Blue Bell Hill site would continue to provide a robust ecological connection to existing woodland and a landscape scale enhancement.	
	The Kent Downs AONB Unit expressed disappointment that, following the Local Refinement consultation, the site at Blue Bell Hill was reduced by 30ha. The AONB Unit also expressed disappointment that the Applicant is consulting on proposals to remove the Burham nitrogen deposition compensation site, and to further reduce the Blue Bell Hill site by 29ha and would not support these changes.	**This issue will be added to the existing SoCG matter 2.1.35 at DL 1, under the headings 'nitrogen deposition', 'compensation', which is a Matter Not Agreed.** The Applicant considered stakeholder and landowner feedback from the 2022 Local Refinement Consultation and took the decision to reduce the land-take in the Blue Bell Hill compensation field by 30ha, and to add a 10ha site at Burham. Ongoing engagement with the landowner of these sites has highlighted new information about the implications of the proposals on the farm business, and a newly agreed Countryside Stewardship Scheme. The Applicant has consulted on the proposed removal of the Burham site from the Order Limits, and a potential 29ha reduction in the Blue Bell Hill site. The retained 44ha would be the land which maximises the ecological connectivity, and therefore the Blue Bell Hill site would continue to provide a robust ecological connection to existing woodland and therefore its nitrogen deposition compensation function. The Applicant has also included additional landscape-focused oLEMP management requirements [**APP-490**]. The site therefore offers an enhancement for the AONB at a landscape scale.	Matter Not Agreed

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2.22 London Borough of Havering

Introduction

2.22.1 The London Borough of Havering (Havering) is a host authority in respect of the application and as such is a category 'B' local authority under section 43 of the Planning Act 2008. Under s42(1)(b) of the Planning Act, Havering was notified of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.22.2 The Applicant and Havering prepared an SoCG that was submitted as part of the DCO application [**Application Document APP-127**].

2.22.3 A revised draft SoCG was presented at DL 1 as the Applicant's understanding of the status of discussions with Havering.

2.22.4 Most of the issues raised in Havering's RR are represented within the SoCG, those Matters are presented in Table 2.33, along with the applicable item number. New Matters raised in Havering's RR, that were not included in the DCO Application SoCG are presented in Table 2.34. The RR also contained Matters which are being addressed outside of the SoCG, they can be found in Table 2.35.

Overview of matters raised in the London Borough of Havering's RR

Table 2.33 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
DCO and Consents	Consent Process Environment	2.1.2, 2.1.6	[**Application Document APP-127**]
Need for the Project	Need for the Project	2.1.9	
Planning statement/policy	Infrastructure strategy Waste management Open space Environment	2.1.10, 2.1.12-16	
Land and compulsory acquisition	Impacts	2.1.21	
Construction	Communication and community engagement Mitigation Closures and diversions Construction traffic impacts	2.1.23-27, 2.1.30	
Traffic and Economics	Modelling methodology Local plan growth	2.1.37-38	
Wider Network Impacts	WNI approach Local WNI concerns	2.1.39, 2.1.41	
Population and human health	WCH / Active Travel - Design	2.1.70	

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Table 2.34 New Matters raised in RR, which are addressed in the SoCG submitted at DL 1

Heading	Matter	The Applicant's response	Status
Protective Provisions	*LB Havering has a number of concerns regarding the current drafting of the draft Development Consent Order (dDCO). The document lacks any Protective Provisions for Havering in terms of maintenance of new structures (Part 3 Streets, Article 10 subsection 5)* […]. *Havering also would wish to see Protective Provisions drawn up for the protection of the Local Highway Authority regarding vehicular and non-vehicular highways. The current side agreement drafted by the applicant does not provide the surety that local highways will be protected. It is noted that the applicant does not wish to see this side agreement scrutinised by the ExA. The Council believes that this is an inappropriate approach.*	**This will be added as a new matter in the SoCG as 2.1.76 (DL 1) under 'Protective Provisions' which is a Matter Under Discussion** The proposed DCO already provides protection for local highway authorities (LHAs), including London Borough of Havering, by including approval powers and maintenance functions directly within the works powers – for example see Articles 9 and 10 of the dDCO [**Additional Submission AS-038**].	Matter Under Discussion
Construction	*There is a lack of surety in the Control Documents that the diversion routes proposed are appropriate for the type of vehicles that will be using them.*	**This will be added as a new matter in the SoCG as 2.1.77 (DL 1) under 'Construction'. In summary, the Applicant's response is as follows:** The Applicant understands this concern relates to the Ockendon Road closure. To address the concern regarding the Ockendon Road diversion, further engagement and discussions with the local highway authority would be carried out in determining suitable diversion routes, which would be set out in the Traffic Management Plan. Table 4.5 in the outline Traffic	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		Management Plan for Construction [**Application Document APP-547**] has set a proposed diversion route as a start point for further discussion via the Traffic Management Forum as stated in paragraph 4.7.3: '*The diversion route would be determined through discussions with the local highway authority closer to the time as other factors may need to be taken into account to make the decision (e.g., other works in the nearby area which may be external from the Project works).*'	
Socio-economics	*The Skills and Employment Strategy that is included in S106 is not supported by Havering as it fails to provide surety that a targeted proportion of the proposed 20,000 jobs created by the scheme will be secured for the Borough.*	**This will be added as a new matter in the SoCG as 2.1.79 (DL 1) under 'Socio-economics' which is a Matter Under Discussion.** The Project has committed to a target of 45% of its workforce based within 20 miles of the Project. This target has been central to the procurement process of the main works contracts. The Project's delivery partners will be required to engage with local job brokerage services and education providers to advertise jobs and share details of roles for publication through local communication channels. More information on this can be found in the Workers Accommodation Report [**Application Document APP-551**].	Matter Under Discussion
Population and Human Health	*The Council remains deeply concerned about the scheme's impacts, and continues to make the case for mitigation where the applicant has failed to provide sufficient surety to the authority that necessary mitigation will be provided.* […] *The Section 106 Heads of Terms*	**This will be added as a new matter in the SoCG as 2.1.80 (DL 1) under 'Population and Human Health' which is a Matter Under Discussion.** With regard to the council's comments that it remains concerned about the impacts of the Project, the need for mitigation and surety provided by the Section 106 Heads of Terms in this regard, it should be noted that the mitigation referred to in the ES is secured directly	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	document does not give the Council surety that the Applicant can satisfactorily manage the impacts of the scheme.	through the legally binding Requirements of the draft DCO [**Additional Submission AS-038**] rather than a Section 106 Agreement. The principal source of environmental mitigation is found in the Register of Environmental Actions and Commitments (REAC) presented within ES Appendix 2.2, Code of Construction Practice, First Iteration of Environmental Management Plan [**Application Document APP-336**].	
DCO and Consents	*The Council has concerns regarding the drafting of the current Articles and Requirements in the dDCO, namely* […] *the use of the phrases "reasonable endeavours" and "best endeavours" for the revisions of control documents. The Council would wish to see these revised in line with the approach taken on both matters in the consented DCO for M25 Junction 28 Improvement scheme.*	**This issue would be added as a point within the existing matter (2.1.6) in the SoCG under 'DCO and Consents' at DL 1 and is currently a Matter Under Discussion. In summary, the Applicant's response is as follows:** Further negotiations are ongoing between the Applicant and the London Borough of Havering to address this issue alongside the council's recommendation to change instances of 'substantially in accordance' to 'in accordance' within the draft DCO [**Additional Submission AS-038**] in light of this being incorporated into the recent M25 Junction 28 DCO.	Matter Under Discussion
Charging	*Havering notes that there are drafting inconsistencies between the Draft Development Consent Order (dDCO) and its supporting strategies, namely Road User Charging. Havering wishes for its residents to be eligible for a local residents discount and for the Road User Charging strategy to be in line with the contents of Schedule 12 Article 45 of the dDCO.*	**This issue would be added as a point within the existing matter (2.1.31) in the SoCG under 'Charging' at DL 1 and is currently a Matter not Agreed. In summary, the Applicant's response is as follows:** This matter is linked to the wider matter of resident and business discounts on the proposed Road User Charge for the Lower Thames Crossing for Havering (2.1.31 of the SoCG). Paragraph 5 of Schedule 12 of the dDCO [**Additional Submission AS-039**] provides for the Secretary of State to enter into a "local resident's agreement"	Matter not agreed

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Heading	Matter	The Applicant's response	Status
		regarding a reduced charge. However, "local resident" is defined in paragraph 1 (Interpretation) as "a person who permanently resides in the borough of Gravesham or Thurrock", therefore there is no conflict with the Local Residents Discount Scheme proposed in the Road User Charing Statement **[Application Document APP-517]**.	

Table 2.35 New and existing Matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Consultation and engagement	*The Applicant has stated that no application documents will be updated following further discussions with stakeholders during the pre-examination phase. This makes it extremely difficult for amendments to be agreed and recorded. The Council would welcome a change to this approach.*	It is not usual practice for new information to be submitted at the pre-examination stage unless specifically requested to do so by the Examining Authority as noted in section 5 of the Planning Inspectorate Procedural Decision letter (19 December 2022) [PD-005]. The Applicant is, however, committed to continual engagement with all stakeholders throughout the Examination process and this will include the consideration of updates and changes to DCO documents where necessary. The Applicant continues to engage in dialogue with the London Borough of Havering and is pursuing the update of the Statement of Common Ground [**Application Document APP-127**] which was not agreed / signed at the time of the submission of the DCO application in October 2022. Should it be necessary to submit updated documents through the Examination process, then an agreed (or not agreed) position on this can be captured in the updated SoCG at that time.	Closed

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2.23 Luddesdown Parish Council

Introduction

2.23.1 Luddesdown Parish Council provides a number of services for the village in conjunction with Gravesham Borough Council and Kent County Council. Luddesdown Parish Council is a prescribed consultee for the Project, under s42(1)(a) of the Planning Act 2008.

2.23.2 Following the Rule 6 and Rule 8 Letter, the Applicant has engaged with Luddesdown Parish Council and both Parties have begun to develop an SoCG. At DL 1, the SoCG remains under development and it is expected that an SoCG will be submitted at a later examination deadline.

2.23.3 All matters raised in the RR are set out in Table 2.36. Luddesdown Parish Council's RR also included several matters which have been addressed outside of the SoCG, those matters can be seen in Table 2.37.

Overview of matters raised in Luddesdown Parish Council's RR

Table 2.36 Matters raised in RR, to be included in the SoCG and submitted at a later deadline

Heading	Matter	The Applicant's response	Status
Traffic and Economics	Luddesdown Parish Council feel that there has been a lack of traffic modelling by National Highways on their roads. The centre of the village of Luddesdown is approximately 1.7miles from the roundabout joining the A2 at Cobham junction and is served entirely by Class C minor roads (single track) which are unlimited (national speed limit) but which are used by a large amount of NMU's. These roads join the A2 via Half Pence Lane to Cobhambury and Batts Roads. At peak times and when there are hold-ups on the A2, traffic from the A2 migrates (rat runs) through the parish either from the A2 to A227, A228 to A227 or A2 to M20 via minor roads. When the A2 is	The Project's transport model is built in line with guidance from DfT – the Transport Analysis Guidance. The model has been assessed by an independent assessor within National Highways and has been accepted as suitable for assessing the impact of the Lower Thames Crossing on the highway network. See the 7.7 Combined Modelling and Appraisal Report. The 7.9 Transport Assessment (TA) contains outputs and analysis of both the construction and operational phases of the Project on the road network, including locally the A2, A227 and A228 as well as other key local roads. Section 7.6 of the TA sets out locations which are forecast to see either beneficial or adverse impacts as a result of the Project once in operation. The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
	stationary (which happens not infrequently) the village and approach roads become gridlocked.	local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes. The list of proposed monitoring locations is set out in The Wider Network Impacts Management and Monitoring Plan (WNIMMP) and further locations can be proposed by Highway Authorities.	
Design – Road, Tunnels, Utilities	Luddesdown Parish Council feel National Highways have consistently declined to accept responsibility to model the effects of increased traffic in their area. Their concerns were heightened by the restriction of the A2 from 4 lanes in each direction down to 2 lanes in the later stages of design - a design change not indicated in the 'ward impact summary' consultation document. Luddesdown Parish also express that they have difficulty in accessing underlying data during consultation - and in understanding what exactly is proposed: as was the case for the restriction of the A2 from 4 lanes in each direction to 2 lanes in each direction at the point where the project joins the A2).	The number of lanes has been altered as the proposed design splits A2 and M2 traffic (two lanes for the A2 and two for the M2, (which become four once lanes from the A122 Lower Thames Crossing merge). The Lower Thames Area Model (LTAM) has been built specifically to examine the forecast impacts of the Lower Thames Crossing on the road network. In areas close to the Project, the Applicant has included a significant level of detail and made use of the capabilities of the software to reflect local conditions.	Matter Not Agreed
Air Quality	The consultation documents (heat maps) on the topics of traffic and pollution have shown the effects on the area as blank - which is also the indication that there is no effect. We (the affected residents) need to know the effect	The air quality study area and assessment presented within Environmental Statement (ES) Chapter 5 Air Quality has been undertaken in accordance with Design Manual for Roads and Bridges LA 105. For Community Impact Consultation, the LTC Ward Impact Summaries (South of the Thames) for Shorne,	Matter Not Agreed

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Heading	Matter	The Applicant's response	Status
	and to have it taken into account when the application is considered.	Cobham and Luddesdown ward and the Operations Update presented the air quality impacts once the road is open. Based on the closest receptors, the air quality impacts were predicted to be negligible, and overall not significant as a result of the Project. The Community Impact Report submitted as part of the DCO application also summarises the air quality impacts within Shorne, Cobham and Luddesdown ward. As described in ES Chapter 5 Air Quality, the Project is not expected to have a significant air quality effect on human receptors, therefore mitigation is not required.	
Constructio n	Use of the area (that is under consideration for this development) is used for leisure activities and used during our daily work. Luddesdown are interested in how the project will change the area and how those effects are being mitigated.	The environmental impact of the Project and proposed mitigation is presented within the Environmental Statement and the Community Impact Report (6.1 for Shorne, Cobham and Luddesdown ward) submitted as part of the DCO application.	Matter Not Agreed

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Table 2.37 New and existing Matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Need for the Project	While local representations are principally concerned with the traffic and pollution effects of the project, as tax payers and part of the population who are the supposed beneficiaries from the scheme; we feel a more scientific and detailed approach should be taken towards setting, assessing and monitoring the scheme objectives (in measurable and quantitative terms).	The Applicant has set out how the project meets national policies and scheme objectives. The Planning Statement [Application Document APP-494] maps the project objectives to the National Policy Statement for National Networks (NPSNN) evidence and demonstrates the alignment between the policy and the project as a high level.	Open
Consultation and Engagement	With regard to consultation, there has been a complete absence of any quantitative feedback on any of the consultation responses post 2013. There was a summary of responses to the 2013 consultation but the absence of numbers in the subsequent 'you said we did' document was conspicuous.	The consultation in 2013 was undertaken by the Department for Transport (DfT). The Applicant undertook a non-statutory consultation in 2016 and the feedback was presented in Lower Thames Crossing Consultation 2016 – Analysis of findings report (Ipsos MORI, 2016) and Lower Thames Crossing – Response to Consultation 2017 (Highways England, 2017). The Applicant submitted a Consultation Report [**Application Documents APP-064** to **APP-069**] which provides both quantitative and qualitative analysis of the 2018 Statutory Consultation and subsequent non-statutory consultations between 2020 and 2022.	Open

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2.24 Lumen Technologies UK Limited

Introduction

2.24.1 Lumen Technologies UK Limited (Lumen Technologies) is a communications utility that owns 80% of the world's sub-sea fibre optic cables. The Lower Thames Crossing project will impact and affect two separate fibre optic cables connecting UK to France and Belgium. These are regarded by the UK Government as assets of national importance, transporting critical national security services between mainland Europe and the UK.

2.24.2 In 2022, the Applicant and Lumen Technologies prepared an SoCG. However, that was not submitted as part of the DCO. At DL 1, the SoCG remains under development and parties expect that an updated SoCG will be submitted at a later examination deadline.

Overview of matters raised in Lumen Technologies' RR

2.24.3 The Applicant has undertaken a detailed review of the matters raised in Lumen Technologies' RR and has identified new matters to be included in the SoCG.

Table 2.38 New Matters raised in RR, which are being addressed in the SoCG to be submitted at a subsequent deadline

Heading	Matter	The Applicant's response	Status
Deferment of Renewal and Betterment	The Network Relocation to accommodate Lower Thames Crossing requires Lumen Technologies to grant very costly additional discounts for Deferment of Renewal and Betterment, this is in addition to the standard 18 percent discount as required under NRWSA legislation. Lumen Technologies will therefore object to the Lower Thames Crossing project based on the additional discounts for Deferment or Renewal and Betterment for an asset and apparatus that Lumen Technologies would never have the need to replace or renew at any future time.	The Applicant considers that the provisions of the New Roads and Street Works Act 1991 apply and any previous agreements between the Applicant and Lumen Technologies do not set any precedents and turned on their unique set of circumstances. The Applicant is in active discussions with Lumen Technologies to come to a common position on this point. The Applicant considers that it is possible to reach a common position during the Examination.	Matter Not Agreed
Protective Provisions	Lumen Technologies have also requested additional Protective Measures due to the importance of the assets and services being at risk for the duration of the works.	The Applicant is in advanced discussions with Lumen on the modified protective provisions. The Applicant expects this to be resolved during the Examination.	Matter Under Discussion

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2.25 Maidstone Borough Council

Introduction

2.25.1 Maidstone Borough Council is a host authority in respect of the application and as such is a category 'B' local authority under section 43 of the Planning Act 2008. Under s.42(1)(b) of the Planning Act 2008, Maidstone Borough Council was notified of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.25.1 A request was made in the Rule 6 Letter for a new SoCG between the Applicant and Maidstone Borough Council. It should be noted that in 2022, the Applicant and Maidstone Borough Council were collaborating on an SoCG, that document was not submitted as part of the DCO application by mutual agreement. The SoCG remains under development, with Maidstone Borough Council requesting that the document be submitted at a later deadline.

Overview of matters raised in Maidstone Borough Council's RR

2.25.2 The matters included some that are the same or fundamentally similar to those addressed within the SoCG that was in development as part of the DCO application, along with an explanation of the Applicant's position on them. Table 2.39 sets out those issues.

2.25.3 The RR also contained new matters that were not yet addressed within the SoCG. Those matters are set out in Table 2.40.

Table 2.39 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Need for the Project	Need for the Project	2.1.1	This SoCG was not submitted at DL 1 and so no link to an application version is available.
Charging	Charging Regime	2.1.4	
Traffic and economics	Local plan growth	2.1.5	
Wider Network Impacts	Non-Project highway improvement	2.1.6	
Design – Road, Tunnels, Utilities	Non-Project highways improvements	2.1.7	
Air quality	Project design and mitigation	2.1.8	
Nitrogen Deposition	Site selection and surveying	2.1.9	
	Detailed design/ management plans/ Implementation	2.1.10	

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Table 2.40 New Matters raised in RR, which are addressed in an SoCG to be submitted at a later deadline

Heading	Matter	The Applicant's response	Status
Consultation and Engagement	*MBC has also worked jointly with National Highways on the preparation of a Statement of Common Ground (SoCG). However, whilst the latest draft SoCG was signed by the Council's executive in October 2022 a countersignature from National Highways has not been forthcoming. National Highways have informed MBC that the SoCG was not signed in time for it to be submitted at the DCO application stage. MBC would like to point out that there was insufficient time provided for it to agree the wording of the SoCG and to obtain sign-off under its Cabinet system within the timescales provided by National Highways. MBC made this clear to National Highways at that time. In light of the above, MBC understands that the SoCG has not been included with the submission documents for the DCO application and it is not currently in the Examination Library. MBC therefore wishes to make the following representations which reflect its key areas of interest and concern with respect to the project.*	**This matter has been added to the SoCG as matter 2.1.11. In summary, the Applicant's response is as follows:** The Applicant and Maidstone Borough Council worked together in 2022 to agree content for a Statement of Common Ground (SoCG), with a view to this SoCG forming part of the Applicant's application for development consent for the Project. In October 2022, the council indicated that it preferred not to have the SoCG submitted because the document had not had sign-off by the relevant internal council authorities. There was an option for the SoCG to be submitted unsigned as part of the application, but the council nonetheless requested that it should not be submitted at this stage. A signed-off version of the SoCG was received from the council after the application was submitted and, as such, was not published on the Planning Inspectorate website with the rest of the application. A signed-off version for the council's internal use was supplied to Maidstone Borough Council following application, as requested. The Applicant advised Maidstone Borough Council that the next opportunity to submit the SoCG to the Examining Authority would be at Examination DL 1.	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
Wider Network Impacts	*MBC supports in principle the changes National Highways have made to the route since the preferred route announcement was made in 2017, particularly the widening of the M2 and A2 to Junction 1 and the redesign of the M2/A2 junction in order to cut journey times and improve junction safety. Notwithstanding this support, MBC considers that additional wider network improvements are required to mitigate impacts on the local road network, as set out above.*	**This RR has been addressed in the SoCG under Matter 2.1.6, under the Wider Network Impacts heading, which will be submitted at a later deadline.** The Applicant recognises that as a result of the Lower Thames Crossing opening, people will choose to make different journeys. In many places on the network, and within Kent, this will lead to beneficial impacts on the network, and in some cases will lead to adverse impacts. Overall, the benefits on the road network outweigh the adverse impacts, and this is reflected in the positive economic benefit of the Project within Kent. The Applicant has identified the adverse impacts on traffic flows across the road network, and this assessment has been set out in the Transport Assessment [**Application Document APP-529**]. Each of these impacts has been assessed and considered against policy requirements as set out in Appendix F of the Transport Assessm**ent [Application Docu**m**ent APP-535**]. The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies opportunities to further optimise the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes. This process is set out in the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**], which provides information about the proposed traffic monitoring. The Applicant recognises the case for developing a scheme to improve the operations of Bluebell Hill and is continuing to support Kent County Council as it brings forward its improvement scheme. The Project does not require the emerging improvements at Bluebell Hill to deliver the benefits set out in the A122 Lower Thames Crossing application. Similarly, the case for this scheme is not dependent on the opening of the Project.	

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2.26 Marine Management Organisation

Introduction

2.26.1 The Marine Management Organisation (MMO) is an executive non-departmental public body in the UK established under the Marine and Coastal Access Act 2009. It is a prescribed consultee under the Planning Act 2008 to advise developers during pre-application on those aspects of a project that may have an impact on the marine area or those who use it. The MMO was notified under s42(1)(aa) of the Planning Act 2008 of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.26.2 The Applicant and MMO prepared an SoCG that was submitted as part of the DCO Application [**Application Document APP-098**].

While the Applicant has worked closely with MMO in the preparation of an updated SoCG, MMO has not yet been able to complete its review of the updated SoCG in line with its governance process. The SoCG remains under development and parties expect that an updated SoCG will be submitted at a later examination deadline.

Overview of matters raised in MMO's RR

2.26.3 The matters included some that are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. Table 2.41 sets out those issues and provides references within that SoCG. The RR also contained new matters that are not yet addressed within the SoCG. Table 2.42 summarises those issues and provides the Applicant's response.

Table 2.41 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
DCOs and Consents	Deemed Marine Licence	2.1.1, 2.1.2, 2.1.3, 2.1.4	[**Application Document APP-098**]
Marine biodiversity	Methodology and baseline data	2.1.6, 2.1.7, 2.1.8	
	Assessment of potential effects	2.1.10, 2.1.11, 2.1.12, 2.1.13, 2.1.14, 2.1.15, 2.1.16, 2.1.17, 2.1.20, 2.1.21, 2.1.24	
	Mitigation	2.1.25	

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Table 2.42 New Matters raised in RR, which are addressed in the SoCGs to be submitted at a later deadline

Heading	Matter	The Applicant's response	Status
DCO and Consents	*The MMO is unclear how Article 8 of the DCO interacts with the interpretation of "undertaker" at paragraph 1(1) of the DML. The MMO's position is that the DML should be regulated using powers in the 2009 Act including transfer of the order (section 72 of the 2009 Act).* […] *In considering the proposed provisions of Article 8 DCO, these provisions no longer require the licence holder (undertaker) to make an application for a licence to be transferred it is simply their decision to make the transfer – this is a clear departure from the Marine and Coastal Access Act (MCAA) 2009. Further the newly introduced process involves the Secretary of State providing consent to the transfer, rather than the MMO as the regulatory authority for marine licences considering the merits of any application for a transfer.*	**This will be added as a new matter in the SoCG as 2.1.26 (DL 2) under 'DCO and Consents'. In summary, the Applicant's response is as follows:** The Applicant notes the comment on the need to allow the MMO to consider the merits of any application for a transfer. The Applicant proposes the following amendment, in line with other DCOs, to ensure the MMO is consulted on any transfer of the deemed marine licence (DML): "*The Secretary of State must consult the MMO before giving consent under paragraph (1) to the transfer or grant to another person of the benefit of the provisions of the deemed marine licence*."	Matter Under Discussion
	Article 8(1)(a) specifies the transfer of the whole of a DML and Article 8(1)(b) specifies a grant to a lessee for an agreed period. *There is no mechanism in the DCO or MCAA for a marine licence to be 'leased', specifically there is no provision for the licence 'reverting' to the licence holder after the agreed lease period. It would be necessary to vary the licence to change the licence holder details at the beginning of the agreed period and then again at the end of the agreed period.*	**This will be added as a new matter in the SoCG as 2.1.27 (DL 2) under 'DCO and Consents'. In summary, the Applicant's response is as follows:** The Applicant proposes to amend Article 8 to include a requirement to consult the MMO on any transfer. The MMO could then make such representations to the Secretary of State if the Applicant sought a transfer incompatible with the Marine and Coastal Access Act 2009.	Matter Under Discussion
	The MMO requested clarification of the Project's position regarding the application of Section 72 of the MCAA generally to Schedule 15, the DML and	**This will be added as a new matter in the SoCG as 2.1.28 (DL 2) under 'DCO and Consents'.**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	specifically in relation to sections 72(8) and (9) of the MCAA.	The Applicant agrees that these two provisions should not conflict. The Applicant proposes the following amendment to the DML, in line with other DMLs, to clarify this: "*The provisions of sections 72 (variation, suspension, revocation and transfer) of the 2009 Act apply to this licence except that the provisions of section 72(7) and (8) relating to the transfer of the licence only apply to a transfer not falling within article 8.*"	
	It is appropriate to state the maximum length [of the buried pipeline]*, rather than use the word "approximate".* *Furthermore, it is essential that this maximum length has been considered within the ES. In addition, for consistency, units of measurement should be the same where possible and appropriate. In this case the sentence should state "400m" and "1m" rather than 1000mm.*	**This will be added as a new matter in the SoCG as 2.1.29 (DL 2) under 'DCO and Consents'. In summary, the Applicant's response is as follows:** The Applicant assessed 400m and 1m in the ES as maximums in line with the discharge papers. The use of 'approximate' was agreed by all prior to drafting. The Applicant will update the units to 400m and 1m.	Matter Under Discussion
	References to "intertidal zone" should be amended to state that this is the area between the normal tidal limit and 1 nautical mile.	**This will be added as a new matter in the SoCG as 2.1.30 (DL 2) under 'DCO and Consents'.** The Applicant proposes amending to the following, in accordance with MMO definitions: '"Intertidal area" means the area between the level of mean high water springs and the level of mean low water springs.'	Matter Under Discussion
	[References to] *"Marine Noise Register" should be amended to "Marine Noise Registry".*	**This will be added as a new matter in the SoCG as 2.1.31 (DL 2) under 'DCO and Consents'.**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		The Applicant notes this and will make this amendment on the next draft.	
	The MMO's position is that the DML should be regulated using the powers in the MCAA including transfer of the order (section 72 of the MCAA 2009).	**This will be added as a new matter in the SoCG as 2.1.32 (DL 2) under 'DCO and Consents'.** The Applicant will incorporate the section 72 wording suggested to make clear that section 72 continues to apply to all transfers other than those authorised by Article 8.	Matter Under Discussion
	The MMO requested clarification as to where the "northern portal work area" is.	**This will be added as a new matter in the SoCG as 2.1.33 (DL 2) under 'DCO and Consents'.** The Applicant proposes amending to "northern tunnel entrance compound" for clarity. This location is shown in Figure 2.5 of the ES [**Application Document APP-169**]. There are numerous land parcels associated with this compound's area, which can be found in the Land Plans Volume B, accepted at the discretion of the Examining Authority (see sheets 16, 17 and 20) [**Additional Submission AS-008**]	Matter Under Discussion
	The measurements given at paragraph 5(1)(a)(i) should be the maximum measurements, as considered within the ES, not an approximate. Furthermore, specific reference should be given to length and width.	**This will be added as a new matter in the SoCG as 2.1.34 (DL 2) under 'DCO and Consents'. In summary, the Applicant's response is as follows:** The Applicant proposes to add maximum pipeline dimensions as outlined above, updating the units to 400m in length and 1m in diameter.	Matter Under Discussion
	The MMO requested that "Tunnel operation" and "northern tunnel portal site", as referred to within paragraph 5(1)(b)(ii), should be defined, alongside	**This will be added as a new matter in the SoCG as 2.1.35 (DL 2) under 'DCO and Consents'.**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	"Coal House Point" as referred to within paragraph 5(1)(c).	The Applicant will discuss the potential definition of "tunnel operation" further with the MMO as it was intended to have its ordinary meaning (in the context it is used). A definition is not currently proposed but the Applicant welcomes further input from the MMO on this. The Applicant proposes to amend "northern tunnel portal site" to "northern tunnel entrance compound". This location is shown in Figure 2.5 of the ES (see page 5 of 11) [**Application Document APP-169**]. There are numerous land parcels associated with this compound's area, which can be found in the Land Plans Volume B, accepted at the discretion of the Examining Authority (see sheets 16, 17 and 20) [**Additional Submission AS-009**]. Coalhouse Point is the HRA mitigation area which requires a water supply from the River Thames. The two land plots that are associated with this mitigation area are: 19-09 and 19-37. This information can be found in the Land Plans Volume B, accepted at the discretion of the Examining Authority (see sheets 16, 17 and 20) [**Additional Submission AS-009**]. An updated definition will be provided in the next draft.	
	The MMO requested each of the sets of coordinates for each of the work areas at 5(2)(a)-(c) to be referenced at the relevant provisions at 5(1)(a)-(c).	**This will be added as a new matter in the SoCG as 2.1.36 (DL 2) under 'DCO and Consents'. This will be added as a new matter in the SoCG as 2.1.36 (DL 2) under 'DCO and Consents'.** The Applicant acknowledges the point around coordinates and is currently reviewing the need	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		for these. The Applicant will update the MMO shortly.	
	The MMO requested the word "approximately", as used within paragraph 5(2)(a), to be removed or for the parameters of the word "approximately" to be defined.	**This will be added as a new matter in the SoCG as 2.1.37 (DL 2) under 'DCO and Consents'. This will be added as a new matter in the SoCG as 2.1.36 (DL 2) under 'DCO and Consents'.** Approximately is reasonable in the circumstances given the usage of small dimensions. These dimensions have been assessed in the ES. The Applicant welcomes further discussions with the MMO on this to resolve the MMO's concerns.	Matter Under Discussion
	Paragraph 5(2)(a) refers to "drainage pipeline and outfall" and the MMO requested clarification as to whether this is the subtidal outfall structure at 5(1)(a). The language used regarding this should be consistent to ensure clarity.	**This will be added as a new matter in the SoCG as 2.1.38 (DL 2) under 'DCO and Consents'. This will be added as a new matter in the SoCG as 2.1.36 (DL 2) under 'DCO and Consents'.** The Applicant confirms that these are one and the same. The Applicant suggests using 'drainage pipeline and outfall' to be consistent. The draft DML will be updated accordingly.	Matter Under Discussion
	The MMO requested clarification as to how the terms used under "Work area" at 5(2) relate to the provisions.	**This will be added as a new matter in the SoCG as 2.1.39 (DL 2) under 'DCO and Consents'.** The Applicant confirms that this refers to the operational discharge, as per 5(1)(b)(i).	Matter Under Discussion
	The MMO suggests the use of "working days" at paragraph 9(3)(b) be changed to "business days" to ensure consistency.	**This will be added as a new matter in the SoCG as 2.1.40 (DL 2) under 'DCO and Consents'.**	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		The Applicant notes this comment. The draft DML will be updated accordingly.	
	The condition at paragraph 13 should end at "marine environment" to bring this in line with conditions included in licences issued under the MCAA.	**This will be added as a new matter in the SoCG as 2.1.41 (DL 2) under 'DCO and Consents'.** The Applicant is content with this proposed change. The draft DML will be updated accordingly.	Matter Under Discussion
DCO and Consents	Paragraph 15 refers to a "water management pipeline" and the MMO requested clarification as to the works of the authorised development at paragraph 5 that this relates to.	**This will be added as a new matter in the SoCG as 2.1.42 (DL 2) under 'DCO and Consents'.** The Applicant can confirm that this relates to the construction drainage pipeline and outfall in paragraph 5(2)(a).	Matter Under Discussion
	The MMO requested minor wording amendments at paragraph 18 to ensure consistency with marine licences issued under the MCAA. As such, this sentence should read: "*The undertaker must inform the MMO in writing of the completion of the last marine activity no more than 10 business days following the completion of the said activity.*"	**This will be added as a new matter in the SoCG as 2.1.43 (DL 2) under 'DCO and Consents'.** This drafting is now agreed. The draft DML will be updated accordingly.	Matter Under Discussion
	For coastal process impact prevention, the DML should contain provisions guaranteeing flood defence monitoring (ES Chapter 14, paragraph 14.15.10g) and a construction drainage plan (ES Chapter 14, paragraph 14.5.10f.) to be in place. *The MMO believes the latter to be covered under paragraphs 8(1) and 8(2) (surface and foul water drainage) but is uncertain as to the provisions regarding the flood defences under Part 9 of the draft DML. The MMO notes, however, this within the remit of*	**This will be added as a new matter in the SoCG as 2.1.44 (DL 2) under 'DCO and Consents'.** The Applicant notes this comment. Flood defences are covered in the Environment Agency Protective Provisions. Paragraph 117 of the Environment Agency Protective Provisions is in an agreed form.	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	the Environment Agency and defers to their comments in this respect.		
DCO and Consents	*The MMO does not agree with the proposed timescales for returns as currently set out in Articles 10(1) and 11(1) of the draft DML.* The MMO requested that the timeframes at 10(1) and 11(1) of the DML are amended to 13 weeks, adding that the MMO will endeavour to approve documents as soon as possible.	**This will be added to existing matter 2.1.2 in the SoCG under 'DCO and Consents' at DL 2. In summary, the Applicant's response is as follows:** This matter is linked to the wider matter of time limit(s) for approval and notice of determination (**2.1.2** of the SoCG). While the Applicant notes the MMO's concerns, the Applicant considers the current timescales appropriate due to the limited nature of its works in the marine area, and the potential impact to its programme.	Matter Not Agreed
	The MMO is unclear how Article 64 of the DCO interacts with paragraph 23 of the DML. The MMO said that it strongly disputed the requirement for an arbitrator, as any matter in relation to the DML should not be subject to arbitration.	**This matter is linked to the wider matter of arbitration – paragraph 23 (2.1.3 of the SoCG).** **This will be added to existing matter 2.1.3 in the SoCG under 'DCO and Consents' at DL 2. In summary, the Applicant's response is as follows:** Paragraph 23 of the draft DML clearly states that the arbitration provisions set out in Article 64 of the DCO do not apply. The Applicant does not consider any further amendment necessary in relation to arbitration.	Matter Under Discussion

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2.27 Medway Council

Introduction

2.27.1 Medway Council is a host authority in respect of the application and as such is a category 'B' local authority under section 43 of the Planning Act 2008. Under s.42(1)(b) of the Planning Act 2008, Medway Council was notified of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.27.2 The Applicant and Medway Council prepared an SoCG that was submitted as part of the DCO Application [**Application Document APP-128**].

2.27.3 All issues raised in the council's RR were represented within the SoCG.

Overview of matters raised in Medway Council's RR

2.27.4 The matters included some that are the same or fundamentally similar to those addressed at DCO Application, along with an explanation of the Applicant's position on them. Table 2.43 sets out those issues and provides references within that SoCG.

Table 2.43 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Need for the Project	Need for the Project	2.1.1	[**Application Document APP-128**]
Charging	Local Resident Discount Scheme	2.1.6	
Traffic and Economics	Local plan growth	2.1.7	
Wider Network Impacts	WNI approach	2.1.8	
	Monitoring approach	2.1.9	
Air Quality	Assessment methodology	2.1.11, 2.1.12	
	Assessment of likely significant effects /	2.1.13	
Material Assets and Waste	Assessment methodology	2.1.14, 2.1.16, 2.1.17	
	Project design and mitigation	2.1.15	
Nitrogen Deposition	Site Selection and Surveying	2.1.18 2.1.19	
	Detailed Design / Management Plans / Implementation	2.1.20	

2.27.5 There were no new matters raised in the RR.

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2.28 Meopham Parish Council

Introduction

2.28.1 Meopham Parish Council provides a number of services for the village in conjunction with Gravesham Borough Council and Kent County Council. Meopham Parish Council is a prescribed consultee for the Project, under s42(1)(a) of the Planning Act 2008.

2.28.2 Following the request in the Rule 6 Letter for a new SoCG between the Applicant and Meopham Parish Council, the Parties have prepared an SoCG that was submitted at DL 1.

2.28.3 All of the issues raised in the council's RR are now represented within the SoCG in Table 2.44.

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Overview of matters raised in Meopham Parish Council's RR

Table 2.44 New matters raised in RR, included in the SoCG at DL 1

Heading	Matter	The Applicant's response	Status
Need for the Project	Meopham Parish Council believe that the Project does not represent 'value for money' and that the business case has weakened since the COVID-19 pandemic due to the increase in homeworking resulting in less commuter journeys.	The Project is expected to deliver a range of benefits including congestion relief at the Dartford Crossing. The improved connectivity across the River Thames and reduced journey times would help local businesses to boost productivity, supporting sustainable local development and regional economic growth. The Project's Benefit Cost Ratio is positive, therefore demonstrating value for money. During 2020 and 2021, the travel restrictions associated with the COVID-19 pandemic resulted in short-term changes to travel patterns. However, the data collated in the first part of 2022 shows that usage of the Dartford Crossing has returned to at least 2019 levels, showing the demand has returned following the COVID-19 pandemic. Please refer to Section 5.7 of the Transport Assessment. For more information about the Scheme Objectives and economic benefits, see the Need for the Project and Combined Modelling and Appraisal Report Appendix D: Economic Appraisal Package: Economic Appraisal Report. Following a meeting with Meopham Parish Council on 5 June 2023 whereby the Applicant provided further clarity on matters	Matter Agreed

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Heading	Matter	The Applicant's response	Status
		of concern and gave direction to specific documents of the Application, Meopham Parish Council confirmed following its full Parish Council meeting that it was now content with the information provided by the Applicant.	
Wider Network Impacts	Meopham Parish Council are concerned that the impacts on the surrounding roads such as the A227 have not been adequately modelled and fear the impact the crossing would have on the local communities served by these surrounding roads.	The Project's transport model is built in line with the Transport Analysis Guidance published by the Department for Transport. The model has been assessed by an independent assessor within National Highways and has been accepted as suitable for assessing the impact of the Lower Thames Crossing on the highway network. Please see the Combined Modelling and Appraisal Report. The Transport Assessment contains outputs and the analysis of both the construction and operational phases of the Project on the road network, including the A227 and other key roads within the parish. Section 7.6 of the Transport Assessment sets out locations which are forecast to see either beneficial or adverse impacts as a result of the Project once in operation. No adverse impacts on the A227 within the parish have been identified. Beneficial impacts on two A227 junctions at the southern end of Hook Green have been identified.	Matter Not Agreed
Terrestrial biodiversity	Meopham Parish Council are concerned how the Project will destroy and negatively impact ancient woodland, trees, hedgerows, and the wider Green Belt area. Meopham Parish Council believe this will	Minimising the adverse impacts of the Project on the environment is one of the Scheme Objectives (see the Need for the Project). At every step of the Project's lifecycle,	Matter Agreed

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Heading	Matter	The Applicant's response	Status
	have a devastating impact on wildlife and habitats, including protected species.	consideration has been given and efforts have been made to reduce the environmental impacts, while still fulfilling the needs of the Project. The Applicant has followed the mitigation hierarchy of 'avoid, minimise, restore and compensate' to protect the environment in which the Project would be situated and in keeping with industry best practice. The Project is designed to maximise biodiversity value wherever possible. The biodiversity value generated by the Project is described in Environmental Statement (ES) Chapter 8: Terrestrial Biodiversity and set out in detail in ES Appendix 8.21: Biodiversity Metric Calculations. ES Chapter 8: Terrestrial Biodiversity and ES Figure 2.4: Environmental Masterplan Sections 1 & 1A (1 of 10) and Section 2 (2 of 10) show the areas of woodland creation that are being provided south of the river to help offset the adverse effects. For Meopham, there are some indirect impacts from air quality on designated sites (but no physical loss of habitats). The environmental assessment is based on a realistic worst-case scenario (as required by the Infrastructure Planning Environmental Impact Assessment 2017 Regulations), and the Applicant would continue to work to further reduce impacts through the detailed design phase for the Project.	

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Heading	Matter	The Applicant's response	Status
		The Project is located within the Green Belt and is considered to be inappropriate development as a whole. Linear nationally significant infrastructure projects often pass through designated Green Belt as recognised within the National Policy Statement for National Networks. The Applicant's view is that there are very special circumstances for the Project as the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Planning Statement Appendix E – Green Belt [**Application Document APP-500**] provides an assessment of the Project against green belt planning policy and was submitted in support of the DCO application. Following a meeting with Meopham Parish Council on 5 June 2023 whereby the Applicant provided further clarity on matters of concern and gave direction to specific documents of the Application, Meopham Parish Council confirmed following its Parish Council meeting that it was now content with the information provided by the Applicant.	
Population and human health	Meopham Parish Council are disappointed that there is insufficient provision for public transport as part of the Project.	The Project would create opportunities for operators to develop new local and regional bus services, by providing new connectivity between Kent, Thurrock and Essex. Identification and development of these routes is the responsibility of the relevant operators.	Matter Agreed

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Heading	Matter	The Applicant's response	Status
		Local buses would not have to pay the road user charge for the Project, thereby reducing operating costs for operators. The forecast impact of the Project during construction and operation is set out in Chapters 8 and 7, respectively, of the Transport Assessment. Following a meeting with Meopham Parish Council on 5 June 2023 whereby the Applicant provided further clarity on matters of concern and gave direction to specific documents of the Application, MPC confirmed following its PC meeting that it was now content with the information provided by the Applicant.	

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2.29 National Gas Transmission

Introduction

2.29.1 National Gas Transmission (NGT) (formerly known as National Grid Gas Plc) owns and operates the gas transmission network in England, Scotland and Wales. NGT is required to comply with the terms of its Gas Transmission Licence in the delivery of its statutory responsibility. Under section 9 of the Gas Act 1986, NGT has a statutory duty to maintain an 'efficient, co-ordinated and economical' network. NGT is a relevant Statutory Undertaker for the Project and was notified under s42(1)(a) of the Planning Act 2008 of the pre-application statutory consultation and subsequent phases of non-statutory consultation.

2.29.2 In 2022, the Applicant and NGT prepared an SoCG. However, that document was not submitted as part of the DCO application by mutual agreement. Since then, the parties have worked collaboratively to produce an SoCG, which has been submitted at DL 1.

Overview of matters raised in NGT's RR

2.29.3 The Applicant has undertaken a detailed review of all matters raised in the NGT's RR. The matters were largely all the same or fundamentally similar to those addressed within the SoCG. Table 2.45 sets out those issues and provides references within the SoCG. The RR also contained one new matter that has now been included in the SoCG submitted at Deadline 1, this matter can be seen in Table 2.46

Table 2.45 Matters raised prior to the RR Period and acknowledged within the SoCG

Heading	Topic	Item No.	Link
Development Consent Order and Consents	Acquisition of Land Rights and Book of Reference	2.1.1	This SoCG was not submitted at DL 1 and so no link to an application version is available.
	Tunnel boring machine and NGT Tunnel 24hr working	2.1.3 2.1.6	
	Phasing of Works and Division of Responsibility	2.1.7 2.1.9 2.1.10 2.1.16	
Design – Road, Tunnels, Utilities	Conflict of Design	2.1.11 2.1.12 2.1.14	
Protective Provisions	NGET require protective provisions to be included within the DCO to ensure that NGET's interests are adequately protected and to ensure compliance with relevant safety standards	2.1.17	

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Table 2.46 New Matters raised in RR, which is now addressed in the SoCG

Heading	Topic	The Applicant's response	Status
Removal of decommissioned gas apparatus	Following completion of each of the Proposed Diversions, NGT intends to decommission and subsequently remove the existing sections of pipeline and associated apparatus which form part of Feeder Main 5 and Feeder Main 18. Therefore, NGT requires confirmation from the Applicant that works to remove the decommissioned gas pipelines and associated apparatus have been appropriately assessed in the Environmental Statement and, where necessary, that additional land rights will be sought by the Applicant to enable the removal to take place.	The Applicant appreciates that there are two options with regard to the treatment of pipelines which are being decommissioned; option 1 being the decommissioning and removal of the pipeline, and option 2 being the decommissioning of the pipeline, retained in situ and capped or filled with a cementitious grout. With respect to Feeder Main 18, the Applicant requires that the parts of the pipeline in plots 4-54 and 11-5 [**Additional Submission AS-008**] are decommissioned and retained in situ. This land is to be permanently acquired by the Applicant and the removal of the pipe could be detrimental to the intended use of the land. With respect to Feeder Main 5, the Applicant has no objection in principle to the decommissioning and removal of those parts of the pipeline made redundant by the undertaking of the works numbers G2 and G4. The works to remove the decommissioned pipelines have been assessed as part of the ES, as communicated in the outline Site Waste Management Plan [**Application Document APP-337**]. The Applicant considers that sufficient land rights and powers are contained within the DCO and there is no reason to acquire additional rights to enable NGT to remove the decommissioned parts of the pipeline. This matter is subject to ongoing discussions between the parties, with a view to agree a common position during the Examination.	Matter Under Discussion

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2.30 National Grid Electricity Transmission

Introduction

2.30.1 National Grid Electricity Transmission (NGET) owns and operates the high-voltage electricity transmission network in England and Wales. The organisation is a relevant statutory undertaker for the Project and was notified by the Applicant of its pre-application statutory consultation and subsequent phases of non-statutory consultation.

2.30.2 In 2022, the Applicant and NGET prepared an SoCG. However, that document was not submitted as part of the DCO application by mutual agreement. Since then, the parties have worked collaboratively to produce an SoCG, which has been submitted at DL 1.

Overview of matters raised in NGET's RR

2.30.3 The Applicant has undertaken a detailed review of all matters raised in the NGET's RR. The matters were all the same or fundamentally similar to those addressed within the SoCG. Table 2.47 sets out those issues and provides references within the SoCG.

Table 2.47 Matters raised prior to the RR Period and acknowledged within the SoCG

Heading	Topic	Item No.	Link
Development Consent Order and Consents	Clarification required on transfer of land/rights.	2.1.2 2.1.5	This SoCG was not submitted at DL 1 and so no link to an application version is available.
	Phasing of Works and Division of Responsibility	2.1.14 2.1.18 2.1.16 2.1.20	
Design – Road, Tunnels, Utilities	Conflict of Design	2.1.29	
Protective Provisions	NGET require protective provisions to be included within the DCO to ensure that NGET's interests are adequately protected and to ensure compliance with relevant safety standards	2.1.32 2.1.34	

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2.31 Natural England

Introduction

2.31.1 Natural England is a non-departmental public body. Its statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a prescribed consultee under section 42(1)(a) of the Planning Act 2008 and was notified of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.31.2 The Applicant and Natural England prepared an SoCG that was submitted as part of the DCO Application [**Application Document APP-099**].

2.31.3 The Applicant has worked closely with Natural England in the preparation of an updated SoCG. However, Natural England has not yet been able to complete its review of the updated SoCG in line with its governance process and it will therefore be submitted at the next Deadline.

Overview of matters raised in Natural England's RR

2.31.4 The Applicant has undertaken a detailed review of all matters raised in Natural England's RR. The matters included some that are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them. Table 2.48 sets out those issues and provides references within that SoCG. The RR also contained matters not addressed within the DCO Application SoCG. Table 2.49 summarises those issues and provides the Applicant's response, cross-referencing to the Statement of Common Ground due to be submitted at DL 2. Matters addressed outside of the SoCG are set out in Table 2.50.

Table 2.48 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
DCO & Consents	Securing mechanisms	2.1.2	[**Application Document APP-099**]
	Co-ordinating parallel consents and other AA	2.1.4	
Route Selection, Model Alternatives & Assessment of Reasonable Alternatives	Impacts	2.1.8, 2.1.9	
Land and Compulsory acquisition	Common land	2.1.13	
	Post-development management	2.1.21	

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Heading	Topic	Item No.	Link
Environmental Impact Assessment (EIA) Methodology	BNG	2.1.22, 2.1.23	
Landscape and visual	Visual	2.1.29	
	Tranquillity	2.1.32	
	Green bridges	2.1.35, 2.1.36, 2.1.37, 2.1.38, 2.1.39	
Terrestrial biodiversity	Scope of assessment	2.1.43	
	General methodology	2.1.44	
	Invertebrates	2.1.48, 2.1.49, 2.1.50, 2.1.54, 2.1.55	
	Terrestrial biodiversity	2.1.56	
	Woodland	2.1.60, 2.1.65	
	Birds	2.1.66, 2.1.68	
	Protected species licensing	2.1.71, 2.1.72, 2.1.74, 2.1.75	
Habitats Regulations Assessment (HRA)	HRA Screening	2.1.88, 2.1.89, 2.1.90, 2.1.91	
	HRA Appropriate Assessment	2.1.92, 2.1.93, 2.1.94	
Nitrogen Deposition	Compensation	2.1.98, 2.1.99	

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Table 2.49 New Matters raised in RR, which will be addressed in the SoCG to be submitted at DL 2

Heading	Topic	The Applicant's response	Status
DCO and consents	*Natural England is concerned that a number of the securing mechanisms for necessary mitigation measures do not provide a sufficient degree of certainty in relation to their delivery at present. In addition, there are a number of caveats throughout the application detailing that key mitigation measures will be delivered 'where reasonably practicable', for example.* *This combined with a significant amount of detail on the mitigation and compensation measures being deferred to the detailed design stage provides a degree of uncertainty that the mitigation and compensation measures will be delivered and achieve their aims.*	**This will be added as a new matter in the SoCG between Natural England and the Applicant as matter 2.1.102 (DL 2) under the headings 'DCO and consents', 'securing mechanisms'. This is a Matter Not Agreed.** The draft DCO states that the authorised development must be designed in detail and carried out in accordance with the Design Principles and the preliminary scheme design, unless otherwise agreed in writing. The wording maintains a degree of flexibility for the detailed design to respond to practical design considerations. However, the Design Principles would ensure that the underlying requirements of each principle are met, subject to any practical limitations that could not be reasonably overcome.	Matter Not Agreed
Population and Human Health - Walkers, Cyclists and Horse riders	*Where developments, such as the Lower Thames Crossing, affect the England Coast Path, the National Trail should be protected and enhanced with any changes to the route requiring a Variation Report approved by the Secretary of State. It is unclear from document 6.1 Environmental Statement Chapter 13 – Population and Human Health and accompanying appendices, how the impacts to the England Coast Path have been fully mitigated during both the construction and operational phases of the project.*	**This will be added as a new matter in the SoCG between Natural England and the Applicant as matter 2.1.101 (DL 2) under the headings 'Population and human health', 'walkers, cyclists and horse riders'.** **This is a Matter Under Discussion subject to Natural England's review of the Applicant's response.** A section of the existing route of the England Coast Path (this section is referred to locally as the Two Forts Way or Footpath 146) will be upgraded and widened where appropriate	Matter Under Discussion

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Heading	Topic	The Applicant's response	Status
	During the construction and operational phases, the connectivity of the National Trail should be maintained. Any temporary route suggested should also be suitable (safe and accessible) for significant pedestrian traffic.	(within the Order Limit Boundary) and be designated as a pedestrian-cycle track in readiness for similar future improvements (by others) to the west and east, as detailed in the Design Principles S9.19 [**Application Document APP-516**] and Project Design Report - Part E - Design for Walkers, Cyclists and Horse Rider**s [Application Documen**t **APP-512**]. Footpath 146 has been identified as being subject to two temporary closure periods during the construction phase, both of which would be short in duration (between 4-6 weeks) and for both periods a replacement route is already available to the north of Coalhouse Fort. As such both temporary closures are assessed as having a neutral effect (as set out in Table 13.66 of ES Chapter 13: Population and Human Health [**Application Document APP-151**] and within the ES Addendum submitted at DL 1.	
Landscape and visual	Natural England expressed a concern that they could not fully assess the nature and scale of the impacts detailed within the Landscape and Visual Effects Assessments from the visualisations provided in the Environmental Statement Figures 7.16 to 7.19.	**This issue will be added to the existing SoCG matter 2.1.27 at DL 2, under the heading 'Landscape and visual', 'impacts', which is a Matter Under Discussion.** The Applicant shared draft landscape cross-sections through the M2/A2/A122 Lower Thames Crossing junction with Natural England on 10 May 2023 to support this ongoing engagement.	Matter Under Discussion

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Heading	Topic	The Applicant's response	Status
Population and Human Health, WCH	*Natural England noted that a number of new and diverted public rights of way are proposed within the Shorne and Ashenbank Woods SSSI to the south of the A2 which also requires surfaced tracks to be installed.* […] *The Environmental Statement has not provided an assessment of the potential for direct and indirect impacts from these proposals to the SSSI resulting from factors such as increased recreational activity and loss of habitat to the surfacing, for example.*	**This issue will be added to the existing SoCG matter 2.1.80 at DL 2, under the heading 'Landscape and visual', 'impacts', which is a Matter Under Discussion. In summary, the Applicant's response is as follows:** The Applicant issued a technical note to Natural England on this matter on 7th July 2023 to correct the omission in the ES regarding Public Rights of Way in Shorne and Ashenbank Woods. This report will also be submitted at Examination DL 1 as an addendum to the ES.	Matter Under Discussion

Table 2.50 New and Existing Matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Terrestrial Biodiversity	*The Terrestrial Biodiversity chapter of the Environmental Statement at table 2.2 states that the Mucking Flats and Marshes SSSI lies 0m (within Order limits). Paragraph 8.6.229 also comments that the SSSI lies 'immediately adjacent'.* *We note that in places the two boundaries lie close to each other, but Natural England was not previously aware that there was any direct overlap between the Order limits and the SSSI.*	This is an error in the DCO Application. Mucking Flats SSSI is located adjacent to, not within, the Order Limits. This will be submitted as a correction at DL 1.	Closed

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2.32 Network Rail Infrastructure Limited

Introduction

2.32.1 Network Rail Infrastructure Limited is a key Stakeholder in respect of the application and the Applicant is seeking to reach Agreement vian SoCGs and Protective Provisions.

2.32.2 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.

2.32.3 The Applicant and Network Rail Infrastructure Limited prepared an SoCG that was submitted as part of the Oct 2022 application [**Application Document APP-111**].

Overview of matters raised in Network Rail Infrastructure Limited RR

2.32.4 The Applicant has undertaken a detailed review of all matters raised by Network Rail Infrastructure Limited RR.

2.32.5 The matters included in Table 2.51 below are the same as those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them.

Table 2.51 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Consultation and Engagement	Consultation information	Appendix A - A.1	[**Application Document APP-111**]
Land and compulsory acquisition	Acquisition of Network Rail's land	2.1.1	
Design – Road, Tunnels, Utilities	Key Interfaces with Network Rail's Railway	2.1.2	
	Network Rail Asset Protection requirements	2.1.3	
Geology and Soil	Monitoring, Soil removal & Culverts	2.1.4, 2.1.5, 2.1.6	
Protective Provisions	Standard Form, Reference to Asset Agreements & Consent to exercise DCO powers	2.1.8, 2.1.9, 2.1.10	

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2.32.6 The RR contained one new matter that is not yet addressed within the SoCG. The following table summarises this single issue and provides the Applicant's response.

Table 2.52 New Matters raised in RR, which will be addressed in the SoCG to be submitted at a subsequent deadline

Heading	Topic	The Applicant's response	Status
Construction	Network Rail concerns to the additional use of their level crossings and overbridges	The Applicant will continue to engage with Network Rail about the details of the proposed works on and over the Plots for Network Rail to analyse. This will be added as a new matter in the SoCG as **2.1.12 (DL 1)** under **'Construction'.**	Matter Under Discussion

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2.33 NHS Kent and Midway Integrated Care Board

Introduction

2.33.1 A request for an SoCG between the Applicant and the NHS Kent and Medway Integrated Care Board (NHS Kent and Medway ICB) was made by the Examining Authority in the notification of Preliminary Meeting (Rule 6 Letter) [**PD-013**].

2.33.2 At this stage, NHS Kent and Medway ICB have not made a decision on whether they would like to submit an SoCG, but have expressed an interest in engaging further on matters raised in their RR. In the meantime, the Applicant has undertaken a detailed review of all the matters raised in the NHS Kent and Medway ICB's RR.

Overview of matters raised in NHS Kent and Medway ICB's RR

2.33.3 The Table 2.53 sets out those issues and the Applicant's response. It is noted that this table will be the basis of a future SoCG, should NHS Kent and Medway ICB decide that they would like to draft an SoCG with the Applicant.

Table 2.53 Matters raised in the RR which will be acknowledged within an SoCG

Heading	Topic	The Applicant's Response	Link
Population and Human Health	Construction workforce impacts on health services	The Project's Assessment of Human Health aims to reduce the impacts of both construction and operation on local communities. Construction workforce numbers are estimated to peak at 4,514 in 2027 (total for area to the north and south of the Thames). Assumptions indicate that 35% of the workforce will live at home, meaning approximately 1,580 workers are likely to be currently registered with local GP practices. The remaining 2,934 construction workers are likely to be additional to the area and may require access to primary healthcare services.	N/A as no SoCG was submitted with the application
	Construction-related illnesses	Commitments are included in the Project's Register of Environmental Actions and Commitments (REAC) relating to the provision of a range of medical and occupational healthcare services (including onsite facilities) for the construction workforce. These requirements and services are detailed in REAC Commitment PH002 and include the Thriving at Work criteria, and	

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Heading	Topic	The Applicant's Response	Link
		innovative proposals for health campaigns and services.	
	Impact of traffic flow on air quality	A comprehensive air quality assessment has been undertaken for the Project to assess impacts during construction and operation. This assessment considered impacts on human receptors based on compliance with government air quality objectives and limit values set to protect human health. During construction, National Highways has identified measures for contractors to follow that would ensure that construction phase dust and exhaust emissions are controlled. The REAC included in the CoCP, outlines the construction dust mitigation measures that will be implemented by the contractor to ensure that the impacts of construction dust emissions are not significant in relation to effects such as soiling and compliance with Air Quality Strategy objectives. These are detailed in REAC commitments AQ001 to AQ005 and include measures to prevent, reduce and suppress any dust emissions. Dust monitoring and inspection would be undertaken to ensure that the mitigation measures remain effective during the construction works; this is summarised in AQ006 to AQ008 of the REAC. Following adoption of these measures, there are expected to be no significant air quality effects as a result of construction dust and emissions from the construction plant. The change in traffic flow as a result of temporary traffic management measures, and the increase in construction vehicles over the five-year construction phase has been assessed. Dispersion modelling was undertaken and the results demonstrated that impacts on human health receptors are	

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Heading	Topic	The Applicant's Response	Link
		negligible and non-significant, and therefore no mitigation is required Modelling of operational phase road traffic impacts on air quality concluded that impacts on human health receptors are negligible and non-significant, and therefore no mitigation is required.	
	Impact of traffic flow – noise and vibration	Due to the scale of the Lower Thames Crossing, it is inevitable that noise and vibration will be created. National Highways has carried out detailed surveys and assessments on existing noise levels at many different locations near the construction site and operational road. Where National Highways has assessed that construction activities may exceed these levels it will implement suitable mitigation measures. These measures are detailed in REAC Commitments NV001 to NV017 and include using quieter plant and equipment, careful location of noisier activities away from sensitive areas, providing acoustic barriers, and providing appropriate housing for stationary noisy equipment. The Environmental Statement notes that it has been reasonably concluded that the significant adverse impacts on health and quality of life would be avoided through the implementation of the specific mitigation measures identified above and secured through the REAC commitments identified above.	
	Mitigation and funding	The Project has ensured that mitigation has been developed in order to reduce significant effects wherever practicable. This mitigation (in the form of Control Plans, CoCP/REAC, Design Principles and Requirements of the DCO itself) is legally secured via the draft DCO and therefore where funding is required this is	

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Heading	Topic	The Applicant's Response	Link
		considered secured. National Highways is discussing this further with NHS Kent and Medway Integrated Care Board to clarify their request.	

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2.34 North Kent Marshes Internal Drainage Board

Introduction

2.34.1 North Kent Marshes Internal Drainage Board (NKMIDB) is a prescribed consultee under s42(1)(a) of the Planning Act 2008. NKMIDB was notified under s42(1)(a) of the Planning Act 2008 of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.34.2 The Applicant and NKMIDB prepared a joint SoCG at the request of the Examining Authority in its Rule 6 letter of 25 April 2023 and submitted the first version of the joint SoCG at DL 1 in accordance with the Examining Authority's request.

2.34.3 The Applicant and NKMIDB were not engaged in the SoCG process at DCO Application. As an SoCG had not previously been developed by the Parties, the matters raised by the council in its RR have been used to form the basis of the New SoCG.

To avoid repetition, Table 4.29 outlines all matters raised in the RR and signposts to NKMIDB, where the Parties have begun to develop the Matters. Those Matters can be seen in full within the SoCG which has been submitted at DL 1 SoCG.

Overview of matters raised in North Kent Marshes Internal Drainage Board's RR

2.34.4 The Applicant has undertaken a detailed review of all matters raised in NKMIDB's RR.

2.34.5 The matters raised by NKMIDB in its RR have been used as a basis for the SoCG and the Applicant has responded in detail to these matters.

2.34.6 Table 2.54 provides the headings and topics for these matters and provides references within the SoCG.

Table 2.54 New Matters raised in RR, which are addressed in the SoCGs submitted at DL 1

Heading	Topic	Item No.	Link
DCO and consents	Environment	2.1.1	This SoCG was newly requested for DL 1 and so no link to an application version is available.
	Environment	2.1.2	
Road drainage and the water environment	Project design and mitigation	2.1.4	
	Project design and mitigation	2.1.5	
	Project design and mitigation	2.1.6	
	Project design and mitigation	2.1.7	

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2.35 Northumbrian Water operating as Essex and Suffolk Water

Introduction

2.35.1 Essex and Suffolk Water (ESW) is the appointed water undertaker for 1.8 million people in parts of Essex and Suffolk by virtue of an appointment under the Water Act 1989 (as amended) and therefore has statutory obligations as to public water supply. It has a number of assets, including strategically important water mains, within the proposed Order Limits of the Project. In addition, Northumbrian Water Limited is listed in the Book of Reference **[Additional Submission AS-042]** as the owner of plot 24-133. ESW is a prescribed consultee under s42(1)(a) of the Planning Act 2008 and was notified of pre-application statutory consultation and subsequent phases of non-statutory consultation.

2.35.2 The Applicant and ESW prepared an SoCG that was submitted as part of the DCO Application **[Application Document APP-107]**. Since DCO Application the SoCG has been under development and parties expect that an updated SoCG will be submitted at a later examination deadline.

2.35.3 The matters raised in the RR included some that are the same or fundamentally similar to those addressed within the SoCG submitted at DCO application., These Matters are presented in Table 2.55 below. However, there are some new matters that were not included in the SoCG, Table 2.56 sets out these issues and provides references within the SoCG.

Overview of matters raised in ESW's RR

Table 2.55 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Construction	Diversion of other ESW apparatus: Long lead items - *Due to the scale of these diversions, the importance of the apparatus and the current timescales for supply of materials and undertaking works, ESW is seeking additional protections for its undertaking through the provisions mentioned above*.	2.1.11	[**Application Document APP-107**].
Design – Road, Tunnels, Utilities	Linford borehole site	2.1.1 2.1.2	
Protective Provisions	Modified Protective Provisions	2.1.9 2.1.10	

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Table 2.56 New and existing Matters raised in RR, which are addressed in the SoCG submitted at a later deadline

Heading	Matter	The Applicant's response	Status
Design – Road, Tunnels, Utilities	*The aquifer for this well is unconfined with a high water table and, therefore, is at a higher risk of contamination causing a detrimental impact on water quality and, consequently, the output from the Linford Well. ESW has concerns that works carried out under the DCO powers in the source protection zone ("SPZ") for the Linford Well have the potential to contaminate its source. For this reason, ESW sought further information from the Applicant (a) in relation to a number of waterbodies which appear to be placed within SPZ1 and (b) on whether the Linford Well was identified as a potential receptor for mobilised land leachates. ESW is in the process of reviewing this information but currently ESW's concerns on these issues remain. ESW is seeking sufficient protections in relation to monitoring and mitigation of contamination through the side agreement mentioned above.*	The Applicant and ESW continue to engage regarding their concerns with the appropriate parts of the application being signposted for ESW consideration. Both parties are discussing a separate agreement to the satisfaction of ESW regarding all outstanding matters, including the management and monitoring of ESW's water source. The Applicant is confident the agreement will be concluded during the examination period and shall update the Examining Authority accordingly	Matter Under Discussion
DCO and Consents	*ESW is very concerned that the Linford Well (plot 24-133) is subject to compulsory acquisition powers when it had understood from engagement that this would not be the case. Under the DCO as applied for, the Applicant would have powers to temporarily occupy the Linford Well site as well as to permanently acquire rights etc. over it. ESW therefore has strong concerns over the Applicant seeking powers to acquire an essential and sensitive piece of apparatus and potential harms that may arise if it does. As ESW is negotiating arrangements by way of formal agreement to assist the Applicant in constructing the Scheme, such powers over the well are not necessary.*	The Applicant and ESW continue to engage regarding their concerns with the appropriate parts of the application being signposted for ESW consideration. Both parties are discussing a separate agreement to the satisfaction of ESW regarding all outstanding matters, including the management and monitoring of ESW's water source. The Applicant is confident the agreement will be concluded during the examination period and shall update the Examining Authority accordingly	Matter Under Discussion

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2.36 Port of London Authority

Introduction

2.36.1 The Port of London Authority (PLA) is a statutory harbour authority established by the Port of London Act 1908 to govern the Port of London. Its statutory powers and duties are mainly to be found in the Port of London Act 1968 (the 1968 Act). The PLA's responsibilities extend over the tidal River Thames and its tidal tributaries from the landward limits at Teddington to its tidal limits in the outer estuary. The PLA maintains and supervises navigation to ensure navigational safety along the tidal River Thames, sharing its marine, environmental, planning and other expertise to promote use of the river and safeguard its unique marine environment.

2.36.2 The PLA was notified under s42(1)(a) of the Planning Act 2008 of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.36.3 The Applicant and PLA prepared an SoCG **[Application Document APP-100]** that was submitted as part of the DCO application. Since DCO Application the SoCG has been under development and parties expect that an updated SoCG will be submitted at a later examination deadline.

2.36.4 Some of the Matters included in the PLA RR are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application. Those Matters are presented in Table 2.57, along with the applicable item number. New Matters raised in the PLA RR that were not included in the DCO Application SoCG are presented in Table 2.58.

2.36.5 In Table 2.58 the Applicant has included text taken directly from the PLA RR. Where the PLA has used reference numbers within their text this has remained, unaltered.

Overview of matters raised in the PLA's RR

Table 2.57 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Need for the Project	Project Objectives	2.2.26	[**Application Document APP-100**]
Land and Compulsory acquisition	Commitment to river use	2.1.39	
DCO and Consents	Interpretation of Article 18 DCO on powers in relation to relevant navigations or watercourses; Inclusion of conditions in the DCO for works in the River Thames	2.1.13 2.1.25	
DCO and Consents;	Depth of tunnel; Route alignment, tunnel depth	2.1.12, 2.1.34, 2.1.40	

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Heading	Topic	Item No.	Link
Land and Compulsory acquisition Construction	and tunnel protection zones; Scour Protection		
Consultation and engagement	Commitment to river use	2.1.39	
DCO and Consents	Interpretation of Article 8 DCO on transfer of powers	2.1.24	
DCO and Consents; Land and Compulsory acquisition	Interpretation of Article 8 DCO on transfer of powers	2.1.24 2.1.30	
Land and Compulsory acquisition	Compulsory Acquisition powers in favour of National Highways	2.1.31	
Land and Compulsory acquisition	Interpretation of Article 8 DCO on transfer of powers	2.1.30	
DCO and Consents;	Disapplication of explosives licence at Higham Bight anchorage	2.1.20	
DCO and Consents;	Ground investigations: licensing; Depth of tunnel	2.1.42, 2.1.12	
Protective Provisions	River Safety Lighting Management Plan	2.1.56	

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Table 2.58 New Matters raised in RR, which are addressed in the SoCG to be submitted at a subsequent deadlines

Heading	Matter	The Applicant's response	Status
Construction	7. Robust commitments and reporting procedures are needed: in the PLA's experience, neither commitments nor reporting by other projects have been sufficiently robust. Nor has the Applicant has not been able to provide data to the PLA concerning reporting procedures for other DCOs that it has promoted. In addition, the Applicant's air quality commitments and management plan appear to relate only to road vehicles, and should relate to river vessels.	The Applicant provided the PLA with DCO Application Documents in December 2020. The Applicant has refined and enhanced those application documents in the submitted DCO application. These documents detailed the approach, framework, methodology and assessments regarding environmental considerations (SoCG Item 2.1.43 [**Application Document APP-100**]). The Applicant is not clear precisely what the concerns of the PLA are in this context, and consider that the proposed controls, outline management plans, and mitigations are appropriate.	Matter Under Discussion
DCO and Consents	Inconsistencies and uncertainties in the Environmental Statement 16. The PLA has identified general inconsistencies and inaccuracies across the chapters of the Environmental Statement (doc ref 6.1) and with the register of environmental actions and commitments (doc ref 7.11).	The Applicant is not clear which precise and specific issues the PLA has but the Applicant has been working with the PLA since DCO submission on detailed issues. It is considered that issues identified by the PLA through engagement will be addressed through the Environmental Statement Addendum submitted at DL 1.	Matter Under Discussion
DCO and Consents	17. There is uncertainty in respect of the production and approval of a marine biodiversity security plan. The archaeological written scheme of investigation (doc ref 3.3 Appendix 6.9) does not specifically consider the River, nor any maritime archaeology therein, or require the PLA's approval. There is also confusion in the Application documents as to whether dredging is proposed in the Order scheme.	In relation to marine biodiversity, the Applicant notes Table 9.13 of Chapter 9 of the Environmental Statement [**Application Document APP-147**] which concludes no significant effects are likely. Nonetheless, the Applicant has proposed suitable controls and approvals (in the Deemed Marine Licence, which will be subject to the MMO's approval, as well as the Protective Provisions for the PLA). In addition, the REAC contained within the Code of Construction Practice includes measures related to marine biodiversity (see REAC Items, MB001 to MB003 [**Application Document APP-336**]). In relation to archaeology, the Applicant emphasises that	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		works above the river bed of the River Thames are limited, and it has provided a full assessment against cultural heritage in Chapter 6 of the Environmental Statement [**Application Document APP-144**]. The Applicant is engaging with the PLA to understand the PLA's specific concerns. Dredging is a matter under item 2.1.7 of the SoCG [**Application Document APP-100**] which the Applicant believes should be agreed.	

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2.37 Port of Tilbury London Limited

Introduction

2.37.1 Port of Tilbury London Limited (PoTLL) is the owner and operator of the Port of Tilbury which lies some 2km to the west of the proposed alignment of the Project route.

2.37.2 The Applicant and PoTLL prepared an SoCG **[Application Document APP-102]** that was submitted at DCO Application. At DL 1, the SoCG remains under development and parties expect that an updated SoCG will be submitted at a late deadline.

2.37.3 Many of the matters included in the PoTLL RR were the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application, these matters are set out in Table 2.59. Where a New Matter has been raised in the RR, it has been addressed in Table 2.60 The RR also contained new and existing Matters which have not been included within the SoCG and are being addressed through ongoing engagement with the Interested Party. These Matters are addressed in Table 2.61. In Table 2.60 the Applicant has included text taken directly from the PoTLL RR. Where the PoTLL has used reference numbers within their text this has remained, unaltered.

Overview of matters raised in PoTLL's RR

Table 2.59 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Traffic and economics	Construction phase impacts on the Asda Roundabout, M25 J30, A13, and A1089	2.1.15	[**Application Document APP-102**]
Land and Compulsory acquisition	Fort Road	2.1.2	
Traffic and economics; Land and Compulsory acquisition	Traffic assessment; Construction phase impacts on the Asda Roundabout, M25 J30, A13, and A1089; Management of Construction Traffic Parking outside of Port of Tilbury London Limited areas; Fort Road	2.1.14, 2.1.15, 2.1.24, 2.1.12	
Traffic and economics; Construction; Land and Compulsory acquisition;	Outline Materials Handling Plan and use of the Construction Materials and Aggregates Terminal facility (and Port of Tilbury London Limited facilities more generally).	2.1.11, 2.1.8, 2.1.1	

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Heading	Topic	Item No.	Link
DCO and Consents			
Traffic and economics; Wider network impacts	Construction phase impacts on the Asda Roundabout, M25 J30, A13, and A1089; Haul Road	2.1.15, 2.1.26	
Traffic and economics; Wider network impacts	Port of Tilbury 1 egress for abnormal indivisible load (AIL); Construction phase impacts on the Asda roundabout, M25 J30, A13, and A1089; Construction phase: Impacts of construction activities taking place on traffic flows; Orsett Cock junction; Free flow traffic conditions at A13/A1089 Interchange; Construction Traffic Impacts – Flows on Substation Road, including AILs both with and without Freeport traffic. Operational impacts of the Project – the SRN in and around Tilbury	2.1.23, 2.1.15, 2.1.16, 2.1.17, 2.1.19, 2.1.20, 2.1.27	
Traffic and economics	Management of Construction Traffic Parking outside of PoT areas.	2.1.24	
Traffic and economics	Operational impacts of the Project – the SRN in and around Tilbury	2.1.27	
Traffic and economics	Tilbury Link Road	2.1.25	
DCO and consents Land and Compulsory acquisition;	Permanently required land and overlapping requirements; Temporarily required land and overlapping requirements – General; Land associated with UKPN power connections at Substation Road; Commercial discussions - Part of Shed Marsh & Tilbury Power Station	2.1.6, 2.1.7, 2.1.9, 2.1.10	
DCO and consents Land and Compulsory acquisition	Inclusion of the infrastructure corridor and space for potential utilities works.	2.1.4	
Land and Compulsory acquisition; Protective Provisions	Temporarily required land and overlapping requirements - Construction Materials and Aggregates Terminal and associated land;	2.1.8 2.1.7, 2.1.10, 2.1.31	

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Heading	Topic	Item No.	Link
	Temporarily required land and overlapping requirements – General; Commercial discussions - Part of Shed Marsh & Tilbury Power Station; Legal Agreement		
Terrestrial biodiversity; Protective provisions; DCO and consents	Ecological mitigation; Protective provisions; Legal agreement; DCO – drafting, requirements and control plans	2.1.28, 2.1.29, 2.1.30, 2.1.31, 2.1.1	
Construction	Limits of deviation (tunnel depth)	2.1.13	
Traffic and economics Protective Provisions	Tilbury Link Road (TLR); Haul Road	2.1.25 2.1.26, 2.1.31	

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Table 2.60 New Matters raised in RR, which are addressed in the SoCGs to be submitted at a subsequent deadline

Heading	Matter	The Applicant's response	Status
Protective Provisions	10.1.2 how the earthworks for the LTC (particular those associated with Work Nos. 5 and CA3) will be carried out and left in situ (including strata and landform);	The Applicant has proposed an interface working group to resolve detailed design matters at the interfaces between the Project landscaping and the port's land. The Applicant continues to work with PoTLL on these issues and will update and communicate these changes through the SoCG.	Matter Under Discussion
Operations and Maintenance	10.1.4 construction and operational drainage and how they will be future proofed and interact with PoTLL's Freeport proposals; 10.1.5 the emergency evacuation procedures for the tunnel given the Northern Portal is located adjacent to the Freeport land; 10.1.6 the development of utility provisions and commitments to PoTLL's ability to deal with future requirements	The Project will be required to deliver under dDCO Schedule 2 Requirement 8 [**Application Document AS-038**] the details of the foul water and drainage system for approval by the SoS. These drainage plans will require the management of drainage within the Order Limits and any off-site discharges are appropriately controlled. In addition, the REAC requirement RDWE012 states: Drainage infrastructure and treatment systems would be maintained in accordance with the National Highways' DMRB GS 801 Asset Delivery Asset Inspection Requirements (Highways England, 2020g) and DMRB GM 701 Asset Delivery Asset Maintenance Requirements (ADAMr) (Highways England, 2020f), as applicable, to ensure they continue to operate to their design standard to safeguard surface and groundwater quality [**Application Document APP-336**] Emergency evacuation procedures for the tunnel, given the location is close to the PoTLL land, would not impact directly on the PoTLL because there are areas designated for	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		emergency evacuation muster points within the Order Limits as detailed in the Design Principle S9.24. The Applicant has worked and continues to work with Statutory Undertakers to forecast demands and allow the Statutory Undertaker to manage their network for the benefit of all users. In relation to utilities works, paragraph 129 of Schedule 14 to the dDCO provides that '*The undertaker must, before the carrying out of any specified work, supply to PoTLL proper and sufficient plans of that work for the reasonable approval of PoTLL and the specified work must not begin except in accordance with such plans as have been approved in writing by PoTLL*' In this context, 'specified works' includes the proposed utilities works over PoTTL's land.	
Traffic and economics	10.1.7 the design of the junctions and roads contained within Work No. 5 to account for future traffic flows (or 'future proofing' to do so)	Work No.5 constitutes the operational access. The Applicant has considered the potential for connections to be made in this area at a future date and subject to a separate consenting process. However, there has been no decision on the preferred route or the specification of any connection in this area and consequently, it is not appropriate to make provision for development which is not directly required for the Project.	Matter Under Discussion
Land and Compulsory acquisition	10.1.8 how land temporarily possessed by LTC will be 'handed back' to PoTLL to enable its use for Freeport purposes.	Article 35 of the draft DCO makes provision for handing back land which is subject to temporary possession. In particular, article 35(5) it sets out that "the undertaker must remove all temporary works and restore the land to the reasonable satisfaction of the owners of the land". The	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		provision also sets out that the land can be handed back without removing temporary works "remove any temporary works where this has been agreed with the owners of the land".	
Construction	Separately, PoTLL are also concerned about the impact of having a large construction project immediately adjacent to their current harbour limits, with a large number of workers passing through Tilbury2, which could cause a safety and security risk. PoTLL are concerned to note that there are no measures in relation to construction workers included in the application documentation (such as a code of conduct) and would expect this to be developed. PoTLL also note that the Tilbury2 area is subject to byelaws that have also not been considered by the Applicant.	The CoCP Section 2.5 [Application Document APP-336] includes controls regulating conduct of contractors. Specifically, contractors are required to sign up to and adhere to the Considerate Constructors Scheme. The CCS is a national scheme that promotes good practice on construction sites through its codes of considerate practice; these commit registered sites to be considerate and good neighbours, as well as being respectful, environmentally conscious, responsible and accountable. The Applicant has recognised that there are local byelaws applicable in the Tilbury 2 Area. A review was completed, and the Applicant made the decision not to apply a disapplication of these byelaws. As a consequence, they will apply to staff and any activities within the applicable area.	Matter Under Discussion

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Table 2.61 New and existing Matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Land and Compulsory acquisition	6.36 In light of the above concerns, PoTLL has undertaken a review of the Book of Reference and Land Plans to ascertain whether they accurately reflect the position in respect of PoTLL's proprietary interests and rights. 6.37 In Appendix 2, PoTLL has set out the changes it considers should be made to those documents to more accurately reflect the position.	The Applicant has updated the Book of Reference [**Additional Submission AS-042**] to take account of changes to PoTLL's proprietary rights and interests since the DCO application was submitted. Updates to the Book of Reference will be provided at DL 1.	Open
	PoTLL are in advanced negotiations with the Applicant in respect of LTC's proposed use of some of the Freeport land. The proposals cover the letting by PoTLL to the Applicant of four areas shown indicatively on the Leasing Arrangements Plan, all of which lie within the North Portal Construction Compound. 6.39 The key to the Leasing Arrangements Plan sets out the proposed use of each area to be permitted under the leases to LTC. In general, the fallback position in the DCO insufficiently protects the interests of PoTLL, with very limited provision for protective provisions in favour of PoTLL that would adequately protect PoTLL and their tenants, occupiers and users. 6.40 Once the lease negotiations between PoTLL and LTC are concluded, the Applicant will have no need for the DCO powers over the land concerned. PoTLL has proposed to the Applicant that a Land and Works Agreement is signed alongside the four leases, acknowledging that PoTLL will be protected against the use of any such DCO power which is granted to the Applicant. This agreement would operate in a manner similar to the protections applicable to other statutory undertakers, namely that the Applicant may not interfere with PoTLL's proprietary interests and rights other than by agreement. 6.41 Within these negotiations, the Applicant is currently not accepting the principle of a restriction being put in place for the use of its proposed land and works powers on the basis of legal agreements being completed, despite such a restriction being contained in Heads	The Applicant has entered into lease arrangements for the areas shown in the leasing arrangement plans. The Applicant does not agree to any prohibition on the use of its DCO powers.	Open

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Heading	Matter	The Applicant's response	Status
	of Terms agreed in late 2022. This is fundamentally unacceptable to PoTLL, who are willing to, and have, expended considerable resources into entering into such agreements notwithstanding the sterilisation of their future development opportunities during the construction of LTC. 6.42 Without such restrictions being put in place by legal agreement, and/or in the Protective Provisions, the Applicant would be able to ignore the terms of any legal agreements if it so wishes, without any control for PoTLL to ensure that a serious detriment is not caused to their undertaking. PoTLL therefore object to these powers in the strongest terms if the Applicant continues to maintain this position. 6.43 It is also noted that the Applicant potentially wishes to acquire a long term interest in approximately 4 acres (1.6 hectares) of PoTLL's landholding, shown on the Leasing Arrangements Plan. The relevant lease to be granted to the Applicant which includes the LTC Option Land, may include a right for the Applicant to acquire the LTC Option Land (at market value) at the end of the lease (unless by operation of a break clause) upon terms which do not interfere with future development of Port Land and the Freeport. The DCO must not interfere with the proper functioning of this option and must protect PoTLL from the improper exercise of compulsory acquisition powers by the Applicant over the LTC Option Land.		
	8. **POLICY COMPLIANCE** 8.1 Overall, PoTLL consider that the Planning Statement (Document 6.2) prepared by the Applicant is a comprehensive assessment of the Project against the relevant planning policy and legislative framework. 8.2 Section 104(2) of the PA 2008 states that in deciding an application, the SoS must have regard to: (a) any relevant NPSs; (b) any appropriate marine policy documents; (c) any Local Impact Report (LIR) submitted to the Secretary of State;	The Applicant acknowledges PoTLL's representation regarding policy compliance. The Applicant agrees the Ports NPS is a potentially important and relevant consideration. The Applicant's approach to this consideration is set out in Chapter 7 Section 7.2 of the Planning Statement [**Application Document APP-495**]. The Applicant will continue to engage and respond through existing dialogue.	Open

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Heading	Matter	The Applicant's response	Status
	(d) any matters prescribed in relation to development of the description to which the application relates; and (e) any other matters which the SoS thinks are both important and relevant to the SoS's decision. 8.3 PoTLL accept and agree that the key NPS against which this Project will be determined is currently the 2014 National Policy Statement for National Networks (NPSNN). Insofar as the Project also requires the diversion of an existing overhead powerline and existing gas pipelines, it is also agreed that the Energy NPSs (NPS EN-1, NPS EN-4 and NPS EN-5 and the 2021 draft revisions to these Energy NPSs) are relevant to the Project. 8.4 However, PoTLL consider that greater weight should also be attached to the National Policy Statement for Ports (NPSP) as an 'important and relevant consideration' under section 104(2)(d), given: 8.4.1 the importance of the LTC, once operational, to future accessibility, connectivity and operation of both the Port of Tilbury and DP World London Gateway; 8.4.2 potential construction impacts that could affect the operation of the Port of Tilbury during the construction process; 8.4.3 potential impacts in both land take and construction traffic movements that could undermine the delivery of the Freeport; and 8.4.4 marine aspects that may impact upon the current and future operations of the Port of Tilbury, DP World London Gateway and the Port of London overall. 8.5 The NPSP sets out the Government's support for the growth and development of the UK's port infrastructure. Section 3.3 of the NPS outlines Government policy for Ports. In summary, the Government seeks to: 8.5.1 encourage sustainable port development to cater for long term forecast growth in volumes of imports and exports by sea with a		

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Heading	Matter	The Applicant's response	Status
	competitive and efficient port industry capable of meeting the needs of importers and exporters cost effectively and in a timely manner, thus contributing to long term economic growth and prosperity; 8.5.2 allow judgments about when and where new developments might be proposed to be made on the basis of commercial factors by the port industry or port developers operating within a free market environment; and 8.5.3 ensure all proposed developments satisfy the relevant legal, environmental and social constraints and objectives, including those in the relevant European Directives and corresponding national regulations. 8.6 Paragraph 4.1.1 of the NPSP states that the Government's objectives for transport include '*to promote economic growth through improving networks and links for passengers and* *freight, as well as ensuring an efficient and competitive transport sector both nationally and* *internationally'*. 8.7 It is PoTLL's contention that compliance with the NPSP, as an 'important and relevant' consideration, will only be achieved if: 8.7.1 the LTC DCO requires the maximum use of the Port of Tilbury (and in particular Tilbury2) during construction to minimise both the environmental effects of the project and the extent of construction traffic impacts on the SRN and the Infrastructure Corridor that routes construction traffic through Tilbury2; 8.7.2 all construction traffic effects on the SRN (in particular the ASDA roundabout) are fully assessed and mitigated such that the operation of the Port of Tilbury is not undermined by congestion and journey time increases caused by LTC construction traffic; 8.7.3 once LTC is operational, the long term accessibility to and connectivity of the Port is maximised, including ensuring that works are		

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Heading	Matter	The Applicant's response	Status
	left in situ that facilitate the construction and operation of the TLR in the future; 8.7.4 the extent of land take within the Freeport boundaries is minimised; 8.7.5 sufficient legally enforceable controls are given to PoTLL in respect of the utilisation of LTC DCO powers on their undertaking (both terrestrial and marine) to ensure that those impacts can be managed effectively; and 8.7.6 the restrictions in the DCO in relation to dredging in the river Thames do not prevent future dredging of the river to facilitate current and future vessel sizes. 8.8 For the reasons set out elsewhere in these representations, PoTLL consider that as presently presented, the scheme does not comply with the NPSP. This should cause concern to the Applicant in light of the decision not to make the Thanet Extension Offshore Wind Farm DCO for much the same reason. 8.9 PoTLL note the recital of local authority planning policy within Appendix C of the Planning Statement (Document 7.2) which includes reference (at page 98) to a 'shortened' version of Policy CSTP28: River Thames in the Thurrock Core Strategy and Policies for the Management of Development DPD (2015). This omits reference to Part I, sub paras (i) - (iii) of the policy. As highlighted above, these sub-paragraphs are material to the protection and promotion of land for port-related uses adjoining the river. They indicate that the Council will give priority to allocating riverside development to uses that require access to the river, safeguard port-related operational land and safeguard additional adjacent land required for further port development. PoTLL consider that it is important that LTC is assessed against Policy CSTP28 in its entirety, insofar as it must be demonstrated that it does not prejudice the delivery of port-related expansion in accordance with this policy.		

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Heading	Matter	The Applicant's response	Status
	8.10 Insofar as LTC has been modified through design development to reduce land take on the river frontage (by the removal/relocation of the previous Tilbury Fields proposal), PoTLL consider that the project design has sought to comply with this policy. The management of the construction process, including the land take and uses within the Northern Tunnel compound, should also be considered against the Council's objectives in Part I of Policy CSTP28. As currently presented, PoTLL consider that the Applicant cannot claim policy compliance in this regard. 8.11 Finally, PoTLL note that the LTC is being brought forward pursuant to 'Road Investment Strategy 2'. This Strategy includes within it a Performance Specification which the Government expects National Highways to meet, and which under section 3(6) of the Infrastructure Act 2015 it is statutorily required to meet. This Strategy includes a performance indicator of delays that are caused on 'gateway routes' to ports and airports. In PoTLL's view, absent proper mitigation being put in place for the construction phase, the LTC has the potential to cause significant delays to the gateway route to the Port of Tilbury. As such, the Applicant is in danger of bringing forward a project which will fail its own performance indicators.		
	9.5 PoTLL also note their concerns in respect of article 18 of the LTC Scheme draft DCO, which provides the Applicant with the ability to (without geographic restriction or reasonable justification) interfere with river navigation and with a range of physical assets that would capture assets owned by PoTLL (such as moorings and river walls) without the need for consent from relevant interested parties. 9.6 This is fundamentally unacceptable to PoTLL, as it gives the Applicant carte blanche powers to interfere with the workings of an operational port. As such, these powers must be made subject to the	The Applicant understands PoTLL's position and is currently reviewing Article 18.	Open

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Heading	Matter	The Applicant's response	Status
	absolute approval of PoTLL in respect of their assets and navigation within their statutory harbour authority boundary.		
	15.1 This Relevant Representation has set out a number of concerns with the LTC and the assessments and mitigation measures set out in the Application documentation. Taken together, these concerns mean that PoTLL consider that the LTC does not, in its current form, meet its own scheme objectives and imposes unacceptable impacts upon PoTLL's current and future operations. 15.2 As such, whilst PoTLL support the LTC in principle, further discussions are required with National Highways to ensure that PoTLL's concerns are fully dealt with – without them PoTLL must object to the DCO application and to the Scheme through this Relevant Representation, and will continue to do so until the issues that they have raised have been resolved. For the avoidance of doubt, this representation should be considered by the Examining Authority to be an objection made by PoTLL under section 127 of PA 2008. 15.3 PoTLL's concerns and proposals for resolving them are summarised in the first iteration of the Principal Areas of Disagreement Summary Statement set out in the first section of this Relevant Representation, and PoTLL look forward to working constructively with the Applicant to enable each of these areas to be resolved.	The Applicant acknowledges PoTLL's in principle support for the Project. The Applicant has been in close dialogue with PoTLL regarding the RR, SoCG and the Principal Areas of Disagreement. The Applicant notes, in addition to the above, the Principal Areas of Disagreement has been used as the basis for specific discussions and meetings to progress the issues expressed. This work is ongoing and will assist in updating the SoCG.	Open

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2.38 Royal Mail Group Limited

Introduction

2.38.1 The Applicant and Royal Mail Group Limited (Royal Mail) prepared an SoCG that was submitted as part of the DCO Application [**Application Document APP-114**]. Royal Mail is a prescribed consultee under s42(1)(a) of the Planning Act 2008 and was notified of the statutory pre-application consultation and subsequent phases of non-statutory consultation.

Overview of matters raised in Royal Mail's RR

2.38.2 The Applicant has undertaken a detailed review of all matters raised in Royal Mail's RR. The matters included some that were addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them. Table 2.62 sets out those issues and provides references within that SoCG.

2.38.3 There are no new matters and all matters in the SoCG remain agreed and so an updated version has not been submitted at Deadline 1.

Table 2.62 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
DCO and Consents	Advance consultation on works affecting the highways network	2.1.1	[**Application Document APP-114**]
	Consultation on the content of the final Traffic Management Plan for Construction	2.1.2	
	Mechanism to inform major road users	2.1.3	

2.38.4 The RR contained no new matters that needed to be addressed within the SoCG.

2.38.5 The RR contained some matters that are not fundamental to the Project, and therefore not suitable for inclusion in the SoCG. Table 2.63 summarises those issues and provides the Applicant's response.

Table 2.63 New and Existing Matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
DCO and Consents	*Royal Mail is registering be an Interested Party in order to protect its position and ability to submit written representations (if necessary) to seek to ensure that the above referenced wording remains unchanged during the Examination and will fully take effect during the construction phase.*	As an Interested Party, Royal Mail should expect to receive notifications about any changes to the documents. The Applicant will continue to engage with Royal Mail to also identify any changes in the DCO relevant to them.	Closed

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2.39 Sevenoaks District Council

Introduction

2.39.1 Sevenoaks District Council is a neighbouring authority in respect of the application and as such is a category 'A' local authority under section 43 of the Planning Act 2008. It was notified under s42(1)(b) of the Planning Act of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.39.2 The Applicant and Sevenoaks District Council prepared a joint SoCG at the request of the Planning Inspectorate in its Rule 6 letter of 25 April 2023 and submitted the first version of the joint SoCG at DL 1, in accordance with the Examining Authority's request.

2.39.3 The Applicant and Sevenoaks District Council were not engaged in the SoCG process at DCO Application. As an SoCG had not previously been developed by the Parties, the matters raised by the council in its RR have been used to form the basis of the New SoCG.

2.39.4 To avoid repetition, Table 2.64 outlines all matters raised in the RR and signposts to Sevenoaks District Council SoCG, where the Parties have begun to develop the Matters. Those Matters can be seen in full within the SoCG which has been submitted at DL 1 SoCG.

Overview of matters raised in Sevenoaks District Council's RR

Table 2.64 Matters raised in RR, which are addressed in the SoCG submitted at DL 1

Heading	Topic	Item No.	Link
Need for the Project	Benefits of the Project	2.1.1	This SoCG was newly requested for DL 1 and so no link to an application version is available.
Planning statement/policy	Planning Process	2.1.2	
Traffic and economics	Modelling WNI	2.1.4	
	Construction traffic	2.1.5	
Wider Network Impacts	Local WNI concerns	2.1.6	
	Local WNI concerns	2.1.7	
Air quality	Monitoring	2.1.8	
Cultural heritage	Assessment of likely significant effects	2.1.9	

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2.40 Shorne Parish Council

Introduction

2.40.1 Shorne Parish Council is a local authority constituted under the Local Government Acts. The parish is located to the east of Gravesend, in the Borough of Gravesham in the north-west of the county of Kent and is therefore in the western part of the Thames Gateway and Thames Estuary. The majority of the Project south of the River Thames that has visible/above-ground structures lies within Shorne parish. Shorne Parish Council is a prescribed consultee for the Project under s42(1)(a) of the Planning Act 2008 and was notified of pre-application statutory consultation and all phases of non-statutory consultation.

2.40.2 The Applicant and Shorne Parish Council prepared an SoCG that was submitted as part of the DCO Application **[Application Document APP-135]**. Since DCO Applications the Parties have continued to collaborate in the Matters within and at DL 1, the SoCG remains under development. Parties expect that an updated SoCG will be submitted at a later examination deadline.

2.40.3 All of the issues raised in Shorne Parish Council's RR are represented within the SoCG.

Overview of matters raised in Shorne Parish Council's RR

2.40.4 The matters included are mostly the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them. Table 2.65 sets out those issues and provides references within that SoCG.

Table 2.65 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Land and Compulsory acquisition	Impacts	2.1.21	[**Application Document APP-135**]
Need for the Project	Project objectives	2.1.1, 2.1.2, 2.1.5	
Need for the Project	Cost of the Project	2.1.3	
Route selection, modal alternatives & assessment of reasonable alternatives	Route selection	2.1.7, 2.1.8, 2.1.9, 2.1.18	
Consultation and Engagement	Adequacy of consultation	2.1.10, 2.1.13	
	Consultation	2.1.17	
	Consultation information	2.1.12, 2.1.14	
Traffic and economics	Modelling methodology	2.1.55, 2.1.59	
	Developments and uncertainty log	2.1.56	

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Heading	Topic	Item No.	Link
Design, Road, Tunnels, Utilities	Design	2.1.30	
	Mitigation	2.1.36	
Wider Network Impacts	Local WNI concerns	2.1.62	
Construction	Worker transport	2.1.41	
Marine biodiversity	Impacts	2.1.91	
Road drainage and the water environment	Project design and mitigation	2.1.101	
Air quality	Assessment of likely significant effects	2.1.77	
	Assessment methodology	2.1.79	

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2.41 Southern Gas Networks

Introduction

2.41.1 Southern Gas Networks (SGN) is a UK gas distribution company which manages the networks that distribute natural and green gas to homes and businesses across the South of England and Scotland. SGN owns and operates infrastructure that would be affected by the Project SGN is a prescribed consultee under s42(1)(a) of the Planning Act 2008 and was notified of the statutory pre-application consultation and subsequent phases of non-statutory consultation.

2.41.2 The Applicant and SGN prepared an SoCG that was submitted as part of the DCO Application [**Application Document APP-115**].

2.41.3 Most of the issues raised in the SGN's RR are represented within the SoCG.

Overview of matters raised in SGN's RR

2.41.4 The Applicant has undertaken a detailed review of all matters raised in SGN's RR. The matters all the same or fundamentally similar as those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them. Table 2.66 sets out those issues and provides references within that SoCG.

Table 2.66 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Protective Provisions	Protective Provisions	2.1.2 2.1.3	[**Application Document APP-115**]

2.41.5 There were no new matters raised in the RR.

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2.42 Southern Water Services Limited

Introduction

2.42.1 Southern Water Services Limited (SWS) is the appointed water undertaker under the Water Industry Act 1991 for certain areas in the south-east of England comprising the Isle of Wight and parts of Hampshire, Sussex and Kent. SWS is also the appointed sewerage undertaker for the purposes of that same Act, comprising a larger continuous area stretching from Hampshire to Kent, including the Isle of Wight. SWS is a prescribed consultee under s42(1)(a) of the Planning Act 2008 and was notified of the statutory pre-application consultation and subsequent phases of non-statutory consultation.

2.42.2 In 2022, the Applicant and SWS prepared a SoCG. However, that was not submitted as part of the DCO by mutual agreement. The Applicant and SWS have since engaged further on the development of the SoCG and have submitted it as an Agreed draft at DL 1.

Overview of matters raised in SWS' RR

2.42.3 The Applicant has undertaken a detailed review of all matters raised in the SWS' RR and they were all fundamentally the same or similar as those in the SoCG. Table 2.67 sets out those issues and provides the Applicant's position on them.

Table 2.67 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Matter	The Applicant's response	Status
Modified Protective Provisions	*SWS notes the 'standard' set of protective provisions for the benefit of statutory undertakers contained in Part 1 of Schedule 14 to the draft DCO. However, SWS considers these to fall short of providing it with the necessary protections.*	The parties are currently in advanced discussions to resolve SWS' concerns. It is anticipated that these discussions will result in a solution that is acceptable to SWS during the course of the examination.	Matter Under Discussion
Works within SWS' abstraction zones	*Should the DCO be made, it would authorise works within certain of SWS's groundwater abstraction capture zones – further information is required from National Highways.*	The Applicant has provided SWS with the requested information. Discussions are currently ongoing between the parties to address any concerns that SWS may have.	Matter Under Discussion
Dewatering activities and tunnel boring risk	*SWS requires further information on dewatering activities and tunnel boring risk (and any proposed mitigations)*	The Applicant has provided SWS with the requested information. Discussions are currently ongoing between the parties to address any concerns that SWS may have.	Matter Under Discussion

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2.43 Swale Borough Council

Introduction

2.43.1 Swale Borough Council is provided for under s.43(2) of the Planning Act 2008, as part of the boundary of the authority's area is also part of the boundary of a local authority within s.43(1) that is a 'unitary authority' for the purposes of s.43(3) in respect of the application and as such is a category 'A' local authority under section 43 of the Planning Act 2008. Swale was notified under s42(1)(b) of the Planning Act of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.43.2 The Applicant and Swale Borough Council did not prepare a joint SoCG at DCO submission stage in October 2022.

2.43.3 The Applicant and Swale Borough Council prepared a joint SoCG at the request of the Planning Inspectorate in its Rule 6 letter of 25 April 2023 and submitted the first version of the joint SoCG at DL 1 in accordance with the Examining Authority's request.

2.43.4 To avoid repetition, Table 2.64 outlines all matters raised in the RR and signposts to Sevenoaks District Council SoCG, where the Parties have begun to develop the Matters. Those Matters can be seen in full within the SoCG which has been submitted at DL 1 SoCG.

Overview of matters raised in Swale Borough Council's RR

2.43.5 The Applicant has undertaken a detailed review of all matters raised in Swale Borough Council's RR. As an SoCG was not previously produced between Swale Borough Council and the Applicant, the matters raised by Swale Borough Council in its RR have been used to articulate its position in the SoCG and the Applicant has responded to these matters.

2.43.6 Table 2.68 provides the headings and topics for these matters and provides references within the SoCG.

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Table 2.68 Matters raised in RR, which are addressed in the SoCG submitted at DL 1

Heading	Topic	Item No.	Link
Need for the Project	Need for the Project	2.1.1	This SoCG was newly requested for DL 1 and so no link to an application version is available.
Planning statement/policy	Economic concerns Environmental concerns	2.1.2	
Route selection, modal alternatives & assessment of reasonable alternatives	Modal shift	2.1.3	
Operation and Maintenance	Safety	2.1.4	
Socio-economics	Traffic Effects on Business / Local Economy	2.1.5	
Wider Network Impacts	Local WNI concerns	2.1.6	
	Non-Project highway improvements	2.1.7	
	WNI Approach	2.1.8	
Environmental Impact Assessment methodology	Assessment	2.1.9	
Air quality	Impact	2.1.10	

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2.44 Thames Chase Trust

Introduction

2.44.1 Thames Chase Trust was established in 1990 to improve landscapes in East London and South Essex. It is one of the twelve Community Forests set up across England to regenerate and enhance the natural environment. Formally managed and funded by a Joint Committee of the four local authorities in which Thames Chase Trust is situated and Essex County Council, Thames Chase Trust Community Forest is now managed by the Thames Chase Trust and funded by small grants from these authorities and large grants from national and charitable organisations.

2.44.2 The Applicant and Thames Chase Trust prepared an SoCG that was submitted as part of the DCO Application **[Application Document APP-136]**.

Overview of matters raised in Thames Chase Trust's RR

2.44.3 The Applicant has undertaken a detailed review of all matters raised in Thames Chase Trust's RR. Table 2.69 sets out the issues raised and provides a reference within the SoCG.

Table 2.69 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Land and Compulsory acquisition	Impacts	2.1.7	[**Application Document APP-136**]

2.44.4 There were no new matters raised in the RR.

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2.45 Thames Water

Introduction

2.45.1 Thames Water Utilities Limited (Thames Water) is a water and wastewater company serving over 15 million people. The Project would affect a single sewer pipe operated by Thames Water in the northern part of the new A122 near the M25 junction 29. Thames Water is a prescribed consultee under s42(1)(a) of the Planning Act 2008 and was notified of the statutory pre-application consultation and subsequent phases of non-statutory consultation.

2.45.2 In 2022, the Applicant and Thames Water prepared a SoCG. However, that was not submitted as part of the DCO Application by mutual agreement, however following further engagement an SoCG was submitted at DL 1.

Overview of matters raised in Thames Water's RR

2.45.3 The Applicant has undertaken a detailed review of the matters raised in Thames Water's RR. The Applicant agrees with Thames Water's position that those matters have now all been resolved between them and the SoCG will set out those matters in detail.

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2.46 Thurrock Council

Introduction

2.46.1 Thurrock Council is a host authority in respect of the application and as such is a category 'B' local authority under section 43 of the Planning Act 2008. Under s42(1)(b) of the Planning Act 2008, Thurrock Council was notified of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.46.2 The Applicant and Thurrock Council prepared an SoCG that was submitted as part of the DCO Application **[Application** Document **APP-130**].

2.46.3 The Applicant has worked closely with Thurrock Council in the preparation of a updated SoCG however, the Council has not yet been able to complete its review of the SoCG in line with its governance process therefore an updated SoCG has not been submitted at Deadline 1. The Council have indicated that due to other examination commitments they wish to target Deadline 3 for the next SoCG update and the Applicant has confirmed it will work with them to achieve this.

2.46.4 Most of the issues raised in Thurrock Council's RR are represented within the draft SoCG in development. These are presented in the Table 2.70. There are some new matters not included in the SoCG and these are also presented below.

Overview of matters raised in Thurrock Council's RR

2.46.5 The Applicant has undertaken a detailed review of all matters raised in the council's RR. The matters included some that are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them. The following table sets out those issues and provides references within that SoCG.

Table 2.70 Matters raised prior to the RR Period and acknowledged within an SoCG

Heading	Topic	Item No.	Link
Traffic and Economics	Combined Modelling and Appraisal Report (ComMA)	2.1.155 2.1.156, 2.1.169	[**Application Document APP-130**]
	Modelling output interpretations	2.1.57, 2.1.157, 2.1.169	
Wider Network Impacts	Local Modelling Requests WNI Approach Modelling WNI Local WNI concerns Monitoring Approach	2.1.143, 2.1.146 – 2.1.150, 2.1.153, 2.1.158 – 2.1.164	
Design – Road, Tunnels, Utilities	Bridges and Structures Junctions	2.1.84, 2.1.91, 2.1.285,	

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Heading	Topic	Item No.	Link
	Trunking/Design	2.1.98, 2.1.99, 2.1.102, 2.1.256, 2.1.257	
Construction	Impacts Construction Traffic Impacts Worker Travel HEQIA assessment Mitigation Closures and Diversions Road alteration and maintenance Logistics, materials, and operations Responses	2.1.75 2.1.107 – 2.1.109, 2.1.110, 2.1.111, 2.1.117 – 2.1.122, 2.1.127, 2.1.128, 2.1.130 – 2.1.133 2.1.138, 2.1.140, 2.1.236, 2.1.243 – 2.1.255	
Traffic and Economics Route selection, modal alternatives & assessment of reasonable alternatives	Modelling Methodology Public Transport Design alternatives Route selection Design alternatives Modal alternatives	2.1.243, 2.1.63, 2.1.66 – 2.1.70	
Climate and Carbon	Legislative and Policy Frameworks Project Design and Mitigation	2.1.264 – 2.1.270	
Health and Equalities Impact Assessment (HEQIA)	Environment Consultation Information Combined Modelling and Appraisal Report (ComMA) Assessment methodology Assessment of likely significant effects Project design and mitigation Monitoring HEqIA CIPHAG Independent Recommendations HEqIA Assessment	2.1.28, 2.1.77, 2.1.155, 2.1.187 – 2.1.190, 2.1.193 – 2.1.198, 2.1.206 – 2.1.232, 2.1.239 – 2.1.240	
Planning Statement/ Policy	Infrastructure strategy Traffic Public Transport Design alternatives	2.1.58, 2.1.62, 2.1.63, 2.1.66, 2.1.69,	

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Heading	Topic	Item No.	Link
Route Selection, Modal Alternatives & Assessment of Reasonable Alternatives Consultation and Engagement Design – Road, Tunnels, Utilities Traffic and Economics Wider Networks Impacts Socio-Economics Legacy items beyond the scope of the Project	Modal alternatives Junctions Design Local plan growth Modelling WNI Local WNI concerns Non-LTC Highway improvements Assessment Bridges & Structures Bus access Passive Provision Road Upgrade	2.1.70, 2.1.85, 2.1.89, 2.1.98, 2.1.99, 2.1.146, 2.1.153, 2.1.159, 2.1.165, 2.1.169, 2.1.256, 2.1.257, 2.1.277, 2.1.278, 2.1.279	
Operations and Maintenance	Emergency Services	2.1.141	
Consultation and Engagement	Consultation information Responses SEE Strategy and Supply Chain Community Resource Initiatives/ Effect on businesses Social Value Community Fund	2.1.71-2.1.75, 2.1.77, 2.1.170 – 2.1.175, 2.1.177 – 2.1.184	
Land and Compulsory Acquisition	Compensation Land acquisition Open Space and common land Public Open Space / Access to Recreation	2.1.80, 2.1.81, 2.1.83, 2.1.238	
DCO and Consents	Environment Consent Process Planning Responsibility Land rights Rights of way Consultation	2.1.3, 2.1.5, 2.1.6, 2.1.7, 2.1.13, 2.1.14, 2.1.46, 2.1.54, 2.1.124,	

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Heading	Topic	Item No.	Link
	Human remains Traffic Management Planning Compensation Consultation	2.1.125, 2.1.127	
Need for the Project Design – Road, Tunnels, Utilities Socio- Economics Material Assets and Waste Population and Human Health Road Drainage and Water Environment Climate and Carbon Legacy Items Beyond the DCO	Lack of secured local benefits Utilities Design SEE Strategy and Supply Chain Community Resource Initiatives Effect on businesses social value Communication and Community engagement Community Fund Project design and mitigation Worker Transport/ WCH/ Active Travel – Construction Effects Bridges & Structures Smart speed limits LTC tolls Passive Provision Road Upgrade Enhancement Restoration Vehicle usage targets Trunking	2.1.57, 2.1.105, 2.1.106, 2.1.170-2.1.184, 2.1.203, 2.1.204, 2.1.245 – 2.1.258, 2.1.260 – 2.1.262, 2.1.269, 2.1.275-2.1.285	
Other Concerns	Other concerns not covered by topics above: Impacts on public transport Maintenance of the PRoW infrastructure Wider Socio-Economic impacts Need for a Scoping Opinion and Transport Chapter in ES Designation of a Scheduled Monument and primacy of NPSNN over DMRB Impact on the Landscape Character Commitment to Biodiversity Net Gain (BNG) and other Specific Queries Construction waste elimination and mitigation	2.1.133, 2.1.142, 2.1.169, 2.1.185 – 2.1.186, 2.1.191 – 2.1.192, 2.1.199 – 2.1.202, 2.1.205, 2.1.238, 2.1.241 – 2.1.242, 2.1.263 and 2.1.272 – 2.1.274.	

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Heading	Topic	Item No.	Link
	Comments on draft oSWMP Impact of possession of common land and private recreational facilities Completion and improvement of PRoW network within and outside Order Limits Potential legacy improvement in Baker Street Future responsibilities of sea defences at Coalhouse Point Nitrogen Deposition – assessment, methodology and DCO Requirement Work on flood defences		

2.46.6 The RR contained new matters not addressed within the draft SoCG submitted with the DCO application. Table 2.71 summarises those issues and provides the Applicant's response.

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Table 2.71 New Matters raised in RR, which are to be addressed in the SoCG to be submitted at a subsequent deadline

Heading	Matter	The Applicant's response	Status
Traffic and Economics	*LTAM is in need of rebasing to reflect the delay to the scheme, which was the subject of the Ministerial Statement [**PD-011**]. It is now known that the scheme will be delivered at the earliest by 2032, (rather than the previously assumed opening year of 2030), some 16 years after the current baseline data. This is clearly not in line with DfT guidance about the use of data. (para. 20)* *There is therefore significant uncertainty about the validity of the forecasts, and the implications of this are exacerbated now that scheme opening is two years into the 5 year flexibility window proposed by NH in the draft DCO. (para. 22)*	This issue will be added as a new matter to the Thurrock Council Statement of Common Ground under Item No. 2.1.289 (DL 1) in the 'Traffic and Economics' section. The Lower Thames Crossing DCO application has been developed in line with standard practice. The draft DCO [**Additional Submission AS-038**] sets a time limit on the start of works (article 2) of no later than five years after the date the DCO comes into force. A two-year rephasing sits within this five-year time limit.	Matter Under Discussion
	Due to Council concerns about future junction performance, the Council and NH undertook a local VISSIM model of the LTC/A13/Orsett Cock Roundabout/A1089 interchange junction in 2021. It is understood that these modelling results are not part of the DCO application at present but do need to be included in the ExA's considerations. (para. 29) *The Council is very concerned that NH has submitted the DCO application when it is clear that the NH/Council joint modelling shows that LTC scheme does not work. (para. 30(i))*	This issue will be added as a new matter to the Thurrock Council Statement of Common Ground under Item No. 2.1.290 (D L1) in the 'Traffic and Economics' section. The Applicant and Thurrock Council undertook a joint collaborative exercise to produce a microsimulation model of the A13 Orsett Cock junction. The scenarios and flows were agreed with the council as part of this process. This approach means that both parties are aware of what was to be included within the model and its purpose. The Applicant is satisfied that the microsimulation modelling results did not show that the junction and therefore the	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		Project does not work or have unacceptable impacts. The Applicant has identified both the adverse and beneficial impacts on traffic flows across the road network from the Project's strategic transport model, and this assessment has been set out in Section 7.6 of the Transport Assessment [**Application Document APP-529**]. Each of these impacts has been assessed and considered against policy requirements as set out in Appendix F of the Transport Assessment [**Application Document APP-535**].	
	Manorway Junction – In May 2022 both the Council and DP World / London Gateway (DPWLG) sent a joint technical note to NH expressing concerns about the effect of LTC on the performance of Manorway Junction. This set out that NH must collaborate with the Council, DPWLG and other parties with interest in managing future growth/impact on the junction, to identify a scheme, determine proportionate funding contributions and mechanisms to ensure that the traffic generated by LTC does not contribute to conditions which inhibit port access. (para 39 b)	This issue will be added as a new matter to the Thurrock Council Statement of Common Ground under Item No. 2.1.291 (DL 1) in the 'Traffic and Economics' section. The Applicant has been working closely with the authority and DP World London Gateway (DPWLG) to develop a microsimulation model of the A13 Manorway junction. The outputs from this assessment have been shared with both Thurrock Council and DPWLG and address both beneficial and adverse impacts across the network, including at the junctions referred to, and are presented in Section 7.6 of the Transport Assessment [**Application Document APP-529**] and in Appendix F of the Transport Assessment [**Application Document APP-535**]. Overall, the benefits on the road network outweigh the adverse impacts, and this is	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		reflected in the positive economic benefit of the project within Thurrock. Specifically in relation to DP World London Gateway, Section 8.2 of Combined Modelling and Appraisal Report - Appendix C - Transport Forecasting Package [**Application Document APP-522**] provides journey time analysis for 2030 for a number of routes, including to and from DP World London Gateway. Within Section 3.3 of the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**], the Applicant sets out the work that has been undertaken with local highway authorities to consider the localised capacity or congestion issues.	
Climate and Carbon	*It is clear to the Council that there are no deliverable scenarios that deliver net zero transport without necessary reduction in vehicle kilometres (vkms) being required to meet the Climate Change Committee, NH's Net Zero Strategy or the Government's Transport Decarbonisation Plan carbon reduction trajectories of 15% - 40% by 2030, depending on assumptions. The Council contends that the current scheme and its various assessments are not in compliance with national policy, guidance and legislation and as such undermine LTC's strategic case. (para. 60)*	This issue will be added as a new matter to the Thurrock Council Statement of Common Ground under Item No. 2.1.292 (DL 1) in the 'Climate and carbon' section. The DfT's Transport Decarbonisation Plan (DfT, 2021) sets out how the transport sector will support the UK's transition to net zero in line with the Net Zero Strategy and Climate Change Act. It includes investment in active travel but also acknowledges the importance of continued investment in the UK's strategic road network, and the reduction of congestion which contributes to carbon emissions. The Applicant demonstrates the Project's compliance with relevant national policy, legislation and guidance in ES Appendix 15.1	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		- Climate Legislation and Policy [**Application Document APP-480**] and Planning Statement Appendix I Carbon Strategy and Policy Alignment [**Application Document APP-504**].	
Construction	*Define the procedures and governance that would accompany the adopted strategy, including the involvement of the PLA and the Council; an appropriate forum comprising Thurrock Council and Port of London Authority (PLA) to oversee the delivery of the commitment and discuss operational exemptions, safety improvements, and sustainability improvements.(para 47a)*	This issue is linked to the existing Thurrock Council Statement of Common Ground matter (Item No. 2.1.110) regarding the 'Use of Port Facilities to transport construction materials' in the 'Construction' section. This issue will be added to 2.1.110. Paragraph 3.1.1 of the outline Materials Handling Plan (oMHP), [**Application Document APP-338**], states that '*no part of the authorised development is to start until an Environmental Management Plan (Second Iteration)…has been submitted to and approved in writing by the Secretary of State, following consultation with the stakeholders identified in Table 2.1 of the CoCP.*'. Both Thurrock Council and Port of London Authority (PLA) are named bodies within Table 2.1 of the Code of Construction Practice (CoCP), [**Application Document APP-336**]. Technical discussions with Thurrock Council are ongoing and the Project is working with the council to provide further clarification and detail to address their concerns.	Matter Under Discussion
Planning statement / policy	*The Council contends that the requirements within the National Policy Statement (NPS) for the economic case prepared for the 'transport business case' are not provided accurately within the DCO*	This issue is linked to the existing Thurrock Council Statement of Common Ground matter (Item No. 2.1.58) regarding 'Accordance with National and Strategic Policy' in the 'Planning	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	application, as required within Section 4.5 of the NPSNN. (para 10).	statement/policy section. This issue will be added to 2.1.58. Section 4.2 of the Need for the Project [**Application Document APP-494**] describes the transport need for the Project. Section 3.2 describes how the Project accords with the NPSNN. The Applicant has developed a business case for the Project that aligns with the Government's appraisal requirements set out in HM Treasury's (2018) Green Book, as well as the DfT Business Case guidance and Transport Analysis Guidance (TAG). The Project's Outline Business Case, prepared in 2020, was released on 26 October 2022. The Combined Modelling and Appraisal Report (ComMA) [**Application Document APP-518**] provides an updated version of the Project's economic appraisal.	
Traffic and Economics / Need for the Project	*Benefit Cost ratio has been reducing and is currently set at between 1.09 – 1.36, depending on the growth scenario used – this is categorised by DfT as a 'low' value for money category. Clearly, by updating the costs, the OBC and recognising the disbenefits more clearly and the lack of the scheme achieving its objectives, is likely to cause this BCR to reduce further. (para 16)*	This issue is linked to the existing Thurrock Council Statement of Common Ground matter (Item No. 2.1.156) regarding 'value for money' in the 'Traffic and Economics' section. This issue will be added to 2.1.156. The Project's BCR has been updated at each stage to reflect both the modelling outcomes and government guidance at that stage. While the BCR has changed over time, as the changes have reflected changing government guidance, individual BCRs cannot be compared on a like-by-like basis, and it is not appropriate to extrapolate trends.	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
Traffic and Economics	*The economic impact assessment of carbon from NH keeps changing, i.e. in 2020 the Outline Business Case established a cost of carbon of £122m and this has increased to £523m in 2022. The difference has not been explained. Any additional increase would further reduce the 'Value for Money' of the scheme (para 58d)*	This issue is linked to the existing Thurrock Council Statement of Common Ground matter (Item No. 2.1.156) regarding 'value for money' in the 'Traffic and Economics' section. This issue will be added to 2.1.156. The economic appraisal of the Project is presented in the Combined Modelling and Appraisal Report [**Application Document APP-518**]. The Outline Business Case was produced in 2020, with the appraisal undertaken for the DCO application undertaken in 2022. The value quoted by the representor (-£122m) is from the withdrawn DCO application submitted in 2020. The value of -£523m is not recognised by the Applicant; the value within the DCO application is -£528m as is set out in paragraph 8.5.11 of ComMA Appendix D - Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**].	Matter Under Discussion
Traffic and Economics	*Asda roundabout – NH has so far refused to undertake local junction modelling of this junction explaining that the LTAM model demonstrates it works satisfactorily – this is despite the fact that at Orsett Cock junction local junction modelling demonstrates serious issues whereas the LTAM model does not (refer to Sub Section III above), i.e. demonstrating a contradiction of evidence. The Council therefore contends that this junction requires detailed analysis to demonstrate its acceptability during construction and for NH to*	This issue is linked to the existing Thurrock Council Statement of Common Ground matter (Item No. 2.1.150) regarding 'Construction impact on Asda Roundabout' in the 'Traffic and Economics' section. This issue will be added to 2.1.150. The Applicant does not agree with the council's assertions in relation to the Orsett Cock junction or Asda roundabout. The Applicant has shared detailed outputs from the LTAM with the council for their authority	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	commit to any mitigation that is deemed necessary. (para 39 c)	area. The forecast impact of the Project on the road network once the Project is in operation is, set out in Chapter 7 of the Transport Assessment (TA) [**Application Document APP-529**]. TA Appendix B Journey Time Changes 2030 [**Application Document APP-531**] show that the change in journey times along these routes is sometimes positive and sometimes negative. Where there is forecast to be a negative change (i.e. an increase in journey time) the increase is small in relative terms (max 5.1%) and in all cases, less than one minute. In many places on the network, and within Thurrock, there will also be beneficial impacts on the network. Overall, the benefits on the road network outweigh the adverse impacts, and this is reflected in the positive economic benefit of the Project within Thurrock. The Asda roundabout is one of the locations identified within Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**], which means that monitoring would be undertaken at this location as set out within Chapter 5.	
Climate and Carbon	*No provision is made for the measures needed to support rapid electrification of the vehicles fleet, such as provision for electrical distribution and charging facilities, as set out as being critical for the decarbonisation of the surface transport sector in Decarbonising Transport (July 2021) and the Carbon Budget Delivery Plan (March 2023); (49, i)*	This issue is linked to the existing Thurrock Council Statement of Common Ground matter (Item No. 2.1.266) regarding 'Future changes in vehicle due to electrification' in the 'Climate and Carbon' section. This issue will be added to 2.1.266. Decarbonising road traffic in the UK is a national issue, being addressed by the UK	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
		Government and the Department for Transport. It is not being addressed on a project-by-project basis, in this case a new project representing only a proposed 14 mile (23km) section of the 4,500 mile long strategic road network. The Applicant is supporting the decarbonisation of the vehicle fleet in a number of ways, as set out in their 2021 document Net zero highways: our 2030 / 2040 / 2050 plan. As stated in the plan, many of the actions that will deliver the ambition of net zero transport on the road network are outside of National Highways' direct control.	
Route Selection, Modal Alternatives & Assessment of Reasonable Alternatives	*There is no strategy for charging/demand management to reduce/control demand beyond replicating the charging regime of the Dartford Crossing. (49, j)*	This issue is linked to the existing Thurrock Council Statement of Common Ground matter (Item No. 2.1.69) regarding 'Future Proofing the LTC' in the 'Route selection, modal alternatives & assessment of reasonable alternatives' section. This issue will be added to 2.1.69. The Road User Charging Statement [**Application Document APP-517**] sets out the rationale for charging and the powers that are being sought in the draft DCO [**Additional Submission AS-038**].	Matter Under Discussion
Climate and Carbon	*NH assessment of carbon impacts is inadequate, incomplete and inconsistent. It uses out of date economic and policy assumptions about the value of carbon. The analysis of traffic growth and vehicle fleet composition are inconsistent with the assessment of carbon and the assessment of carbon impacts of the scheme are incomplete.*	This issue is linked to the existing Thurrock Council Statement of Common Ground matter (Item No. 2.1.264) regarding 'Responding to National Policy changes on Climate Change and Decarbonisation' in the 'Climate and	Matter Under Discussion

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Heading	Matter	The Applicant's response	Status
	Overall, the analysis is inconsistent with the Net Zero Strategy, Decarbonising Transport and NH's own Net Zero Highways commitments. The Council contends that the NH assessment is fundamentally flawed, and this will be covered in detail within the LIR (54)	Carbon' section. This issue will be added to 2.1.264. The Applicant does not accept that these are reasonable criticisms of the approach taken to the assessment of the carbon impacts of the Project. The Applicant's assessments are based upon accepted methodologies used extensively across the industry and in line with Government guidance. The Project's compliance and alignment with legislation, policy and plans relevant to climate are presented in ES Appendix 15.1 Climate Legislation and Policy [**Application Document APP-480**] and Planning Statement Appendix I – Carbon Strategy and Policy Alignment [**Application Document APP-504**]. The economic appraisal of carbon is set out in the Combined Modelling and Appraisal Report – Appendix D – Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**] whilst an assessment of the Project's greenhouse gas (GHG) emissions in the context of the UK carbon budgets is presented in ES Chapter 15: Climate [**Application Document APP-153**]. The Applicant will review and respond to the specific comments made on the assessments of carbon when the council's Local Impact Report becomes available.	

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Table 2.72 New Matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Air Quality Noise and Vibration Land and Property Traffic and Economics Climate and Carbon	*Information requests – environmental disciplines and land related queries (para 43, 65, 101)*	The information requests (related to environmental queries) mentioned by Thurrock Council have been responded to on 27 April 2023. The land related queries are currently under discussion (last meeting held on 26 May 2023) before a formal response is issued by the Applicant.	Closed
Climate and Carbon	*Insufficient information is provided to examine the carbon calculations and NH has not yet responded to the Council's request for further information in December 2022 (para 58 a)*	Please refer to ES Chapter 15: Climate [**Application Document APP-153**], the GHG assessment scenarios presented in Table 15.3 of ES Chapter 15 and the Carbon and Energy Management Plan [**Application Document APP-552**] for the relevant information. The information requests (related to climate and carbon queries) mentioned by Thurrock Council have been responded to on 27 April 2023.	Closed
	It is understood that the Government is also about to impose a requirement to 'Quantify Carbon Reductions' on local authorities through the process of developing their Local Transport Plans. This requirement clearly demonstrates that the need for significant carbon reduction at the local authority scale is vital, yet no obligation has yet been placed on National Highways to meet the need to 'Quantify Carbon Reductions'. This is obviously inconsistent and undermines the argument that carbon impacts from LTC's operation are insignificant. (para 57)	Whilst local authorities may in future have a responsibility to quantify carbon reductions as part of the process for developing their 'Local Transport Plans', this is not currently the case. The Applicant's assessment complies with, and indeed goes beyond, up-to-date requirements. If those requirements change the Applicant will respond accordingly.	Closed

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Heading	Matter	The Applicant's response	Status
	Assumptions around electric vehicle uptake do not appear to reflect latest DfT guidance (NH only assumes a 44% uptake by 2050, not the 67% assumed in the November 2022 version of WebTAG) and neither provide a deliverable pathway to net zero for the surface transport sector without other, demand management measures being provided (para 58 b)	Please refer to the GHG assessment scenarios presented in Table 15.3 of ES Chapter 15: Climate [**Application Document APP-153**]. A description of how the future baseline was forecasted, particularly in relation to road user emissions is included in paragraphs 15.3.37–15.3.41. The net changes in GHG emissions forecast using both the TAG GHG Workbook method and Transport Decarbonisation Plan sensitivity test are presented in Table 15.16.	Closed
	LTC will generate a new power demand in both construction and operation, especially with the increased movement predicted. The infrastructure required to generate and distribute will be additional to infrastructure already planned for to enable economic growth locally and nationally. The cost of the power generation, distribution and capacity needed to provide for this additional demand has not been factored into the NH appraisal. Nor has the cost to the local economy of constraining available generating capacity during construction, i.e. the cost of additional reinforcement required for any subsequent housing growth been taken into account. The appraisal is not complete without this data being provided (para 58c)	The Project requires power to enable its construction and operation, however it does not require any additional infrastructure to generate that power. The legal powers to carry out works to supply energy for the construction of the Project are sought and have been assessed within the DCO application. The anticipated demand has been discussed and secured with UK Power Networks (UKPN) who are the distribution network operator. The Project continues to liaise with UKPN to understand any conflicts or impacts with other developers' proposals and any opportunities to release secured capacity back to the network. The Project contributes to the operation and maintenance of the electricity infrastructure via the payment of its electricity bill which has been considered as part of the Project costs.	Closed
Air Quality Noise and Vibration	*The Council's analysis of air quality/ noise impacts based on previous DCO submission following NH failure to supply data (para 66)*	The Applicant is unsure of this analysis carried out by Thurrock Council as it has not been shared. However, it should be noted that the Applicant considers the data and the assessment presented in the Environmental Statement, included as part of the DCO submission to be the most recent.	Closed

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Heading	Matter	The Applicant's response	Status
Landscape and Visual	*In addition, with regard to effects on health of light pollution, since DCOv1 there have been numerous changes to elements of the scheme, including the A13/A1089 junction and connections to Orsett Cock and the A128; raising the level of the LTC around North Road, South Ockendon, the arrangement of false-cuttings and other landscape mitigation and the proposed incorporation of tall earth bunds around the A13/A1089 junction. These changes have potential to increase light pollution, or if appropriately designed, to help mitigate some of the effects. The Council has concerns about consequential lighting impacts to understand how areas of the Borough will be affected by LTC (para 68)*	Temporary lighting during construction would be designed, positioned and directed to prevent or minimise light disturbance, as set out in Section 6.8 of ES Appendix 2.2: Code of Construction Practice [**Application Document APP-336**]. The use of operational lighting as part of the Project would be minimised where safe to do so, and operational lighting would be '*controllable, directional and as low-level as is practicable and safe*', as stated in clauses LST.02 and LST.03 of the Design Principles [**Application Document APP-516**]. Light pollution, as a topic with the potential to affect people's health and well-being, was scoped in to the Health and Equalities Impact Assessment (HEqIA) [**Application Document APP-539**] for both construction and operational phases of the Project. The assessment concludes (Tables 7.50 and 7.51) that the health outcome for both general and sensitive populations/communities as a result of changes in light pollution during both construction and operation phases is considered to be neutral. Changes to the night-time environment in terms of effects on the landscape and night-time views have been assessed within ES Appendix 7.9: Schedule of Landscape Effects [**Application Document APP-384**] and ES Appendix 7.10: Schedule of Visual Effects [**Application Document APP-385**].	Closed
DCO and Consents	*A number of the requirements (as currently drafted) refer to consultation with the relevant planning authority. There are no details in the draft DCO as to how long this consultation will be or how it will take place. However, it is understood from NH*	The draft DCO [**Additional Submission AS-038**] sets out the procedure for the discharge of requirements in Schedule 2, Part 2. Requirement 18(1) of Schedule 2 to the draft DCO states that the discharge period for the Secretary of State (SoS) is eight weeks.	Open

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Heading	Matter	The Applicant's response	Status
	verbally that the consultation period will be four weeks, with the ability to extend to 6 weeks. (107 a)	Paragraph 20 states that, where a requirement necessitates consultation with any authority or statutory body prior to an application being made to the SoS to discharge a requirement, a period of 28 days is allowed which can be extended to 42 days by request and agreement. This extended period acknowledges that there may be circumstances where complex matters necessitate a longer period.	
Legacy	*The number of technically agreed Hatch measures is 16 but these are subject to Council members approval. Although updates have been provided to council members, delay is accredited to NH; the need to explain every measure repeatedly to NH and the resistance from NH to resolve council's requests despite regular tracking and agreed actions. (para. 112)* *30 hatch matters have the potential to be technically agreed but await either further information, further technical discussions, or a changed NH position. Some of these measures require finalisation and inclusion in the s106 HOT.(para. 114)*	Thurrock Council's concerns regarding the progress of technical issues is noted under Item 2.1.75 of the SoCG [**Application Document APP-130**].	Closed
Land and Property	*NH policy documents 'Your Property and Blight', 'Your Property and Compensation or Mitigation for the Effects of Our Road Proposals', 'Your Property and Discretionary Purchase' and 'Your Property and Compulsory Purchase' should be included within the DCO application (para 102,b)*	The Applicant's obligations in relation to compensation are set out in statute and the policies reflect this. There is no need to secure these policies as they are legal obligations, and it would be inappropriate in principle to duplicate the obligations. It should be noted that compensation is a matter for government, and if the government determines that a different policy should apply then it would be inappropriate for the Applicant to take a different view.	Closed

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Heading	Matter	The Applicant's response	Status
Socio-Economics	*The draft Section 106 HoT (Planning Inspectorate Ref. No. APP-505) do not contain any elements originally requested by the Council in January 2022 and are just Skills, Education and Employment Strategy, the NH proposed Community Fund, Officer Support Contributions and Pedestrian Crossing Improvements south of the River Thames. (para 97)*	The Applicant had four meetings with Thurrock Council from January–August 2022 on potential section 106 (s106) items. The purpose of these meetings was to go through the list of s106 elements requested by the council in January 2022, and discuss their suitability to be included in the s106 Heads of Terms [**Application Document APP-505**]. As a result of this sieving exercise several elements requested by the council were either found to be unsuitable for inclusion in s106 Heads of Terms, duplicates already requested under a different workstream and/or worthy of further discussion. An audit trail and meeting notes were provided for each meeting. No comments were received from Thurrock Council on the notes of the last meeting in August 2022. Therefore, the Applicant has concluded that all the items included in the s106 Heads of Terms in the DCO submission have been the direct result of these discussions. The Applicant remains open to further discussions on s106 matters during the Examination.	Open
	The Council has strongly recommended to NH that the SEE Strategy be included within the DCO submission as a control document, but limited parts of the Strategy have been included within the Section 106 HoT (para 98,a)	As requested by Thurrock Council, the complete Skills, Education and Employment (SEE) strategy has already been appended to the draft Section 106 Heads of Terms [**Application Document APP-505**], as Appendix B, submitted with the DCO application.	Closed

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2.47 Thurrock Power Limited

Introduction

2.47.1 Thurrock Power Limited (TPL) has the benefit of a DCO for a flexible generation plant, granted in February 2022 (TPL DCO). The TPL DCO consents a combination of reciprocating gas engine electricity generation and battery storage (with associated development) primarily on land to the north of the existing National Grid Tilbury substation. The Order Limits of that granted DCO and the Project overlap and there are a number of interfaces between the consented TPL DCO and the proposed Project.

2.47.2 TPL are a prescribed consultee under s42(1)(a) of the Planning Act 2008 and were notified of the statutory pre-application consultation and subsequent phases of non-statutory consultation.

2.47.3 The Applicant and TPL prepared an SoCG that was submitted as part of the DCO Application **[Application Document APP-103]**.

2.47.4 All of the issues raised in TPL's RR are represented within the SoCG.

Overview of matters raised in TPL's RR

2.47.5 The Applicant has undertaken a detailed review of all matters raised in TPL's RR. The matters included some that are the same or fundamentally similar as those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them. Table 2.73 sets out those issues and provides references within that SoCG.

Table 2.73 Matters raised prior to the RR Period and acknowledged within the SoCG

Heading	Topic	Item No.	Link
Design – Road, Tunnels, Utilities	Location of gas pipeline diversion under the route alignment	2.1.1	**[Application Document APP-103]**
Construction	Substation Road shared access	2.1.2	
	Conveyor route height clearance above access road	2.1.3	
	Construction interface agreement	2.1.4	
Protective Provisions	Protective Provisions	2.1.5	

2.47.6 There are no new matters raised in the RR to be included in the SoCG.

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2.48 Tonbridge and Malling Borough Council

Introduction

2.48.1 Tonbridge and Malling Borough Council (TMBC) is a host authority in respect of the application and as such is a category 'B' local authority under section 43 of the Planning Act 2008. At Statutory Consultation, the borough council was categorised as an A authority but became a B host authority as a result of changes presented at the Local Refinement Consultation. TMBC was notified under s42(1)(b) of the Planning Act of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.48.2 The Applicant and TMBC prepared an SoCG that was submitted as part of the DCO Application **[Application Document APP-131]**.

Overview of matters raised in Tonbridge and Malling Borough Council's RR

2.48.3 The Applicant has undertaken a detailed review of all matters raised in TMBC's RR. The matters included some that are the same or fundamentally similar as those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them. Table 2.74 sets out those issues and provides references within that SoCG.

Table 2.74 Matters raised prior to the RR Period and acknowledged within the SoCG

Heading	Topic	Item No.	Link
Need for the Project	Need for the Project	2.1.1	[**Application Document APP-131**]
Traffic and economics	Local plan growth	2.1.4	
	Local modelling requests	2.1.5	
	Modelling methodology	2.1.6	
Wider Network Impacts	Non-Project highway improvements	2.1.7	
	Local Wider Network Impacts concerns	2.1.9	
	Non-Project highway improvements	2.1.10	
	Local Wider Network Impacts concerns	2.1.11	
	Non-Project highway improvements	2.1.12	
EIA methodology	Assessment methodology	2.1.14	
Air quality	Assessment of likely significant effects	2.1.15	

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Heading	Topic	Item No.	Link
Nitrogen deposition	General methodology / modelling / alternatives	2.1.16	
	General methodology/ modelling/ alternatives	2.1.17	
	Site selection and surveying	2.1.18	
	Site selection and surveying	2.1.19	
	Kent Downs AONB	2.1.20	
	Detailed design/ management plans/ implementation	2.1.21	
	Detailed design/ management plans/ implementation	2.1.22	

2.48.4 There were no new matters raised in the RR.

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2.49 Transport for London

Introduction

2.49.1 Transport for London (TfL) was notified under s42(1)(a) of the Planning Act of pre-application consultation and given opportunities to respond to each phase of statutory and non-statutory consultation.

2.49.2 The Applicant and TfL prepared an SoCG that was submitted as part of the DCO Application **[Application Document APP-129]**.

2.49.3 Most of the issues raised in TfL's RR are represented within the SoCG, however there are some new matters which are not included in the SoCG so far and these have been presented below.

Overview of matters raised in TfL's RR

2.49.4 The Applicant has undertaken a detailed review of all matters raised in TfL's RR. The matters included some that are the same or fundamentally similar to those addressed within the SoCG that was submitted as part of the DCO application, along with an explanation of the Applicant's position on them. Table 2.75 sets out those issues and provides references within that SoCG. Table 2.76 New Matters raised in RR, which are addressed in the SoCGs submitted at DL 1. Table 2.77 sets out Matters raised in RR, which have been addressed outside of the SoCG.

Table 2.75 Matters raised prior to the RR Period and acknowledged within the SoCG

Heading	Topic*	Item No.	Link
Need for the Project	Benefits of the Project	2.1.3	
Land and compulsory acquisition	Land acquisition	2.1.7	
	Impacts	2.1.8	
	Impacts	2.1.9	
	Compensation	2.1.11	
Air quality	Monitoring	2.1.17	
	Assessment of likely significant events	2.1.18	
Landscape and visual	Plants and woodlands	2.1.20	
Noise and vibration	Assessment of likely significant effects	2.1.21	
Population and human health	Maintenance	2.1.23	
Wider Network Impacts	Local Wider Network Impacts concerns	2.1.27	
	Wider Network Impacts approach	2.1.28	
Climate	Legislative and policy frameworks	2.1.30	

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Table 2.76 New Matters raised in RR, which are addressed in the SoCGs submitted at DL 1

Heading	Matter	The Applicant's response	Status
Traffic and economics	*However, the Applicant's modelling which TfL is being asked to rely on includes an important shortcoming. The model zoning has been aggregated within London, resulting in short distance local trips being omitted from the model, and congestion therefore being underestimated at key junctions – an issue that the Applicant acknowledges – including for areas in close proximity to the Project.* […] TfL provided an updated version of this text for inclusion in the SoCG as follows: '*Transport for London is concerned about the robustness of the strategic traffic modelling within London. The model zoning has been aggregated within London compared to the source models used to create the Lower Thames Area Model. This results in short distance local trips being omitted from the model, and congestion therefore being underestimated at key junctions, including for areas in close proximity to the Project. This undermines confidence in the ability of the model to serve as the only basis for determining the need for mitigation of operational traffic, air quality and noise impacts.*'	**This matter has been added to the SoCG as Item 2.1.32.** The Project's transport model has been produced in line with DfT guidance (Transport Analysis Guidance (TAG)) as set out in the Combined Modelling and Appraisal Report [**Application Document APP-518**]. The zoning system for the transport model is described in Combined Modelling and Appraisal Report Appendix B: Transport Model Package [**Application Document APP-520**]. The Applicant does not agree with the suggestion that the size of the zones has led to an underprediction of traffic flows at key junctions.	Matter Under Discussion

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Table 2.77 New Matters raised in RR, which have been addressed outside of the SoCG

Heading	Matter	The Applicant's response	Status
Traffic and Economics	*The Applicant is entirely relying on demand forecasting and modelling undertaken in the early 2020s using a pre-pandemic baseline for a scheme not due to open until 2030.*	The Project's transport model has been produced in line with DfT guidance (Transport Analysis Guidance) as set out in the Combined Modelling and Appraisal Report [**Application Document APP-518**]. Growth within the transport model is in line with DfT traffic forecasts as set out in their National Trip End Model and published as TEMPro 7.2 traffic growth forecasts. The Applicant's proposed approach to wider network impacts is set out within the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**]. At the locations to be monitored, data would be collected both before and after the opening of the Project.	Open
	The modelling undertaken by the Applicant shows that, for London as a whole, there is a slight reduction in traffic due to capacity at the Dartford Crossing being freed up, allowing some trips within London to divert to a faster route on the M25/A282. However, the modelling forecasts increased traffic on specific sections of the TLRN. The greatest impacts for the TLRN are on the A127 west of M25 Junction 29, where TfL's analysis of the Applicant's modelling shows increases in traffic flow in each direction as high as 700 Passenger Car Units in the morning peak hour as soon as the Project opens in 2030. Significant increases in traffic also occur on other parts of the TLRN, namely the A13, A2 and A20.	The forecast impacts on the highway network as a result of the Project are set out within Chapter 7 of the Transport Assessment [**Application Document APP-529**]. This includes a scale of impacts based on this assessment which identifies locations that are forecast to see either beneficial or adverse impacts. Beneficial impacts on the TLRN are shown on the A12 and A127, whilst adverse impacts on the TLRN are shown on the A127, A2 and A13. The Project's approach to wider network impacts is set out in the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**]. This details a number of locations to be monitored, which includes the A127 west of the M25. Further locations to be monitored would be agreed with local highway authorities through the process set out at paragraphs 5.36–5.37.	Closed

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3 Relevant Representations submitted by Interested Parties with whom the Applicant does not have a Statement of Common Ground

3.1 Introduction

Consideration

3.1.1 Relevant Representations (RRs) submitted by organisations with whom the Applicant does not have an SoCG have all been individually considered by the Applicant's Project team.

3.1.2 Each issue contained within these RRs has been assigned to a category, using the same theme-based headings that are used to structure the SoCGs, which are:

a. DCO and Consents

b. Need for the Project

c. Planning Statement and Policy

d. Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives

e. Consultation and Engagement

f. Land and Compulsory Acquisition

g. Design for Roads, Tunnels and Walking, Cycling and Horse Riding Provision

h. Construction (General and Highways)

i. Construction (Tunnels and Utilities)

j. Operation and Maintenance

k. Charging

l. Traffic and Economics

m. Wider Network Impacts

n. Sustainability

o. Socio-economics

p. EIA Methodology

q. Air Quality

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r. Cultural Heritage

s. Landscape and Visual

t. Terrestrial Biodiversity

u. Marine Biodiversity

v. Geology and Soils

w. Material Assets and Waste

x. Noise and Vibration

y. Population and Human Health

z. Road Drainage and the Water Environment

aa. Climate

bb. Cumulative Effects

cc. Habitat Regulations Assessment

dd. Nitrogen Deposition

ee. Protective Provisions.

3.1.3 All of the issues raised in the RRs can be categorised using one or more of these headings.

3.1.4 A series of sub-categories were created for each category, so that points of detail within RRs could be captured, considered and responded to. For example, if issues in RRs raised the assessment of noise and vibration impacts, they were categorised as 'Noise and Vibration – Assessment'.

3.1.5 Once all RRs had been reviewed, each issue was reviewed by the relevant Project team or teams. Consideration was given to whether the issue in question has already been addressed by an Application document and whether any additional information would be required to provide a response in this report.

3.1.6 Many of the RRs contain identical or similar statements, but each RR has been treated as an individual submission.

Reporting

3.1.7 Sections 3.2 to 3.3.2 in this chapter each report on a different theme-based heading. At the beginning of each section is an explanation of how many RRs from non-SoCG individuals and organisations raised an issue that was categorised with that heading (if any). The section then provides a list of relevant Application Documents that address issues raised within that SoCG heading.

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3.1.8 The remainder of each section comprises a table in which issues from the RRs are summarised, along with the Applicant's response. Where appropriate, several issues are answered with a single response.

3.1.9 As described in the Executive Summary, Appendix A contains a table setting out the names of all IPs and the SoCG headings that were used to categorise the issues identified in their RRs.

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3.2 DCO and Consents

Introduction

3.2.1 A total of 18 of the IPs with whom the Applicant does not have an SoCG raised the topic of DCO and Consents in their RRs.

3.2.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-002 1.2 Application Form

b. APP-003 1.3 Introduction to the Application

c. APP-005 2.1 Location Plan

d. APP-057 3.2 Explanatory Memorandum

e. APP-060 4.1 Statement of Reasons

f. APP-140 6.1 Environmental Statement – Chapter 2 – Project Description

g. APP-151 6.1 Environmental Statement – Chapter 13 – Population and Human Health

h. APP-336 Environmental Statement – Appendix 2.2 – Code of Construction Practice, First Iteration of Environmental Management Plan

i. APP-490 6.7 Outline Landscape and Ecology Management Plan

j. APP-498 7.2 Planning Statement – Appendix C – Local Authority Policy Review

k. APP-502 7.2 Planning Statement – Appendix G – Private Recreational Facilities

l. APP-516 7.5 Design Principles

m. APP-550 7.17 Interrelationship with other NSIP Projects and Major Development Schemes

n. AS-002 1.4 Navigation Document

o. AS-004 1.6 Errata Report

p. AS-038 3.1 Draft Development Consent Order (DCO)

q. AS-040 4.1 Statement of Reasons

r. PD-013 Rule 6 letter – notification of the preliminary meeting and matters to be discussed

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Table 3.1 Summary of issues raised in RRs concerning DCO and Consents, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concerns about the adequacy of specified materials in the DCO application. These include concerns over the scale and accessibility of maps explaining the predicted impacts of the proposals on land and property.	The Project comprises a number of Nationally Significant Infrastructure Projects (NSIPs) (the road element of the Project and four utility diversions that count as NSIPs in their own right) and development consent must be obtained from the Secretary of State in order for the Project to be implemented. For more information about the Project, see Environmental Statement (ES) Chapter 2: Project Description [**Application Document APP-140**]. An application for a DCO must be made to the Secretary of State, by means of the Planning Inspectorate, under section 37 of the Planning Act 2008. The Planning Inspectorate, in accepting the Application for development consent in November 2022, stated that the Applicant has complied with Chapter 2 of Part 5 of the Planning Act 2008, including carrying out the necessary pre-application consultation with stakeholders, land interests and the public. The Application is made up of several hundred individual documents, comprising reports, maps and drawings, organised within seven volumes. The purpose and contents of these seven volumes are described in the Introduction to the Application [**Application Document APP-003**], with an accompanying Navigation Document [**Additional Submission AS-002**] listing each document and its Examination Library Reference Number. The Application documents were prepared in accordance with all relevant requirements and guidance, making use of the Applicant's extensive experience of preparing DCO applications. In many instances, draft documents were shared with technical stakeholders, including local authorities and statutory undertakers, prior to submission in order to improve their accuracy and readability. Errors in Application documents that have been identified by the Applicant or brought to its attention by other parties are reported in The Errata Report [**Additional Submission AS-004**]. Additional submissions that have been permitted by the Examining Authority are also listed in the Application Library. The Examination period provides a further opportunity for Application documents to be scrutinised, and the Applicant is committed to correcting or revising any additional issues that might be identified with the material submitted.
Comments expressing concern that the process of gaining consent for the Project is too long.	The development consent process is carried out according to procedural rules determined by the Planning Act 2008 and the Planning Inspectorate, acting on behalf of the Secretary of State. The Pre-Examination and Examination schedule is determined by the Examining Authority, a group of people delegated by the Planning Inspectorate to carry out a thorough inspection of the Applicant's proposals. The schedule for the consent process is designed to give the public and stakeholders the opportunity to understand and comment on the Project, and the Examining Authority to understand the proposals well

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	enough to make a recommendation to the Secretary of State as to whether the Project should be granted consent or not.
Comment expressing concern about the impacts of the Project on private leisure facilities, including a golf course and football pitches, including a suggestion that the DCO application does not adequately address these impacts.	The impact of the Project on private leisure facilities is considered in ES Chapter 13: Population and Human Health [**Application Document APP-151**] and in Planning Statement Appendix G Private Recreational Facilities [**Application Document APP-502**]. **Gravesend Golf Centre** The impact upon Gravesend Golf Centre is considered in ES Chapter 13: Population and Human Health [**Application Document APP-151**] and in Planning Statement Appendix G Private Recreational Facilities [**Application Document APP-502**]. Paragraphs 13.6.37 and 13.6.38 of ES Chapter 13: Population and Human Health [**Application Document APP-151**] note that the facility has been closed for a number of months. The facility is to be relocated on adjacent land that is greater in area than the original facility and would be equally accessible. Paragraph G.4.20 of Planning Statement Appendix G Private Recreational Facilities [**Application Document APP-502**] states that: *'It should be noted that there is ongoing engagement with the current operator on the detail of the replacement facility.'* The ongoing engagement is set out in No. 901 of the Statement of Reasons [**Additional Submission AS-040**]. The replacement provision is secured by means of Requirement 3 (detailed design) of Schedule 2 (Requirements) of the draft DCO [**Additional Submission AS-038**]. **Orsett Park Royals Football Club** Orsett Park Royals Football Club no longer uses the site to the north-west of the Orsett Cock junction. It has therefore not been assessed as a private recreational facility in the Project's application for development consent. The football club's licence was terminated by the landowner in June 2022. The landowner has monitored the use of the site to ensure that there is no *de facto* use thereafter and confirmed to the Applicant on 15 February 2023 that the field is no longer used by football clubs.
Comments highlighting the potential impacts of the Project on other planned developments, including a solar farm, in the vicinity of the Project and asking for proper consideration of these as part of the DCO process.	The document Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes [**Application Document APP-550**] describes how the Applicant has worked with third-party project promoters to design out and control interfaces between the Project and these schemes. Appendix C to the Planning Statement (Local Authority Policy Review) [**Application Document APP-498**] describes the Project's alignment and conformity with local authority development plan and other related policy (as relevant to the Project). **Impact on solar farm** With regard to the solar farm, a representation has been received that relates to the Ockendon Solar Farm/Bulphan Fen Solar Farm. Pages 1,335 and 1,336 in Annex B of the Statement of Reasons [**Additional Submission AS-040**] set out the discussions that have taken place

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	over the period since February 2019 between the Applicant and Ockendon Solar Limited (No. 687). Paragraph 13.6.110 of ES Chapter 13: Population and Human Health [**Application Document APP-151**] identifies the area of Ockendon Solar Farm as development land, and assess the impact of the Project on the solar farm. In light of the minimal interface between the Project and the solar farm, and the fact that the solar farm will be built and operating by the time the Project receives consent, the potential for the Project to prejudice the operation of the solar farm is minimal.
Comments seeking assurances concerning the securing of mitigation measures outlined in Applicant documents such as the Code of Construction Practice and the Design Principles.	The measures on which assurances are sought are contained in the Code of Construction Practice (CoCP) Register of Environmental Actions and Commitments (REAC) which is presented at Section 7 of Appendix 2.2 of the ES [**Application Document APP-336**] and the Design Principles [**Application Document APP-516**]. These actions and commitments in the CoCP and REAC are legally secured through Requirement 4 of Schedule 2 of Part 1 of the draft DCO [**Additional Submission AS-038**] (page 119), while the Design Principles are legally secured via Requirement 3 of the draft DCO (pages 118/119), as well as Requirement 5.
Comments asserting the respondents' intention or desire to be involved in the DCO process as it progresses.	On 25 April 2023 the Examining Authority appointed by the Secretary of State for Levelling Up, Housing and Communities to carry out an examination of the Applicant's application for development consent to build the Project issued a Rule 6 letter [**PD-013**]. This set out the draft Examination Timetable and Initial Assessment of Principal Issues and includes information regarding specific opportunities for Interested Parties to participate. The Examining Authority is responsible for the Examination process.
Comment expressing concern about the financial constraints of Thurrock Council and the effects this may have on the local authority's ability to engage with the DCO process.	The Applicant understands that Thurrock Council intends to participate fully in the Examination process.

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3.3 Need for the Project

Introduction

3.3.1 A total of 447 of the IPs with whom the Applicant does not have an SoCG raised the topic of the Need for Project in their RRs.

3.3.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-139 6.1 Environmental Statement – Chapter 1 – Introduction

b. APP-153 6.1 Environmental Statement – Chapter 15 – Climate

c. APP-480 6.3 Environmental Statement – Appendix 15.1 – Climate Legislation and Policy

d. APP-494 7.1 Need for the Project

e. APP-495 7.2 Planning Statement

f. APP-496 7.2 Planning Statement – Appendix A – National Policy Statement for National Networks (NPSNN) Accordance Table

g. APP-498 7.2 Planning Statement – Appendix C – Local Authority Policy Review

h. APP-504 7.2 Planning Statement – Appendix I – Carbon Strategy and Policy Alignment

i. APP-522 7.7 Combined Modelling and Appraisal Report – Appendix C – Transport Forecasting Package

j. APP-526 7.7 Combined Modelling and Appraisal Report – Appendix D – Economic Appraisal Package: Economic Appraisal Report

k. APP-528 7.8 Traffic Forecasts Non-Technical Summary

l. APP-529 7.9 Transport Assessment

m. APP-539 7.10 Health and Equalities Impact Assessment

n. APP-545 7.12 Wider Network Impacts Management and Monitoring Plan

o. APP-552 7.19 Carbon and Energy Management Plan

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Table 3.2 Summary of issues raised in RRs concerning the Need for the Project, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about the need for the Project, including whether Project would achieve its objective of providing congestion relief at the Dartford Crossing. There were also concerns about possible traffic growth as a result of the Project, the design capacity of the proposed road, and increased congestion on the wider road network.	Chapter 3 of the Need for the Project [**Application Document APP-494**] demonstrates how the strategic need for the Project has been recognised and identified in national, regional and local level policy documents. It sets out the need for development in accordance with the National Policy Statement for National Networks (NPSNN), the Government's policy and strategic vison and objectives. The Transport Assessment (TA) [**Application Document APP-529**] sets out an assessment of the transport impacts on the strategic and local road networks as a result of the Project, in accordance with the methodologies identified in a wide range of relevant guidance produced by the Applicant; the Department for Transport (DfT); the Ministry of Housing, Communities and Local Government (now the Department for Levelling Up, Housing and Communities); and Transport for London (TfL). The Wider Network Impacts Management and Monitoring Plan (WNIMMP) [**Application Document APP-545**] reports the Applicant's approach to the forecast of wider network impacts of the Project as presented in the TA. Chapter 3 of the WNIMMP explains how the wider network impacts have been considered against the NPSNN and other important and relevant policies. **Reducing congestion at Dartford** The Scheme Objectives set out in Table 4.1 of the Planning Statement [**Application Document APP-495**] include relieving the congested Dartford Crossing and its approach roads, improving their performance by providing free-flowing north-south capacity, improving the resilience of the River Thames crossings and the major road network, and improving safety. Chapter 5 of the Need for the Project [**Application Document APP-494**] shows that the Project would reduce congestion at the Dartford Crossing and create additional capacity across the River Thames east of London. This additional connectivity would improve the ability for local traffic to cross the River Thames and would support sustainable development and economic growth, locally, regionally and nationally. It would help meet the demands of future traffic growth east of London as detailed in the Combined Modelling and Appraisal Report – Appendix C – Transport Forecasting Package [**Application Document APP-522**] and the Combined Modelling and Appraisal Report – Appendix D – Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**]. **Economic benefits of the Project** These improvements would make the local area and the South East more attractive for businesses to locate and contribute to the promotion of a competitive local economy. With more certainty over journey times and commuting costs in the Lower

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	Thames area, firms and workers would both be more willing to look further afield for business and employment opportunities across the River Thames. While the Dartford Crossing infrastructure remains available for many years of future service, by providing a crossing of the River Thames, the Project would improve the resilience of the road network in the event of a longer-term closure of part of the Dartford Crossing or its approach roads for maintenance and improvements. The TA [**Application Document APP-529**] shows the Project would significantly improve journey times and reduce congestion on the Dartford Crossing and approach roads while also providing over 80% additional road capacity across the River Thames east of London. The TA [**Application Document APP-529**] provides an assessment of the forecast highway network impacts as a result of the Project and concludes at paragraph 11.4.2 that: *'The Project would provide considerable relief to the current levels of congestion at the Dartford Crossing, while allowing for a substantial increase in the number of vehicles able to cross the River Thames using either the Dartford Crossing or the Project.'.* The Traffic Forecasts Non-Technical Summary [**Application Document APP-528**] provides details of the changes in volume over capacity (from paragraph 5.2.29), with Plates 5.10 to 5.15 showing this for the Do Minimum (without the Project) and Do Something (with the Project) scenarios, across each of the modelled time periods. **Impacts on the wider road network** The Applicant has identified the beneficial and adverse impacts on traffic flows across the road network during operation, and this assessment is set out in Section 7.6 of the Transport Assessment [**Application Document APP-529**]. The WNIMMP presents the approach proposed to monitoring the traffic impacts of the Project on the wider road network once the Project is operational. The WNIMMP sets out how the traffic impact monitoring scheme would be implemented (to be approved by the Secretary of State and implemented by National Highways) pursuant to Requirement 14 in Schedule 2 to the draft DCO (Application Document 3.1). It allows the local highway authorities to understand the potential impacts of the Project and ways in which they can bid for support as part of existing and future funding streams for local road network improvements and upgrades. The TA [**Application Document APP-529**] presents where there would be changes to the road network on roads away from the Project alignment during both the construction and operational phases of the Project. Chapter 1 of the WNIMMP [**Application Document APP-545**] presents the proposed approach to

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	monitoring the traffic impacts of the Project on the wider road network once the Project is operational. Overall, the benefits on the road network substantially outweigh the adverse impacts. The identified wider network impacts have been considered against the NPSNN and other important and relevant policies, and are reported in Chapter 6 of the Planning Statement [**Application Document APP-495**] and the Planning Statement – Appendix A – National Policy Statement for National Networks (NPSNN) Accordance Table [**Application Document APP-496**]. The Applicant has concluded that the Project is in accordance with relevant policies in the NPSNN. Nonetheless, the Applicant understands the importance of its statutory obligations as the strategic highways authority and continues to collaborate through ongoing engagement with relevant local highways authorities to support the development of their local plans, manage the strategic road network (SRN), and manage the interfaces with the local road network in their areas. Overall, while there would be some additional localised traffic impacts on the wider network once the Project is operational, the net benefits to the safe and efficient operation of the road network as a whole are considered to outweigh these localised impacts.
Comments expressing concern that the Project's environmental, property and social impacts during construction and operation would outweigh its benefits.	Chapter 1 of the ES [**Application Document APP-139**] summarises the key national and local policy documents relevant to the environmental assessment of the Project. The relevant policies within these plans are further discussed in Chapter 7 of the Planning Statement [**Application Document APP-495**] and in Appendix C to the Planning Statement [**Application Document APP-498**]. In addition, each chapter of the ES identifies the relevant legislation and policy in a separate appendix. Chapter 3 of the Need for the Project [**Application Document APP-494**] identifies the strategic need for the Project in national, regional and local level policy documents. Chapter 6 of the Planning Statement [**Application Document APP-495**] assesses the potential benefits and adverse effects of both the construction and operation of the Project to demonstrate accordance with National Policy Statements (NPSs) for National Networks and Energy. Chapter 7 gives consideration to a number of 'other matters' including the NPS for Ports, the National Planning Policy Framework and local development plan policy. Chapter 8 describes the planning balance, which weighs in detail the adverse impacts against the benefits of the Project. It concludes at paragraph 8.7.34 that: '*In light of all of the above, it is the Applicant's view that there is a clear, overriding and compelling case in the public interest for the Project. Accordingly, the policy presumption in favour of the Project and the overall*

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	planning balance lie strongly in favour of the grant of development consent.'
Comments expressing concern that the Project has not considered alternative modes of transport, including a bridge, ferry, tram or rail link, greener and more accessible modes such as cycling	Section 5.3 of Chapter 5 of the Planning Statement [**Application Document APP-495**] explains how the Project has considered alternative modes of transport in its development. It concludes at paragraph 5.3.23 that '*the need for the Project, stemming from existing congestion at the Dartford Crossing, cannot be resolved by provision of a new rail crossing, provision of a ferry service, or provision of active travel measures. While road-based public transport may be a contributory element to the solution, this is not achievable without the provision of a new road crossing.*' This conclusion reflects the assessment carried out by the DfT in 2009, which found that, accounting for both passenger and freight provision, the inclusion of rail infrastructure within the Project would not provide value for money. In 2022, the Applicant reviewed this assessment against current planning policy and considers that this conclusion remains valid. **Walking, cycling and horse riding** The Project makes considerable additional provision for new accessible transport measures in terms of walkers, cyclists and horse riders as identified at paragraph 7.5.40 of the Health and Equalities Impact Assessment [**Application Document APP-539**]. The overall conclusion is that the Applicant has taken a robust and comprehensive approach to the assessment of alternatives, which accords with the requirements of paragraphs 3.3, 4.26 and 4.27 of the NPSNN. The preferred option, which is the subject of this DCO application, represents the optimal solution and the only reasonable alternative to deliver the Scheme Objectives and meet the need for the Project.
Comments expressing concern that the Project would not deliver value for money, would not be delivered on time, nor within budget.	The Project is intended to maximise national and local benefits and provide value for money for taxpayers. Achieving value for money is one of the Scheme Objectives and a Value for Money (VfM) assessment has been carried out. As detailed in the Need for the Project [**Application Document APP-494**] it represents positive value for money as the substantial benefits of the Project outweigh the costs. The Economic Appraisal Report (EAR) within Appendix D: Economic Appraisal Package of the Combined Modelling and Appraisal Report (ComMA) [**Application Document APP-526**] describes the methodologies used to appraise the economic, environmental, social benefits, disbenefits, revenues and costs of the Project and presents the appraisal results. The appraisal informs the Project's VfM assessment. The appraisal, which uses outputs from the Lower Thames Area Model (LTAM) transport model, aligns with the principles in HM Treasury Green Book (HM Treasury, 2022) and is based on the methodologies in the DfT's Transport Analysis Guidance (TAG).

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern that the costs of the Project could be spent upgrading existing roads in this region or on other transport projects.	The Scheme Objectives are recorded in the Need for the Project [**Application Document APP-494**]; these were agreed between the Applicant and DfT, and include the requirement to relieve the congested Dartford Crossing and its approach roads. Strategic development of national transport infrastructure, including road projects, is the responsibility of DfT. The Government's latest proposals for upgrading the road network confirm the objectives of the Lower Thames Crossing project in the Government's Road Investment Strategy 2: 2020 to 2025 (RIS 2).
Comments expressing concern that the Project would not facilitate or support economic development and growth.	The Project would support sustainable local development and regional economic growth in the long term by providing improved journey times and relieving congestion on the Dartford Crossing and approach roads. Through these improvements, the Project would also benefit leisure and business travellers by providing quicker, more reliable journey times locally, regionally and nationally. This would help meet the demands of future traffic growth east of London (see the Combined Modelling and Appraisal Report – Appendix C – Transport Forecasting Package [**Application Document APP-522**] and Appendix D – Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**]). These improvements would make the local area and the South East more attractive for businesses to locate and contribute to the promotion of a competitive local economy. The Project would also boost business productivity and open up opportunities for local economic growth. The enhanced connectivity would enable businesses to benefit from knowledge and technology synergies and a deeper understanding of business and labour markets, which would help strengthen local skills. The Project would also provide scope for delivering more transformational benefits for the local economy by unlocking cross-river trading opportunities that would strengthen competition and enhance business productivity. With more certainty over journey times and commuting costs in the Lower Thames area, firms and workers would both be more willing to look further afield for business and employment opportunities across the river. For example, reductions in commuting journey time and cost would increase labour supply and the propensity for employers to hire people who live on the 'other side of the Thames'. These changes are likely to encourage the development of a large and more competitive single market in the Lower Thames area, spanning both sides of the river.
Comments expressing concern that the need for the Project is not justified because it would increase greenhouse gas (GHG) emissions and have	The Planning Statement's Appendix I – Carbon Strategy and Policy [**Application Document APP-504**] sets out the Applicant's approach to carbon within the DCO application, and demonstrates its alignment with policy. It explains how the Project represents a step change in approach for a road scheme of this scale, in terms of the scope and nature of the measures which the Applicant is committing to deliver to reduce emissions

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
negative impacts on the climate.	during the construction and operation of the new road. Together with the policies which the Government has set out in its Decarbonising Transport Plan (Department for Transport, 2021a), these measures ensure that the Project is aligned with a trajectory to net zero and that the Project's emissions would not therefore be significant, in accordance with relevant guidance. The Applicant has assessed the potential climate impacts of the Project. ES Chapter 15: Climate [**Application Document APP-153**] presents the assessment of the likely significant effects on climate from GHG emissions and the vulnerability of the Project to climate change during the construction and operational phases. This assessment has been undertaken in accordance with relevant legislation and having regard to national and local plans and policies. ES Appendix 15.1: Climate Legislation and Policy [**Application Document APP-480**] sets out how the Applicant has considered and addressed those policies in the NPSs that relate to the assessment of effects considered in Chapter 15 of the ES. Policies in the NPSs that relate to decision-making in relation to matters of relevance to this topic of the ES are addressed in the Planning Statement [**Application Document APP-495**]. The Applicant proposes mitigation measures, including those that are secured through the Carbon and Energy Management Plan [**Application Document APP-552**]. During construction, GHG emissions would be minimised through the design of the Project, such as incorporating low-emission materials, using those materials efficiently, reducing the distance they would be transported, using zero-carbon energy sources, and reducing and beneficially reusing waste. By incorporating these measures into the Project's proposals, the Applicant has already reduced emissions during construction by over a third compared with a scenario where those measures were not implemented. This represents a leading position in the industry today and would result in construction emissions equivalent to 1.76 million tonnes of carbon dioxide. The Applicant has considered the additional carbon emissions from road users that could result from operation of the Project over a 60-year period and presented this information in ES Chapter 15: Climate [**Application Document APP-153**]. The Government has published its plans to deliver the required Net Zero trajectory for transport in the Decarbonising Transport Plan (Department for Transport, 2021a). The Applicant has assessed that if the trajectories set out in the plan are achieved, it would lead to a reduction in the additional road-user emissions attributable to the Project of at least 76%, across the 60-year appraisal period, compared with the more conservative figure that results from the use of national projections included in the current version of Defra's Emissions Factors Toolkit.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	The assessment concludes that the increase in GHG emissions resulting from the Project would not have a material impact on the ability of Government to meet its carbon reduction targets, in accordance with the policy test set out in the National Policy Statement for National Networks (Department for Transport, 2014).

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3.4 Planning Statement and Policy

Introduction

3.4.1 A total of 72 of the IPs with whom the Applicant does not have an SoCG raised issues related to the Planning Statement and Policy in their RRs.

3.4.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-139 6.1 Environmental Statement – Chapter 1 – Introduction

b. APP-141 6.1 Environmental Statement – Chapter 3 – Assessment of Reasonable Alternatives

c. APP-143 6.1 Environmental Statement – Chapter 5 – Air Quality

d. APP-146 6.1 Environmental Statement – Chapter 8 – Terrestrial Biodiversity

e. APP-148 6.1 Environmental Statement – Chapter 10 – Geology and Soils

f. APP-151 6.1 Environmental Statement – Chapter 13 – Population and Human Health

g. APP-153 6.1 Environmental Statement – Chapter 15 – Climate

h. APP-154 6.1 Environmental Statement – Chapter 16 – Cumulative Effects Assessment

i. APP-155 6.1 Environmental Statement – Chapter 17 – Summary

j. APP-336 6.3 Environmental Statement – Appendix 2.2 – Code of Construction Practice, First Iteration of Environmental Management Plan

k. APP-350 6.3 Environmental Statement - Appendix 5.6 - Project Air Quality Action Plan

l. APP-403 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (1 of 4)

m. APP-404 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (2 of 4)

n. APP-405 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (3 of 4)

o. APP-406 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (4 of 4)

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p. APP-425 6.3 Environmental Statement – Appendix 10.4 – Agricultural Land Classification Factual Report

q. APP-451 6.3 Environmental Statement – Appendix 13.1 – Population and Human Health Legislation and Policy

r. APP-480 6.3 Environmental Statement – Appendix 15.1 – Climate Legislation and Policy

s. APP-490 6.7 Outline Landscape and Ecology Management Plan

t. APP-494 7.1 Need for the Project

u. APP-495 7.2 Planning Statement

v. APP-496 7.2 Planning Statement – Appendix A – National Policy Statement for National Networks (NPSNN) Accordance Table

w. APP-497 7.2 Planning Statement – Appendix B – National Policy Statements for Energy Infrastructure Accordance Tables

x. APP-498 7.2 Planning Statement – Appendix C – Local Authority Policy Review

y. APP-499 7.2 Planning Statement – Appendix D – Open Space

z. APP-500 7.2 Planning Statement – Appendix E – Green Belt

aa. APP-501 7.2 Planning Statement – Appendix F – Kent Downs Area of Outstanding Natural Beauty

bb. APP-502 7.2 Planning Statement – Appendix G – Private Recreational Facilities

cc. APP-503 7.2 Planning Statement – Appendix H – Green Infrastructure Study

dd. APP-504 7.2 Planning Statement – Appendix I – Carbon Strategy and Policy Alignment

ee. APP-506 7.4 Project Design Report – Part A – Introduction and Project Background

ff. APP-507 7.4 Project Design Report – Part B – Policy Context and Project Design Process

gg. APP-508 7.4 Project Design Report – Part C – Design Rationale

hh. APP-509 7.4 Project Design Report – Part D – General Design South of the River

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ii. APP-510 7.4 Project Design Report – Part D – General Design North of the River – North of the A13 Junction to the M25

jj. APP-511 7.4 Project Design Report – Part D – General Design North of the River – Tilbury to the A13 Junction

kk. APP-512 7.4 Project Design Report – Part E – Design for Walkers, Cyclists and Horse Riders

ll. APP-513 7.4 Project Design Report – Part F – Structures and Architecture

mm. APP-514 7.4 Project Design Report – Part G – Design Evolution

nn. APP-515 7.4 Project Design Report – Part H – References and Appendices

oo. APP-518 7.7 Combined Modelling and Appraisal Report

pp. APP-519 7.7 Combined Modelling and Appraisal Report – Appendix A – Transport Data Package

qq. APP-520 7.7 Combined Modelling and Appraisal report – Appendix B – Transport Model Package

rr. APP-526 7.7 Combined Modelling and Appraisal Report – Appendix D – Economic Appraisal Package: Economic Appraisal Report

ss. APP-529 7.9 Transport Assessment

tt. APP-545 7.12 Wider Network Impacts Management and Monitoring Plan

uu. APP-547 7.14 Outline Traffic Management Plan for Construction

vv. APP-552 7.19 Carbon and Energy Management Plan

ww. APP-554 7.21 Stakeholder Actions and Commitments Register

xx. AS-038 3.1 Draft Development Consent Order

Table 3.3 Summary of issues raised in RRs concerning the Planning Statement and Policy, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Claims that the Project is not compliant with parts of the NPSs or the DfT's appraisal guidance.	The Planning Statement [**Application Document APP-495**] is the primary reference document for the assessment of the Project against the relevant planning policy and legislative framework, including the National Policy Statements. The analysis of NPS accordance in the Planning Statement demonstrates that the Project is compliant with the NPS and relevant planning policy. The analysis establishes that the proposed development would not cause any unacceptable

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	adverse effects that, considered individually, cumulatively or as a whole, would mean the decision-maker should refuse the Application and, moreover, that each aspect of the proposals is acceptable in planning terms when considered against the relevant national and local policies. **DfT appraisal guidance** To assess the performance of the Project, the Applicant created a simulation of the transport system in the Lower Thames area, called the LTAM. The transport model contains a detailed representation of the road network in the area and information on where people travelled to and from in an average month (March 2016) and uses an industry-recognised method of predicting future traffic flows and conditions. The DfT has issued Transport Analysis Guidance (TAG) on how transport models such as this should be built, and the extent to which the predictions can be compared to actual conditions. The TAG was the basis for collecting data, building the model, and assessing its performance. Full details of the processes and checks carried out are in Appendix A – Transport Data Package [**Application Document APP-519**] and Appendix B – Transport Model Package [**Application Document APP-520**] of the Combined Modelling and Appraisal Report. An independent specialist assessor within National Highways concluded that the LTAM is suitable to assess the Project. In accordance with paragraph 4.5 of the NPSNN, the Applicant has developed an outline business case for the Project which aligns with HM Treasury's (2018) Green Book and the DfT's Business Case and TAG guidance. This business case has been shared with DfT. The Economic Appraisal Report is presented in the Combined Modelling and Appraisal Report – Appendix D – Economic Appraisal Package: Economic Appraisal Report [**Application Document APP-526**].
Comments expressing concern that the proposed mitigation is not sufficient to ensure the Project is policy-compliant where severe permanent effects are predicted.	Actions have been taken when developing the Project to avoid and minimise negative social and environmental impacts through careful design, including embedded mitigation secured under Requirement 3 of the draft DCO [**Additional Submission AS-038**] and essential mitigation under the Register of Environmental Actions and Commitments, which forms part of ES Appendix 2.2: CoCP [**Application Document APP-336**]. The Control Plan, Plate 2.1 in the outline Landscape and Ecology Management Plan (oLEMP) [**Application Document APP-490**], sets out how all the requirements in Schedule 2 of the draft DCO and control documents work together to manage the delivery of the Project in accordance with the application. Further controls are set out elsewhere in the CoCP, in the outline Traffic Management Plan for Construction [**Application Document APP-547**] and in the Stakeholder Actions and Commitments Register [**Application Document APP-554**].

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	The Project alignment was chosen to balance air quality, noise and visual effects, avoid heritage assets, and avoid impacts to the Thames Estuary and Marshes Ramsar site and Thames Estuary and Marshes Special Protection Area (SPA). Further refinements resulted in the provision of environmental mitigation, compensation and enhancement measures, such as habitat creation, landscaping and Public Rights of Way, the narrowing of the M2/A2 corridor through the Kent Downs Area of Outstanding Natural Beauty (AONB) and Shorne Woods Country Park, the provision of new planting and green bridges, and the introduction of nitrogen deposition compensation sites within the Order Limits. Development of the Project's design is set out in the Project Design Report [**Application Documents APP-506 to APP-515**]. Where it has not been possible to mitigate impacts, compensatory measures are proposed. However, it is noted that there would be residual adverse impacts. The relevant planning policy principles are assessed in Chapter 6 and Appendix A of the Planning Statement [**Application Documents APP-495 and APP-496**], which demonstrates accordance with, for example, paragraph 3.3 of the NPSNN. Local planning policies are assessed in Chapter 7 and Appendix C of the Planning Statement [**Application Documents APP-495 and APP-498**]. An Environmental Impact Assessment (EIA) of the Project assesses its likely significant environmental effects and presents the proposed mitigation, including the measures referred to above. The residual significant environmental effects of the Project (following mitigation) are identified in each topic chapter in the ES and summarised in ES Chapter 17: Summary [**Application Document APP-155**]. Chapter 6 of the Planning Statement [**Application Document APP-495**] provides an assessment of the potential adverse effects of the Project set against the assessment principles and generic impacts assessment in the NPSNN, the relevant Energy NPSs, and other national and local policy where relevant.
Concerns that the Project could conflict with Government policy such as reducing road traffic in order to meet emissions targets, improving air quality, achieving net zero, or in relation to nitrogen deposition.	Opportunities taken to reduce carbon emissions are discussed in the Carbon and Energy Management Plan [**Application Document APP-552**] and ES Chapter 15: Climate [**Application Document APP-153**]. It is also addressed in Appendix I: Carbon Strategy and Policy Alignment of the Planning Statement [**Application Document APP-504**], which sets out the low-carbon innovation and approaches that would be used in the Project to explore how the Applicant can reach its target of achieving carbon-neutral construction by 2040 and help the UK reach net zero by 2050. Appendix I explains how the Project represents a step-change in approach for a road project of this scale, in terms of the scope and nature of the measures that the Applicant is committing to deliver to reduce emissions during the Project's construction and operation. Together with the policies which the Government has set out in its Decarbonising Transport Plan

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	(Department for Transport, 2021a), these measures ensure that the Project is aligned with a trajectory to net zero and that the Project's emissions would not therefore be significant, in accordance with relevant guidance. The air quality assessment for the Project is presented within ES Chapter 5: Air Quality [**Application Document APP-143**]. The impact of the Project on human receptors from air quality is not considered to be significant, and the Project is not predicted to affect the UK's reported ability to comply with the Air Quality Directive. The Project would not prevent the move to a low-carbon economy. The Government's Transport Decarbonisation Plan sets out the approach to be adopted to deliver 'net zero'. This requires electrification of private vehicles and the development of an alternative fuel approach for Heavy Goods Vehicles (HGVs), such as hydrogen, battery and/or overhead gantries. Any new technologies brought forward to achieve these goals will need to be compatible with the existing road network and, therefore, with the Project's design, which conforms to the latest standards. The assessment of nitrogen deposition impacts on designated sites and habitats is contained within ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] and ES Appendix 8.14: Designated Sites Air Quality Assessment [**Application Documents APP-403 to APP-406**]. The Project would have a significant air quality effect on a number of designated sites and habitats as a result of an increase in nitrogen deposition. Compensation is provided in the form of the creation of new areas of planting and habitat creation, which are set out in ES Appendix 5.6: Project Air Quality Action Plan [**Application Document APP-350**].
Concerns that the Project would impact too much agricultural land, including Grade 1 land, with the resulting potential impact on food security, increased 'food miles', the environment and the economy, as well as on land earmarked for future growth, at a time of food shortages and rising prices.	The NPSNN and NPS EN-1 set out that Applicants should recognise the importance of the Best and Most Versatile (BMV) (Grades 1, 2 and 3a) land and to prioritise the use of areas of poorer quality. To address the policies in the NPSNN and NPS EN-1, ES Chapter 10: Geology and Soils [**Application Document APP-148**] presents an assessment of likely significant effects on soil resources and BMV land. ES Appendix 10.4: Agricultural Land Classification Factual Report [**Application Document APP-425**] presents the outputs of the survey and has informed the baseline of ES Chapter 10. Land considered to be BMV agricultural land makes up approximately 55% of the land needed for the Project to the south of the River Thames and approximately 25% to the north. It should be noted, however, that over half of the BMV land within the Order Limits is within the lowest BMV land category (Grade 3a), with only a very small proportion (approximately 3%) within the highest BMV land category (Grade 1). This is set out in

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	paragraphs 6.5.278 to 6.5.288 of the Planning Statement [**Application Document APP-495**]. The Applicant has taken reasonable and practicable steps to minimise and mitigate for the likely significant effects. The design has been optimised to minimise the land take required to construct and operate the Project. The route optioneering phase and design development considered the presence of higher-quality agricultural land alongside other environmental and design constraints. Where agricultural land cannot be avoided, soil management measures to minimise the adverse effects of soil disturbance and handling during the construction phase are described in ES Chapter 10: Geology and Soils [**Application Document APP-148**] and secured through their inclusion in the REAC, which forms part of the CoCP [**Application Document APP-336**]. In ES Chapter 13: Population and Human Health [**Application Document APP-151**], the Applicant assesses the impact of the Project on agricultural landholdings. Agricultural land is affected at the point it is taken out of agricultural use, namely at the start of the construction phase. ES Chapter 13 [**Application Document APP-151**] identifies significant adverse effects in relation to a number of landholdings to the south and north of the River Thames. Information about compensation offered to eligible owners and occupiers of agricultural land affected by the Project can be found in Compulsory Purchase and Compensation: guide 3 – Compensation to Agricultural Owners and Occupiers (Department for Levelling Up, Housing and Communities, 2021b).
Comments expressing concern about the loss of Green Belt land and the potential development of new housing, industry, and other uses on Green Belt land. There were also concerns that the Project may be in conflict with national and local planning policy and that Metropolitan London Green Belt designated land is irreplaceable. There were concerns whether there are very special circumstances to justify the Project's impact on Green Belt land.	With the exception of the tunnel across the River Thames, the Project lies wholly within designated Green Belt. The Applicant acknowledges that the Project, when taken as a whole, is inappropriate development in the Green Belt and therefore as per paragraph 5.178 of the NPSNN, the Secretary of State will need to assess whether there are very special circumstances to justify inappropriate development in the Green Belt. As described in detail in Appendix E [**Application Document APP-500**] of the Planning Statement, it is considered that very special circumstances exist for the Project. There is a clear and overriding need for the Project and there are substantial benefits as a result of the Project which are in the public interest. The need and benefits of the Project and lack of alternatives are considerable and outweigh any potential harm to the Green Belt or any other harm that may be caused by the Project.
Comments expressing concern that the Project may impact the delivery of	The Project has undergone a thorough assessment of route alternatives, which is presented in ES Chapter 3: Assessment of Reasonable Alternatives [**Application Document APP-141**] and

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
proposed housing on land to the north of South Ockendon, as well as planned growth around the Dartford Crossing, East Tilbury and Linford, and that housing prices would be affected. There were questions asked about the Project's implications for emerging plans and development frameworks, and a suggestion that the Applicant should have carried out a strategic master-planning exercise.	Chapter 5: Project Evolution and Alternatives of the Planning Statement [**Application Document APP-495**]. The assessment of route alternatives has taken into consideration impacts on 'local development plans' and 'planned development' alongside other constraints. The proposed design represents a sustainable solution to the need for the Project (as described in the Need for the Project [**Application Document APP-494**]) that meets operational requirements. ES Chapter 13: Population and Human Health [**Application Document APP-151**] provides an assessment of the Project impacts on residential development land: sites or proposals identified in national or local plans, policies or strategies for development, or land subject to planning permission. Planning Statement Appendix C – Local Authority Policy Review [**Application Document APP-498**] provides an assessment of the Project against adopted and emerging local plan policies, including allocations. Chapter 7 of the Planning Statement [**Application Document APP-495**] sets out the identification and assessment of the Project's alignment and conformity with other matters that are potentially important and relevant, including national policy, local plan policies and allocations, and consideration of emerging local plan policy where appropriate. Chapter 7 identifies where the policies explicitly support the development of the Project.

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3.5 Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives

Introduction

3.5.1 A total of 136 of the IPs with whom the Applicant does not have an SoCG raised issues in their RRs related to Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives.

3.5.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-141 6.1 Environmental Statement Chapter 3 – Assessment of Reasonable Alternatives

b. APP-494 7.1 Need for the Project

c. APP-495 7.2 Planning Statement (Chapter 5 – Project Evolution & Alternatives)

d. APP-506 7.4 Project Design Report – Part A – Introduction and Project Background

e. APP-512 7.4 Project Design Report – Part E – Design for Walkers, Cyclists and Horse Riders

f. APP-522 7.7 Combined Modelling and Appraisal Report – Appendix C – Transport Forecasting Package

g. APP-528 7.8 Traffic Forecasts Non-Technical Summary

h. APP-529 7.9 Transport Assessment

i. APP-545 7.12 Wider Network Impacts Management and Monitoring Plan

Table 3.4 Summary of issues raised in RRs concerning Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern that the selected route for the Project would increase congestion in local roads and the nearby major road network.	The forecast changes to traffic flows are presented in Appendix C – Transport Forecasting Package of the Combined Modelling and Appraisal Report [**Application Document APP-522**]. Traffic modelling submitted as part of the Application shows that, compared with the situation without the new road crossing, the overall level of traffic using the Dartford Crossing is forecast to fall by an average of 19% in 2030 during the peak hours and remain below current levels for the foreseeable future. Average speeds

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	on that part of the network would rise and journey times would become more reliable. In addition, the Project is forecast to result in reductions in traffic on some parts of the SRN and some local roads. While there would be negative impacts on traffic flow in some locations, the Applicant considers that no additional interventions are necessary beyond the proposals presented in the Application. Overall, the transport benefits of the Project clearly and significantly outweigh the negative impacts on the road network, with the Project fulfilling the Scheme Objective to relieve the congested Dartford Crossing, outlined in the Need for the Project [**Application Document APP-494**]. The Applicant proposes to monitor the impacts of the Project on traffic on the local and strategic road networks as set out in the WNIMMP [**Application Document** [**Application Document APP-545**]. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case-making through existing funding mechanisms and processes. The Applicant is obligated to work with local highway authorities and others to align national and local plans and investments, balance national and local needs, and support better end-to-end journeys for road users (paragraph 5.19 of Highways England: Licence (Department for Transport, 2015a)). More information on the predicted traffic impacts during construction and operation is available in the Transport Assessment [**Application Document APP-529**].
Comments expressing concern that a major new road crossing is an inappropriate solution to the region's transport needs, especially given perceived changes in road trips since the pandemic, as well as environmental concerns. Some comments called for the Project to facilitate forms of transport other than private motor traffic, such as passenger and freight rail and buses, trams, cycles, pedestrian routes or ferries.	The Applicant has considered reasonable alternatives to the Project, including modal alternatives which are detailed in ES Chapter 3: Assessment of Reasonable Alternatives [**Application Document APP-141**]. An assessment carried out by the DfT in 2009 found that the inclusion of rail infrastructure within the Project would not provide value for money. This assessment was reviewed in 2022 and is still considered applicable. For more information, see Section 5.3 of the Planning Statement [**Application Document APP-495**]. The Applicant considered walker, cyclist, and horse rider road-based and ferry-based public transport options. The conclusion is that these modes would not provide an alternative to a road crossing because they would not provide adequate capacity. The Applicant has considered various options during the development of the Project to provide improved river crossings for walkers and cyclists. All the river crossing options investigated for walkers and cyclists have been rejected for reasons including lack of technical feasibility, operational issues, lack of commercial viability, cost, environmental impacts and impacts on safety. A walking and cycling shuttle is not considered viable due to low latent demand and uncompetitive journey times.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	For more information about the proposed walkers, cyclists, and horse riders (WCH) routes, see the Project Design Report – Part E – Design for Walkers, Cyclists and Horse Riders [**Application Document APP-512**]. The Project would be available to public transport operators for buses and coaches, while it would also improve access to some railway stations. The existing ferry across the River Thames between Gravesend and Tilbury would not be affected by the Project.
Comments expressing concern about connections to the SRN, including direct links that have not been included such as to the A127, the M25 junctions 29 and 30, and the M20.	Detailed information about the decision-making process that led to the identification of the preferred route are included within Section 5.4 of the Planning Statement [**Application Document APP-495**]. The subsequent design development and refinement is discussed in the Project Design Report [**Application Document APP-506**]. The Project would include junctions with key parts of the SRN, namely the A2/M2, A13/A1089 and M25. It would also provide connections to a limited number of local roads. The changes to the road network where the Project and the M25 meet are designed to maintain safety and promote free-flowing traffic, and to increase the capacity of junction 29. The layout of the junctions has been designed to ensure the safe management of traffic, while also providing local access to the A127. The desire to provide more local connections to and from the Project must be balanced against the need to ensure free-flowing connections with the SRN and safety for all road users. Other considerations are increased traffic on local roads arising from additional connections and increased environmental effects associated with large junctions. Where direct local connections are not provided, it is generally possible to connect to the Project by first joining roads on the SRN that are served by the proposed junctions. The Applicant carried out thorough investigations into different junction locations and route alignments and found the current version of the Project to be the one that best satisfies the Scheme Objectives, following consultation on and further investigations into the connection points. An improved link to the M20 has been the subject of previous consideration. The 'C variant' option of the Project, which would have widened the A229 between the M2 and M20, was not taken forward due to high costs, environmental impacts, issues with connectivity to the Dartford Crossing, and failure to meet the Scheme Objectives.
Comments expressing concern about the location of the Project's crossing, and suggesting alternative alignments. There was concern that proper	During the development of the Project, the Applicant and DfT considered various options carefully with regards to how each would contribute towards the Scheme Objectives agreed with DfT. The Scheme Objectives are set out in the Need for the Project [**Application Document APP-494**]. Public consultations have

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
consideration of alternatives has not been carried out.	been carried out at appropriate points during the Project's development. The Applicant has considered reasonable route alternatives to the Project, and these are detailed in ES Chapter 3: Assessment of Reasonable Alternatives [**Application Document APP-141**]. More information about the decision-making process that led to the identification of the preferred route can be found in Section 5.4 of the Planning Statement [**Application Document APP-495**], with information about the subsequent design development in the Project Design Report [**Application Document APP-506**].

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3.6 Consultation and Engagement

Introduction

3.6.1 A total of 136 of the IPs with whom the Applicant does not have an SoCG raised issues in their RRs related to Consultation and Engagement.

3.6.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. AoC-001 Adequacy of Consultation Representation - Ashford Borough Council

b. AoC-002 Adequacy of Consultation Representation - Basildon Council

c. AoC-003 Adequacy of Consultation Representation - Brentwood Borough Council

d. AoC-004 Adequacy of Consultation Representation - Chelmsford City Council

e. AoC-005 Adequacy of Consultation Representation - Dartford Borough Council

f. AoC-006 Adequacy of Consultation Representation - Essex County Council

g. AoC-007 Adequacy of Consultation Representation - Gravesham Borough Council

h. AoC-008 Adequacy of Consultation Representation - Hertfordshire County Council

i. AoC-009 Adequacy of Consultation Representation - Kent County Council

j. AoC-010 Adequacy of Consultation Representation - London Borough of Havering

k. AoC-011 Adequacy of Consultation Representation - London Borough of Redbridge

l. AoC-012 Adequacy of Consultation Representation - Maidstone Borough Council

m. AoC-013 Adequacy of Consultation Representation - Medway Council

n. AoC-014 Adequacy of Consultation Representation - Sevenoaks District Council

o. AoC-015 Adequacy of Consultation Representation - Southend-on-Sea City Council

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p. AoC-016 Adequacy of Consultation Representation - Suffolk County Council

q. AoC-017 Adequacy of Consultation Representation - Surrey County Council

r. AoC-018 Adequacy of Consultation Representation - Thurrock Council

s. AoC-019 Adequacy of Consultation Representation - Tonbridge & Malling Borough Council

t. APP-064 5.1 Consultation Report – Part 1 of 6

u. APP-065 5.1 Consultation Report – Part 2 of 6

v. APP-066 5.1 Consultation Report – Part 3 of 6

w. APP-067 5.1 Consultation Report – Part 4 of 6

x. APP-068 5.1 Consultation Report – Part 5 of 6

y. APP-069 5.1 Consultation Report – Part 6 of 6

z. APP-070 5.1 Consultation Report – Appendix A – Compliance checklist

aa. APP-071 5.1 Consultation Report – Appendix B – Copies of non-statutory consultation material

bb. APP-072 5.1 Consultation Report – Appendix C – The Infrastructure Planning (EIA) Regulations 2017 Regulation 8(1) letter to the Planning Inspectorate and acknowledgement

cc. APP-073 5.1 Consultation Report – Appendix D – Copy of the draft Statement of Community Consultation provided to local authorities

dd. APP-074 5.1 Consultation Report – Appendix E – Letter to local authorities beginning consultation on the Statement of Community Consultation

ee. APP-075 5.1 Consultation Report – Appendix F – Responses from local authorities on the draft Statement of Community Consultation and an explanation of how National Highways had regard to those responses

ff. APP-076 5.1 Consultation Report – Appendix G – Published Statement of Community Consultation and compliance checklist

gg. APP-077 5.1 Consultation Report – Appendix H – List of prescribed consultees identified and consulted

hh. APP-078 5.1 Consultation Report – Appendix I – List of all respondents to statutory consultation

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ii. APP-079 5.1 Consultation Report – Appendix J – List of persons with an interest in land consulted under section 42 and records of undeliverable section 42(1)(d) mail

jj. APP-080 5.1 Consultation Report – Appendix K – S42 Letters and enclosures

kk. APP-081 5.1 Consultation Report – Appendix L – S46 Letter sent to the Planning Inspectorate and their letter of acknowledgement

ll. APP-082 5.1 Consultation Report – Appendix M – Statutory consultation material

mm. APP-083 5.1 Consultation Report – Appendix N – Section 47 and section 48 newspaper notices

nn. APP-084 5.1 Consultation Report – Appendix O – List of any additional consultees

oo. APP-085 5.1 Consultation Report – Appendix Q – Supplementary Consultation material

pp. APP-086 5.1 Consultation Report – Appendix R – Design refinement consultation material

qq. APP-087 5.1 Consultation Report – Appendix S – Community impacts consultation material

rr. APP-088 5.1 Consultation Report – Appendix T – Local refinement consultation material

ss. APP-089 5.1 Consultation Report – Appendix U – Traverse's summary reports of consultation responses

tt. APP-090 5.1 Consultation Report – Appendix V – Adequacy of Consultation Representations

uu. APP-091 5.2 Statement of Engagement

vv. APP-092 5.3 Statement of Commonality

ww. APP-137 5.5 Statement responding to Local Authority stated positions on Adequacy of Consultation

xx. PD-013 Rule 6 letter – notification of the preliminary meeting and matters to be discussed

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Table 3.5 Summary of issues raised in RRs concerning Consultation and Engagement, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about the Applicant's public consultations, including concerns that they had been of insufficient standard or duration, the information provided was misleading or lacked detail, the events were poorly scheduled or located, consultation feedback was misrepresented or not considered, responses were overlooked in favour of economically powerful stakeholders, or that the outcome of the consultations was pre-determined.	The Applicant's Consultation Report [**Application Documents APP-064 to APP-069**] and its appendices [**Application Documents APP-070 to APP-090**] provides a detailed account of pre-application consultation, including the statutory consultation undertaken in 2018 and all subsequent phases of consultation undertaken on a non-statutory basis. The report includes descriptions of the way in which each consultation was carried out, including the materials that were produced and the variety of ways in which it was possible for consultees to engage with the proposals, such as in-person events, virtual events and telephone surgeries. Also included in the report are descriptions and supplementary evidence of the process followed by the Applicant involving relevant local authorities in the planning of each new phase of consultation. The purpose of these exercises was to ensure that local authorities were in a position to effectively scrutinise the planned activities and offer advice to ensure that each consultation met the needs of affected communities. Chapters 11 to 15 of the Consultation Report [**Application Documents APP-065 to APP-069**] set out the range of issues raised by consultees to each phase of consultation and the Applicant's consideration of each point. This process involved the full range of technical teams working on the Project, who considered issues that were relevant to their specialisms and decided whether changes should be made to the proposals. Relevant local authorities were asked to review the Applicant's Consultation Report and to provide the Planning Inspectorate with Adequacy of Consultation Representations [**AoC-001 to AoC-019**]. Having considered the local authorities' feedback and carried out its own review of the Consultation Report, the Planning Inspectorate concluded that the Applicant had provided sufficient evidence that pre-application consultation had been carried out to the required standard. The Planning Inspectorate, in accepting the Application for development consent in November 2022, stated that the Applicant has complied with Chapter 2 of Part 5 of the Planning Act 2008, including carrying out the necessary pre-application consultation with stakeholders, land interests and the public.
Comments expressing concern as to whether consultation and engagement meaningfully informed the Project's WCH proposals.	Throughout the design process, the strategy for providing improvements for Walking, Cycling and Horse Riding (WCH) has been developed, taking onboard comments received through the statutory and formal consultation process. In parallel with the development of the Statutory Consultation design, a Walking, Cycling and Horse Riding Assessment (WCHAR) was carried out. This explored the existing PRoW network, national and local policies, local demographics,

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	existing/future trip attractors, commuter routes, and consultation feedback to determine where there might be strategic opportunities for Walkers, Cyclists and Horse-riders. As part of this process key stakeholders, including Local Councils and interest groups such as Sustrans, The Ramblers, and British Horse Society, were consulted. The Applicant delivered a walking cycling and horse riding (WCH) webinar in late 2021, which key stakeholders and local interest groups were invited to attend. During the webinar, the Applicant provided further details of the proposed WCH routes, which included which user types could use them and what changes had been introduced at the Design Refinement Consultation in July 2020 as a result of feedback on the design received during the Supplementary Consultation in January 2020.

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3.7 Land and Compulsory Acquisition

Introduction

3.7.1 A total of 93 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic Land and Compulsory Acquisition.

3.7.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-061 4.1 Statement of Reasons – Annex C – Land Referencing Methodology

b. APP-061 4.1 Statement of Reasons – Annex C – Land Referencing Methodology

c. APP-061 4.1 Statement of Reasons – Annex C – Land Referencing Methodology

d. APP-063 4.3 Funding Statement

e. APP-064 5.1 Consultation Report – Part 1 of 6

f. APP-350 6.3 Environmental Statement - Appendix 5.6 - Project Air Quality Action Plan

g. AS-006 2.2 Land Plans – (Volume A) – (Key Plan)

h. AS-008 2.2 Land Plans – Volume B – (Sheets 1 to 20 of 49)

i. AS-010 2.2 Land Plans – Volume C – (Sheets 21 to 49)

j. AS-038 3.1 Draft Development Consent Order (DCO)

k. AS-040 4.1 Statement of Reasons

l. AS-042 4.2 Book of Reference

Table 3.6 Summary of issues raised in RRs concerning Land and Compulsory Acquisition, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments from those with an interest in land raising concerns and questions that are specific to their land interest and situation.	The Applicant has carefully considered the issues raised in RRs submitted by those with an interest in land. Issues raised that are specific to the person's land interest are subject to ongoing engagement and negotiations with the Applicant's specialist Land and Property team, and it is not considered appropriate for the Applicant to set out detailed responses in this report to what are often commercially sensitive and confidential discussions.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern that businesses, including farms, would be negatively affected by the Project, with some becoming unviable. Some comments said the Applicant is seeking to use too much land, which is not justified by the Project.	The Applicant has sought to minimise the land impacted or required for the Project, while ensuring that there is sufficient land to build and operate the new road. The Applicant's Statement of Reasons [**Additional Submission AS-040**] sets out the reason why each parcel of land would be required to construct and operate the Project. Where the land needed for the Project directly affects a business, the Applicant has engaged with that business to identify ways to mitigate any adverse impacts if possible. Where it is not feasible for the business to continue operating during construction or after the Project is operational, then appropriate compensation would be available in accordance with the Compensation Code.
Comments expressing concern about access to businesses, including farms, and residential properties. Concerns were mainly about the construction period, although there were also concerns about the operational Project.	The Applicant is working with all residents and businesses (including farms) that are or would be directly affected by the Project to minimise the impacts and to understand their access needs. The Applicant would expect to maintain accesses throughout construction. If there were any impacts, the Applicant would engage with affected parties and, where possible, give them advance notice about any temporary impacts on their access, However, in the case of an emergency (such as a burst pipe) the Applicant would work to neutralise any harmful impacts immediately for the benefit of all parties, even if this meant temporarily closing an access. During the Minor Refinements Consultation in May 2023, the Applicant consulted on a reduction of the nitrogen deposition compensation area and Order Limits at Blue Bell Hill and Burham. The revised proposal followed ongoing engagement with the landowner. The change reduces the impact on the farm business and the loss of productive agricultural land.
Comments expressing concern that land required temporarily by the Applicant would not be restored to a satisfactory condition once it is no longer needed.	Under article 35 of the draft DCO [**Additional Submission AS-038**], before giving up possession of land of which temporary possession has been taken to construct the Project, the Applicant would be required to restore the land to the reasonable satisfaction of the owner. This obligation is subject to the exceptions set out in article 35(6), which include the right to retain any permanent works constructed on the land, such as diverted utilities.
Comments expressing concern that those whose land interests would be directly affected by the Project would not be sufficiently compensated.	Those affected by the Project may be entitled to make a claim for compensation, in accordance with the Compensation Code. Each claim for compensation would be considered on its own merits, in line with the Code. Further information about the compensation offered to those affected by the Project can be found in Compulsory Purchase and Compensation: guide 2 – Compensation to Business Owners and Occupiers and guide 4 – Compensation to Residential Owners and Occupiers (Department for Levelling Up, Housing and Communities, 2021a; 2021c). Guide 4 includes information about compensation for when the value of someone's home has been affected by the construction or operation of the Project. The Applicant has engaged with people with an interest in land within the Order Limits and previous

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	versions of the Project's Order Limits periodically and at public consultations. This included writing to individual landowners and the business owner at each stage of the consultation process. Where the land needed for the Project directly affects a business, the Applicant has engaged with those businesses to identify ways to mitigate any adverse impacts if possible. Where it is not feasible for the business to continue operating during construction or after the new road is open, then appropriate compensation would be available, in accordance with the Compensation Code.
Comments expressing concern over a reported lack of engagement from the Applicant regarding impacts on land or property.	During the pre-application period, the Applicant consulted extensively with local people, including those with land interests. The Applicant has also engaged with people with an interest in land within the Order Limits and previous versions of the Project's Order Limits. These interactions included writing to individual landowners and business owners at each stage of the consultation process, with their feedback informing the Project's design development. Consultation and engagement activities are presented in Chapters 3 to 9 of the Consultation Report [**Application Document APP-064**]. The Planning Inspectorate, in accepting the application for development consent in November 2022, stated that the Applicant has complied with Chapter 2 of Part 5 of the Planning Act 2008, including carrying out the necessary pre-application consultation with stakeholders, land interests and the public.
Comments expressing concern about the way land interests have been categorised or depicted on the Applicant's Land Plans, including suggestions that land had been incorrectly identified or categorised.	The Applicant's Land Plans for the Project [**Application Documents APP-006, APP-007 and APP-008**] were compiled to be in accordance with the land requirements of the Project during construction and operation. A number of updates to these Application documents have been made and submitted at the discretion of the Examining Authority, with the latest Land Plans available in the Examination Library [**Additional Submissions AS-006, AS-008 and APP-010**].
Comments from those with an interest in land questioning the efficacy of the Applicant's selection criteria for acquiring land, which include land required for constructing and operating the Project, land designated as nitrogen deposition compensation and for other environmental mitigations, for recreational areas, and for new or updated WCH provision.	The Applicant has sought to minimise the land impacted or required for the Project, while ensuring that there is sufficient land to build and operate the new road. The Applicant's Statement of Reasons [**Additional Submission AS-040**] sets out the reason why each parcel of land would be required to construct and operate the Project, including whether the land would be used for environmental mitigation, WCH provision, recreational areas, or constructing or operating the new road. Where appropriate, any selection criteria used for land proposed for environmental mitigation is set out in the relevant Application documents. For example, the land that would be used to compensate for the predicted impacts of nitrogen deposition was selected according to the criteria set out in ES Appendix 5.6: Project Air Quality Action Plan [**Application Document APP-350**].

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3.8 Design of Roads, Tunnels, and Walking, Cycling and Horse Riding Provision

Introduction

3.8.1 A total of 90 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of the Design of Roads, Tunnels, and Walking, Cycling and Horse Riding Provision.

3.8.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-017 2.5 General Arrangement Plans (Volume C) (Sheets 21 to 49)

b. APP-034 2.9 Engineering Drawings and Sections (Volume E) (South Portal and Tilbury Plan and Profiles)

c. APP-035 2.9 Engineering Drawings and Sections (Volume F) (A13 Junction Plan and Profiles)

d. APP-041 2.11 Classification of Roads Plans

e. APP-042 2.12 Tunnel Area Plan

f. APP-044 2.13 Structures Plans (Volume B) (Sheets 12 to 79)

g. APP-046 2.15 Tunnel Limits of Deviation Plans

h. APP-140 6.1 Environmental Statement – Chapter 2 – Project Description

i. APP-141 6.1 Environmental Statement – Chapter 3 – Assessment of Reasonable Alternatives

j. APP-143 6.1 Environmental Statement – Chapter 5 – Air Quality

k. APP-150 6.1 Environmental Statement – Chapter 12 – Noise and Vibration

l. APP-151 6.1 Environmental Statement – Chapter 13 – Population and Human Health

m. APP-336 6.3 Environmental Statement – Appendix 2.2 – Code of Construction Practice, First Iteration of Environmental Management Plan

n. APP-495 7.2 Planning Statement

o. APP-506 7.4 Project Design Report – Part A – Introduction and Project Background

p. APP-507 7.4 Project Design Report – Part B – Policy Context and Project Design Process

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q. APP-508 7.4 Project Design Report – Part C – Design Rationale

r. APP-509 7.4 Project Design Report – Part D – General Design South of the River

s. APP-510 7.4 Project Design Report – Part D – General Design North of the River – North of the A13 Junction to the M25

t. APP-511 7.4 Project Design Report – Part D – General Design North of the River – Tilbury to the A13 Junction

u. APP-512 7.4 Project Design Report – Part E – Design for Walkers, Cyclists and Horse Riders

v. APP-513 7.4 Project Design Report – Part F – Structures and Architecture

w. APP-514 7.4 Project Design Report – Part G – Design Evolution

x. APP-515 7.4 Project Design Report – Part H – References and Appendices

y. APP-516 7.5 Design Principles

z. APP-549 7.16 Community Impact Report

aa. APP-550 7.17 Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes

bb. AS-044 6.1 Environmental Statement – Chapter 6 – Cultural Heritage

cc. AS-052 6.3 Environmental Statement – Appendix 6.10 – Assessment Tables

dd. APP-259 ES Figure 7.23 – Existing Tree Constraints Plan (1 of 2)

ee. APP-387 ES Appendix 7.12 – Arboricultural Impact Assessment (Annex E)

Table 3.7 Summary of issues raised in RRs concerning Design of Roads, Tunnels, and Walking, Cycling and Horse Riding Provision, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about the design of the Project, including the suggestion to use a bridge rather than a tunnel, concerns that the junction layouts would be confusing for drivers. Some respondents expressed concern about the design	**Tunnel crossing** As outlined in the Planning Statement [**Application Document APP-495**] and ES Chapter 3: Assessment of Reasonable Alternatives [**Application Document APP-141**], designing the crossing as a tunnel instead of a bridge reduces the environmental and community impacts because tunnels have substantially fewer visual, noise and biodiversity impacts. Tunnels are also not affected by severe weather, which can close bridges.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
of slip and connecting roads that would link the Project to the A2/M2, A13/A1089 and the M25, including junction 29. Some noted that not all connections between the Project and the SRN are proposed.	**Junction layouts** All road layouts would be designed to be safe and comfortable for motorists, with appropriate signage. The Project Design Report (PDR) [**Application Document APP-506 to APP-515**] sets out how design of the Project has been an integral part of the design development in line with the requirements of the Design Manual for Roads and Bridges (DMRB). The PDR also sets out the background to the Project, the policy context of the preliminary design approach and design rationale. The Design Principles document [**Application Document APP-516**] describes the key principles that have shaped the design development, and establishes the principles to be met in the detailed design phase, supplementing the requirements and guidance within DMRB. The Design Principles are legally secured via Requirement 3 of the draft DCO [**Additional Submission AS-038**], as well as Requirement 5. The detailed design for the Project would be carried out by the appointed Contractors in accordance with the DMRB standards and Design Principles. **Connection to the SRN** During the Project's design development phase, the Applicant has selected options and designs that have been rigorously tested against the Scheme Objectives and, at the appropriate stages, have been presented at public consultation. The Applicant has worked closely with stakeholders to understand their needs and, wherever practicable, to incorporate their feedback into the designs while still fulfilling the Scheme Objectives. Having carried out and documented this design process, the Applicant has concluded that the Project includes the optimal junction layouts in the most suitable locations. More information about the design process, including selecting links to the SRN, can be found in the Project Design Report [**Application Documents APP-506 to APP-515**].
Concern about long-term capacity of the Project to handle increases in motor traffic, including whether there should be a reduction in three lanes to two along the southbound section between the M25 and the A13.	The number of lanes along the route has been adjusted over time as part of the ongoing design development process, informed by the Applicant's traffic modelling. Traffic modelling submitted as part of the Application confirms that the Project route and its junctions would remain free-flowing for the foreseeable future. For more information about the design of the Project, see the Project Design Report [**Application Document APP-506 to APP-515**]. Information about the Applicant's traffic modelling can be found in the Traffic Forecasts Non-Technical Summary [**Application Document APP-528**].
Some consultees requested that a Tilbury Link Road be included in the Project, while there were also concerns about the viability of connections to the proposed Brentwood	**Tilbury Link Road** The Applicant is investigating the Tilbury Link Road as a separate project. For more information, see Section 5.5 of Chapter 5 of the Planning Statement [**Application Document APP-495**] and the Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes [**Application Document APP-550**].

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Enterprise Park, as well as requests for more information on the road layout for Hornsby Lane.	**Brentwood Enterprise Park** The Applicant is actively engaging with the developers of Brentwood Enterprise Park to ensure its construction can proceed with minimal disruption if and when planning permission is granted. More information about engagement with Brentwood Enterprise Park and other major developments in the vicinity of the Project can be found in the Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes document [**Application Document APP-550**]. **Hornsby Lane** The Project has sought to reduce severance of roads and Public Right of Ways (PRoWs) once the Project is operational. All roads crossing the Project would be maintained, with the exception of Hornsby Lane, which would require a section near the new route to be permanently closed. This closure would avoid having to move some overhead lines closer to properties in Chadwell St Mary. Alternative routes to Hornsby Lane would be available via the A1013 and Heath Road. An indicative layout for the highways including and around Hornsby Lane is provided in the General Arrangement Plans (Volume C) [**Application Document APP-017**].
Comments expressing concern about roads and footpaths being closed temporarily or permanently due to the Project.	For information regarding permanent stopping up of roads and Public Rights of Way (PRoWs) that do not cross the Project, see Schedule 4 of the draft DCO [**Additional Submission AS-038**]. For more information, see the Rights of Way and Access Plans [**Application Document APP-024, APP-025 and AS-032**], which identify within the Order Limits any new or altered means of access, stopping up of streets or roads or any diversions, extinguishments or creation of rights of way. The Project has sought to reduce severance of roads and PRoWs once the Project is operational. All roads crossing the Project would be maintained, with the exception of Hornsby Lane, which would require a section near the new route to be permanently closed. This closure would avoid having to move some overhead lines closer to properties in Chadwell St Mary. Alternatives to using Hornsby Lane would be available via the A1013 and Heath Road. Temporary restrictions due to construction are shown in the Streets Subject to Temporary Restrictions of Use Plans [**Application Document APP-027 and APP-029**], which shows roads that would be subject to temporary alteration, diversion and restriction of use. The Project has sought to ensure that all walking cycling and horse riding (WCH) routes that will be severed by the route (and historic severances where reasonably practicable) will be reconnected. As part of the wider WCH strategy, routes have been upgraded to improve connectivity and access for more users. Where appropriate bridges have been designed to accommodate active travel, and tie into the wider footpath and bridleway network. The WCH strategy has also explored improving and enhancing

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	WCH network connectivity between the surrounding communities. Total additional and improved provision equates to 64km of routes. These are summarised in Table 13.54 of ES Chapter 13: Population and Human Health [**Application Document APP-151**]. Since the Statutory Consultation in October 2018, following further engagement with key stakeholders including the host local authorities, a set of proposals was put together to maintain, improve and upgrade routes in the vicinity of the Project for walking, cycling and horse riding. These proposals were presented during Supplementary Consultation in January 2020, with further revisions presented during Design Refinement Consultation in July 2020 and the Community Impacts Consultation in July 2021. Information about the impact of the Project on PRoWs can be found in the Transport Assessment [**Application Document APP-529**]. Impacts on PRoW during the construction and operational phases of the Project are also assessed in ES Chapter 13: Population and Human Health [**Application Document APP-151**].
Concerns were raised about how accurately some works and impacts are presented in the Application documents, with the A13/A1089 junction and the Project's cultural heritage impacts being mentioned.	The Engineering Drawings and Sections, Volume F (A13 junction plan and profiles) [**Application Document APP-035**] provide the heights of bridges and slip roads for the proposed A13/A1089 junction, while the General Arrangement Plans, Volume C [**Application Document APP-017**] show the plan layout of the works and do not provide level details. The Structures Plans, Volume B [**Application Document APP-044**] provide information in relation to the bridge types. Any level information in the last of these that is inconsistent with other documents will be subject to editorial corrections with the Examining Authority. There are discrepancies between the impacts on heritage assets within the Community Impact Report's assessment [**Application Document APP-549**] which are lower than those reported within the Cultural Heritage Chapter of the ES [**Additional Submission AS-044**], and the Applicant will manage any necessary editorial corrections with the Examining Authority. The assessment within the chapter and assessment tables [**Additional Submission AS-052**] is correct.
Comments expressing concern about the impacts of the Project's construction and operation on the Whitecroft Care Home, near the A1013.	The Whitecroft Care Home is located south-east of the proposed A13/A1089/A122 Lower Thames Crossing junction. The Applicant has sought to address concerns raised by the owners of the care home, in particular concerns about noise and visual impacts, by moving the slip road further west, and increasing the amount of woodland planting between the home and the slip road. The Applicant has also included an earthwork bund to the west of the care home, which would be up to 9m above ground level. This would provide visual and noise screening once constructed. The A1013 Stanford Road is being rerouted further away from the north of the care home, reducing impacts during the operational phase. In addition, the Stanford Road compound has been relocated further away from the care home to further reduce

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	impacts. Discussions with the owner would continue in order to identify appropriate mitigation measures. Any impact on the business would be compensated in accordance with the Compensation Code. The Statement of Reasons [**Additional Submission AS-040**] provides information about engagement with the owners of the care home. The care home is referred to in the existing baseline section of ES Chapter 13: Population and Human Health [**Application Document APP-151**], under community land and assets. The impacts to community assets as a whole (including the care home) are assessed in ES Chapter 13 and in the Health and Equalities Impact Assessment [**Application Document APP-539**]. The Whitecroft Care Home is Grade II listed. Impacts of the Project on built heritage are assessed in the ES. ES Chapter 6: Cultural Heritage [**Additional Submission AS-044**] provides an assessment of the effects on the built heritage, including Listed Buildings. Additional information about how the Project is expected to impact local communities and the steps the Applicant would take to mitigate those impacts can be found in the Community Impact Report [**Application Document APP-549**].
Comments expressing concern about how the Project would impact the village of Orsett – in particular, how local communities would be affected during the Project's construction and operation, including changes to noise and air quality levels.	Local people and communities have been considered throughout the design and development of the Project and consulted with at appropriate stages of development. During the Community Impacts Consultation in July 2021, the Applicant published Ward Impact Summaries covering the North and South of the River Thames, which provided detailed explanations of the environmental impacts and mitigation measures in each area, including Orsett, with further details about the impacts on Orsett Showground and cultural heritage sites in Orsett. Consultation Report Appendix S contains more information about the Community Impacts Consultation material [**Application Document APP-087**] In response to concerns about the rerouting of traffic onto local roads in Thurrock and the lack of direct connectivity to the A1089 southbound from the Orsett Cock junction, the Applicant presented an additional change to the design of the proposed A13/A1089/A122 Lower Thames Crossing junction during the Local Refinement Consultation in May 2022. The revised junction design provides a direct link between the Orsett Cock junction and the A1089 southbound, which also improves connectivity from the A122 northbound and southbound to the A1089. Westbound traffic would be able to access the A1089 from the A13 via the Orsett Cock junction without the need to use local roads, such as Brentwood Road and the A1013 Stanford Road. An EIA has been carried out by the Applicant and is documented in the ES [**Application Documents APP-138 to APP-485**]. The ES includes assessments of the Project's impacts on specific

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	aspects of the environment, including Chapter 5, Air Quality [**Application Document APP-143**]; and Chapter 12, Noise and Vibration [**Application Document APP-150**]. Chapter 13 of the ES, Population and Human Health [**Application Document APP-151**], describes how local communities could be affected by the construction and operation of the Project and explains the ways in which these impacts would be reduced. ES Chapter 13: Population and Human Health [**Application Document APP-151**] includes information about how mitigation has been embedded within the Project's design and other steps that would be taken to mitigate the impacts on local communities, including in Orsett. As well as the assessments documented in ES Chapter 13, the Applicant has carried out a Health and Equalities Impact Assessment (HEqIA) [**Application Document APP-539**], which considers the Project's impacts during construction and operation on the health and wellbeing of local communities.
Concerns about safety in relation to the absence of a hard shoulder on the Project, with claims that the 'smart motorway' design is dangerous.	The Project is being designed to the requirements and specifications set out in the Design Manual for Roads and Bridges (DMRB). The new road is designed and would operate as an all-purpose trunk road (APTR). The DMRB baseline for APTRs is that there is no hard shoulder provision. The Project introduces safety and operational enhancements that are not normally associated with a standard APTR and include variable mandatory speed limits, signs and signalling, stopped vehicle detection, red-X lane signalling to support incident management, CCTV and emergency areas for road users to use in an emergency. Incident management plans and protocols would play a key part in minimising the impact of incidents. These systems are included in the Project's design to support its safety objectives and make the road safer for all road users. The Applicant would use the most current stopped-vehicle detection systems available at the time of opening, minimising both the risk of collisions and any reductions in traffic flow associated with temporarily closed lanes. The use of such technology would mean the new road would include more safety measures than existing A-roads. For more information about the design of the route, see the Project Design Report [**Application Document APP-506 to APP-515**] and the Design Principles [**Application Document APP-516**].
Comments calling for local access to the Project to be provided via the A226 near the South Portal. Concerns were also raised about HGVs using Chalk Road and concerns with the proposed North Portal maintenance and emergency access road.	A local access road was considered as part of the Project development following the Preferred Route Announcement in April 2017 until the submission of the Project at Statutory Consultation in October 2018. However, it was found that there was insufficient distance between the proposed A2/M2 junction and the South Portal to include a junction with the A226. For more information, see Section 3.16 of ES Chapter 3: Assessment of Reasonable Alternatives [**Application Document APP-141**]. The use of Chalk Road, Lower Higham, by HGVs is governed by the local highway authority, in this instance Kent County Council. The Applicant proposes to monitor the impacts of the Project on

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	traffic on the local and strategic road networks as set out in the WNIMMP [**Application Document** [**Application Document APP-545**]. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support Project development and case-making through existing funding mechanisms and processes. The North Portal maintenance and emergency access road is designed in accordance with relevant Highway standards. The ES Chapter 2: Project Description [**Application Document APP-140**] sets out the design standards used to design the Project. The Engineering Drawings and Sections (Volume E) (South Portal and Tilbury Plan and Profiles) [**Application Document APP-034**] show the plan and levels of the access layout. The layout provides a safe access on and off the Project for maintenance purposes, access to the Tunnel Control building and access in the case of an emergency. Traffic on these roads would be very low, with no access for general traffic.
Comments expressing a general desire to contribute to the Project's design.	The Applicant has carried out the most extensive consultation exercise ever undertaken for a UK road scheme, which has resulted in major improvements to the proposals. To date there have been nearly 400 days of consultation resulting in over 90,000 responses. Section 11.4 and 11.5 of the Consultation Report [**Application Document APP-065**] lists the issues raised during Statutory Consultation and presents the Applicant's responses to those issues, as well as indications as to whether the Project has changed its design as a result of considering those issues. The Applicant presented the draft Design Principles as part of the materials for the Community Impacts Consultation in July 2021. An updated Design Principles document [**Application Document APP-516**] was submitted for approval as part of the application for development consent. The Design Principles are legally secured via Requirement 3 of Schedule 2 of Part 1 of the draft DCO [**Additional Submission AS-038**], as well as Requirement 5. The Design Principles will continue to be reviewed and amended if necessary during the Examination process.
Comment that the Project should be planned and designed to improve safety and provide best opportunity to lower crime and fatalities, supporting measures to mitigate risk on the road network and to surrounding communities.	The Applicant has worked closely with emergency services in designing the Project. In response to feedback received during Statutory Consultation in October 2018, additional direct access points have been provided so that emergency vehicles could access the Project more quickly from the local road network. The Applicant would continue to work closely with the police and other emergency services to ensure the roads are safe and are equipped to deal with crime. Following further engagement with emergency services, the Applicant has revised the locations of the rendezvous points located near the tunnel portals. These are designated areas that allow controlled access for emergency services in the event of an

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	incident. The Applicant consulted on these locations during the Local Refinement Consultation in May 2022. For more information about how the route has been designed, see the Project Design Report [**Application Document APP-506 to APP-515**], the Design Principles [**Application Document APP-516**] and the General Arrangement Plans [**Application Document APP-017**].
Comments expressing concern about the adequacy of the walking, cycling and horse riding provision included in the Project. Concerns included the lack of a shuttle service through the tunnel for cyclists, a lack of detailed design information, and the potential for routes to be used illegally by quad bikes or motorbikes. Some called for nitrogen deposition compensation land to include new paths and bridleways.	**Adequacy of WCH proposals** The Applicant is one of the biggest builders of WCH routes in the UK. The Project's total provision of additional and improved equates to 64km of routes. The plans include seven new green bridges to provide safe and easy crossings for people and wildlife, including an 84m-wide green bridge in Kent, one of the widest in Europe. New footbridges, two over the A127 and one over the M25, would create safe and comfortable crossings and restore WCH links that have been severed by historic road building. For more information about the proposed WCH routes, see the Project Design Report Part E: Design for Walkers, Cyclists and Horse Riders [**Application Document APP-512**]. **Shuttle through the tunnel** The Applicant has considered various options during the development of the Project to provide improved river crossings for walkers and cyclists. The options investigated include using the tunnel, upgrading the existing ferry, relocating the ferry, building a separate bridge or cable car, and providing a shuttle service through the tunnel. All of these options have been rejected for reasons including lack of technical feasibility, operational issues, lack of commercial viability, cost, environmental impacts and impacts on safety. **Anti-social behaviour** The Applicant would continue to work with the relevant parties, including the police and other emergency services, to identify areas of concern such as antisocial behaviour and carry out appropriate mitigation. Clause PEO.06 of the Design Principles document [**Application Document APP-516**] describes how the use of robust design elements will be considered to prevent and mitigate the potential for misuse of the WCH network by unauthorised vehicles and to prevent and deter anti-social behaviour and unauthorised access to third-party land. **Routes through compensatory land** If appropriate, the areas of compensatory land intended to offset the impacts of nitrogen deposition would be made publicly accessible in a way that complements their primary function as compensatory habitats. **WCH surfacing and widths**

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	The exact type of surface for WCH routes has not been determined. The type of surface and widths would be specified during the detailed design phase in accordance with design standards and the Design Principles [**Application Document APP-516**], with the most appropriate option being used for each route. The Project Design Report [**Application Document APP-506 to APP-515**] includes indicative information about surfacing for new and upgraded routes, although the final details of these would be decided by the appointed Contractors within the parameters of the assessment.
Comments expressing concern about the two proposed walking, cycling and horse riding bridges over the A127, which it is claimed are not on the Project route. One Interested Party said these bridges should be paid for by people in Brentwood.	The Applicant is proposing to build two new WCH footbridges over the A127 to maintain connectivity for cycleways along the A127, The bridges would improve links for north–south WCH users, including providing horse riders with a safer link to bridleway BR183, avoiding an existing route shared with HGVs, and restore links severed by historic road building. Both bridges form part of a wider WCH strategy to improve leisure and utility routes in the vicinity of the Project, improving provision for people across the region. For more information about the proposed walking, cycling and horse riding facilities, see the Project Design Report Part E: Design for Walkers, Cyclists and Horse riders [**Application Document APP-512**].
Concern raised about previous and current proposals for horse riders in the vicinity of the A2/M2 and its proposed junction with the Project. Some Interested Parties expressed concern that the routes would involve permissive paths, rather than Public Rights of Way, while others expressed concern about the impact of the temporary National Cycle Route 177 on existing woodland, including veteran trees, and archaeological remains.	The Applicant's strategy for maintaining, upgrading and improving the walking, cycling and horse riding (WCH) networks near the Project has been to examine the existing network and how this could be improved, considering which areas around the Project it would be most advantageous to link or provide access to, and how working with the existing network could best facilitate this. All new routes would be designed to the latest standards, for example, where the Applicant is proposing new cycle routes that follow the alignment of an existing road, the cycle track would be separated from motor traffic. Where WCH share routes, the Applicant would ensure they are able to do so safely by providing appropriate width and segregation where practicable. The proposals were formulated after engagement with stakeholder groups including local authorities, Sustrans, Cycling UK, the Ramblers Association and the British Horse Society. The proposals for 60km of new and upgraded routes provide a significant improvement in quantity and quality over the current facilities for WCH near the Project. Details of the proposed routes can be found within the Project Design Report Part E: Design for Walkers, Cyclists and Horse Riders [**Application Document APP-512**]. The Design Principles [**Application Document APP-516**] explain which standards would be applied to new and upgraded WCH routes. **National Cycle Route 177 and equestrian provision** In response to feedback received during the Local Refinement Consultation in May 2022, the Applicant revised proposals for a

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	temporary route for National Cycle Route (NCR) 177. This route, south of the A2/M2, was previously proposed to be used during construction, and then to become a permanent bridleway. However, feedback was received from the Woodland Trust with regards to the proposed route's negative impacts on Ashenbank Wood due to increased usage of the existing Darnley Trail. This is a permissive route open to pedestrians, cyclists and horse-riders. Resurfacing of this section of the Darnley trail is required to facilitate its temporary use as a National Cycle Route. As a consequence of the Woodland Trust's comments this surface will now be removed when the permanent alignment of NCR177 is available and access rights will remain permissive, as existing. Therefore, there would be no permanent impacts on woodland or habitat in these areas and no impact on existing access rights for WCH. At Jeskyns a new bridleway was previously proposed between the east and west boundaries of the site. Feedback from Forestry England cited concerns about site management and interactions between different user groups, therefore they were not in favour of this new bridleway. As this is Crown land the Project has no power to designate a PRoW without consent. Consequently a new section of temporary permissive cycle route is now proposed through the eastern part of the site, with surface improvements to existing permissive routes further west. The existing horse-rider trail within Jeskyns will remain available to horse riders and will not be permanently impacted. There will be a new permissive bridleway link between this existing trail and Henhurst Road to increase east-west connectivity for horse-riders. Once works are complete the future of these new permissive routes at Jeskyns will be at the discretion of Forestry England. Once the Project is complete, NCR 177 would be realigned south of the A2/M2 along a new local road and outside of both Ashenbank Wood and Jeskyns Community woodland.
Suggestions for improvements for horse rider routes in north Kent and other areas.	The Applicant's proposals include new or improved bridges and pathways for walkers, cyclists, and horse riders, to encourage active travel between parks, woodlands, heritage sites and employment centres in Kent, Thurrock, Brentwood and Havering. The Project Design Report Part E: Design for Walkers, Cyclists and Horse Riders [**Application Document APP-512**] and Chapter 5 of the Planning Statement [**Application Document APP-495**] set out the proposals and explain the WCH strategy that helped formulate them.

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3.9 Construction (General and Highways)

Introduction

3.9.1 A total of 95 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Construction (General and Highways).

3.9.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-027 2.8 Streets Subject to Temporary Restrictions of Use Plans (Volume A) (Key Plan)

b. APP-050 2.17 Temporary Works Plans (Volume A) (Key Plan)

c. APP-091 5.2 Statement of Engagement

d. APP-122 5.4.4.2 Statement of Common Ground between (1) National Highways and (2) Brentwood Borough Council

e. APP-139 6.1 Environmental Statement – Chapter 1 – Introduction

f. APP-140 6.1 Environmental Statement – Chapter 2 – Project Description

g. APP-143 6.1 Environmental Statement – Chapter 5 – Air Quality

h. APP-144 6.1 Environmental Statement – Chapter 6 – Cultural Heritage

i. APP-146 6.1 Environmental Statement – Chapter 8 – Terrestrial Biodiversity

j. APP-150 6.1 Environmental Statement – Chapter 12 – Noise and Vibration

k. APP-151 6.1 Environmental Statement – Chapter 13 – Population and Human Health

l. APP-153 6.1 Environmental Statement – Chapter 15 – Climate

m. APP-154 6.1 Environmental Statement – Chapter 16 – Cumulative Effects Assessment

n. APP-159 6.2 Environmental Statement – Figure 2.4 – Environmental Masterplan Sections 1 & 1A (1 of 10)

o. APP-160 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 2 (2 of 10)

p. APP-161 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 3 (3 of 10)

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q. APP-162 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 4 (4 of 10)

r. APP-163 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 5 (5 of 10)

s. APP-164 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 6 (6 of 10)

t. APP-165 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 7 (7 of 10)

u. APP-166 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 8 (8 of 10)

v. APP-167 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 9 (9 of 10)

w. APP-168 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 10 (10 of 10)

x. APP-320 6.2 Environmental Statement – Figure 13.4 – Population and Human Health Assessment – Proposed WCH Links

y. APP-336 6.3 Environmental Statement – Appendix 2.2 – Code of Construction Practice, First Iteration of Environmental Management Plan

z. APP- 487 6.5 Habitats Regulations Assessment – Screening Report and Statement to Inform an Appropriate Assessment

aa. APP-495 7.2 Planning Statement

bb. APP-504 7.2 Planning Statement – Appendix I – Carbon Strategy and Policy Alignment

cc. APP-512 7.4 Project Design Report – Part E – Design for Walkers, Cyclists and Horse Riders

dd. APP-529 7.9 Transport Assessment

ee. APP-530 7.9 Transport Assessment – Appendix A – Public Rights of Way

ff. APP-539 7.10 Health and Equalities Impact Assessment

gg. APP-547 7.14 Outline Traffic Management Plan for Construction

hh. APP-549 7.16 Community Impact Report

ii. APP-552 7.19 Carbon and Energy Management Plan

jj. APP-554 7.21 Stakeholder Actions and Commitments Register

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kk. AS-006 2.2 Land Plans (Volume A) (Key Plan)

ll. AS-038 3.1 Draft Development Consent Order

Table 3.8 Summary of issues raised in RRs concerning Construction (General and Highways), and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about the impact of the Project's construction (including the utility diversions and proposed compounds) on local residents, property, homes, the environment and communities, along with suggestions that building the Project would require additional mitigation. There were also comments expressing concern at the Project's impacts on biodiversity during construction.	The Applicant has produced an EIA to assess the environmental impacts of the construction and operation of the Project, including the impacts on local communities. The EIA is documented in the ES [**Application Document APP-139**] along with embedded mitigation within the Code of Construction Practice (CoCP) [**Application Document APP-336**] and the Register of Environmental Actions and Commitments (REAC), which forms part of the CoCP. The Environmental Masterplan [**Application Documents APP-159 to APP-168**] is legally secured through Schedule 2 Requirement 5 of the draft DCO [**Additional Submission AS-038**]. More information on how the Applicant would reduce impacts on local communities, properties and homes can be found in the CoCP, as well as the topic chapters of the ES, in particular Chapter 5: Air Quality [**Application Document APP-143**], Chapter 12: Noise and Vibration [**Application Document APP-150**] and Chapter 13: Population and Human Health [**Application Document APP-151**]. ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] presents the Applicant's assessment as to how the Project's construction would impact species and habitats, including ancient woodland. Section 8.5 sets out the proposed mitigation and compensation measures to reduce or offset the impacts, while Section 8.6 presents the residual impacts. As well as the assessments of the impacts on population and human health documented in ES Chapter 13, the Applicant has carried out a Health and Equalities Impact Assessment (HEqIA) [**Application Document APP-539**], which considers the Project's impacts during construction and operation on the health and wellbeing of local communities. The HEqIA also considers the impacts on those protected by equalities legislation, such as children, older people, disabled people, and those with pre-existing health conditions. The size, number and location of the construction compounds and Utility Logistics Hubs (ULHs) have been developed in order to accommodate the required workforce, manage materials and plant, and provide controlled access to the worksites. To reduce impacts on local people, they would be located away from population centres, wherever practicable, and would be designed to maintain worker and public safety, while minimising environmental and community impacts. The Applicant has proposed mitigation to reduce the impacts of the compounds and ULHs. This includes the design and

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	positioning of lighting to minimise disturbance to nearby communities and habitats. It also includes designing fencing and hoarding to reduce visual and noise impacts (where applicable), the use of ecological fencing and using sustainable materials where practicable. During the Minor Refinements Consultation in May 2023, the Applicant proposed additional measures to reduce the impacts of the proposed ULHs, including relocating the Muckingford Road ULH so it would be further away from the residential area of Linford, which would reduce potential environmental impacts such as dust emissions and noise. In addition, the Applicant would co-locate the previously proposed Low Street Lane ULH with the Muckingford Road ULH, which would enable a 10% reduction in the total size of the ULHs from 2.0ha to 1.8ha More information about these changes can be found in the Minor Refinements Consultation supporting information (information booklet). More information on construction compounds can be found in ES Chapter 2: Project Description [**Application Document APP-140**] and Section 5.7 of the Planning Statement [**Application Document APP-495**], with the proposed mitigation set out in the CoCP [**Application Document APP-336**]. The Applicant has identified the beneficial and adverse impacts on traffic flows across the road network during operation, and this assessment is set out in Section 7.6 of the Transport Assessment [**Application Document APP-529**]. An impacts assessment has been conducted to determine the envisaged impact to the local community (including to private property and housing) and whether mitigation is required; for details of this assessment please refer to ES Chapter 13: Population and Human Health [**Application Document APP-151**]. During construction, the outline Traffic Management Plan for Construction (oTMPfC [**Application Document APP-547**] provides a series of controls that the Applicant would put into place to manage the impacts of construction traffic. It also includes a list of indicative temporary traffic management measures envisaged during construction including road closures. The impact of these have been assessed in Chapter 8 of the Transport Assessment [**Application Document APP-529**]. Residential owner occupiers outside the Order Limits are eligible to apply to have their property purchased via the discretionary purchase process. Providing certain criteria are met and the application is approved by the Applicant, the property would be purchased at its unaffected market value. Information about the impacts on local communities, including health impacts associated with construction of the Project, is also presented in the Community Impact Report [**Application Document APP-549**].
Comments expressing concern at the construction of the Project, in particular the need to monitor and	During the construction phase of the Project, the Applicant's appointed Contractors would carry out monitoring to ensure that environmental impacts, such as changes to air quality or noise levels, in the vicinity of the Project stay within agreed limits

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
mitigate impacts throughout construction, as well the need for the Applicant to effectively communicate with local residents, businesses and communities during the construction period.	compared with baseline levels assessed before construction started. For example, a Noise and Vibration Management Plan (NVMP) or equivalent would be prepared for each part of the construction works subject to consideration by the relevant local planning authority. Chapter 2 of the CoCP [**Application Document APP-336**] states that the Second Iterations of the Environmental Management Plans (EMP2) developed by the appointed Contractors would set out their procedures for monitoring compliance with the mitigation measures set out in the CoCP and the REAC relevant to the works. The EMP2s would include Contractor roles and responsibilities, together with appropriate control measures, training and briefing procedures, risk assessments, stakeholder engagement and monitoring systems to be employed. The Applicant would provide regular communication and advance notice of activities during the construction period. Paragraph 5.3.2 of the CoCP [**Application Document APP-336**] states that at least two weeks before planned works are carried out, the Contractors would distribute information sheets relating to the programmed activities. The information sheets would detail the expected disruptions and measures being taken to avoid, minimise or mitigate the adverse impacts of these works. A community liaison group (CLG) would be established in communities likely to be most impacted during construction and CLGs would be invited to attend the Traffic Management Forum (TMF); further details are set out in the CoCP [**Application Document APP-336**] paragraphs 5.2.11 to 5.2.15 and the oTMPfC paragraphs 3.3.15 to 3.3.19 [**Application Document APP-547**] provides further details relating to the TMF.
Comments expressing concern that the construction of the Project would have a negative impact on local communities because the proposed daily working hours are considered to be too long, along with comments expressing concern at the length of the construction programme. Some expressed a lack of confidence in the Applicant's ability to deliver the Project on time or to budget.	In the main, construction would be carried out during the normal working hours, as set out in the CoCP [**Application Document APP-336**]. The proposed normal working hours would be from 07:00 to 19:00 on weekdays (excluding bank holidays) and from 07:00 to 16:00 on Saturdays. The normal working hours set out in the CoCP also provide that earthworks may be carried out between 07:00 and 22:00 Monday to Saturday, with this expected to be used during the summer to take advantage of better weather and extended daylight hours. This is specific to earthwork activities and only at locations that are 300m from sensitive receptor sites. Normal hours for tunnelling and other underground works would be 24/7 because operating the tunnel boring machines, casting tunnel segments, and lining the tunnel continuously are necessary to minimise the risks associated with, among other things, ground movement and water ingress. In addition to the tunnel construction activities, the Applicant has identified highways and utilities construction activities and locations that would operate 24/7 when required. Additional

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	working hours would also be necessary for some works on the existing utility, road and rail networks to reduce disruption. The Project's construction schedule and budget has been developed using industry-standard planning methods. These are supported by realistic development, design and construction durations verified against other schemes of similar scale and complexity. Internal and external budget and timescale reviews would continue throughout the lifetime of the Project.
Comments expressing concern at the expected increase in construction traffic, including HGVs, while building the Project, with additional concerns about the routes and access points that construction traffic would use, and the proposed traffic management measures, such as road and lane closures and reduced speed limits (including around the A13). The impacts on commuters, postal and emergency services was mentioned.	Access routes to compounds and worksites for construction traffic would be limited, as far as practicable, to the SRN and main roads on the local road network. The appointed Contractors would seek to take construction traffic off local roads by building temporary haul roads that link the SRN directly to construction compounds. For example, the A2 compound would be accessed via a dedicated haul road from the eastbound A2/M2. In the main, these haul routes would only be in place during the construction phase, apart from instances where they form part of the permanent design, including access routes for the maintenance and operation of the Project and those surrounding utility networks The proposed haul routes are shown in the Temporary Works Plans [**Application Document APP-050**] and in the Outline Traffic Management Plan for Construction (oTMPfC) [**Application Document APP-547**]. The Applicant would be required to submit a Traffic Management Plan for Construction (TMP) to the Secretary of State for approval following consultation with the relevant highway authority and, where different, the relevant planning authority and other bodies identified in the oTMPfC. This is secured through Schedule 2 Requirement 10 of the draft DCO [**Additional Submission AS-038**]. The TMP would include information about traffic management measures such as temporary lane or road closures, traffic lights, and speed limit reductions, which would be necessary to maintain safety for road users and reduce the impacts of construction traffic. The oTMPfC includes a robust approach to traffic monitoring, to help develop, determine and implement appropriate mitigation for any localised traffic and traffic-related impacts which arise as a result of construction of the project. In advance of the construction works, a TMP would be prepared for each part of the works. The TMP for the construction works would specify any diversion routes that may be required, subject to engagement with relevant authorities. A TMF would be established to discuss traffic management measures including associated phasing of the works and durations. Updates to the TMPs would be consulted upon with the relevant local highways authority. The Transport Assessment **[Application Document APP-529]** presents the Project's impact on the strategic and local highway networks, road safety, and local sustainable modes of transport, including public transport. It also sets out the impact of

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	construction on the road network, including changes to existing traffic patterns as a result of predicted construction traffic movements and temporary traffic management measures. Since Statutory Consultation in October 2018, amendments to the Project's designs have nearly halved the proposed numbers of HGV journeys during construction. At Statutory Consultation, the Applicant proposed an average of 17,500 HGV journeys a month (where a journey refers to a single HGV movement in or out of the construction area). The Applicant's latest proposals would mean a reduction to an average of 9,500 HGV journeys per month across the whole Project during the construction phase, which is a 46% reduction on the number of HGV journeys proposed in 2018. The Applicant has worked closely with emergency services in developing the Project's proposals, during the design and development of the Project to mitigate any impacts, and there is ongoing engagement including through a regular Emergency Services and Safety Partners Steering Group. A number of amendments to the design of the Project have been made following feedback from the emergency services to minimise the impacts on services during the construction phase and this engagement would continue after development consent is granted. For more information, see the Statement of Engagement [**Application Document APP-091**].
Concerns raised about the proposed works and construction compounds for the new A13 junction, and the potential impacts on local residents and communities, in particular residents of a care home.	While the proximity of Whitecroft Care Home to the construction works is noted, the Applicant has identified the care home as a sensitive receptor, as outlined in ES Chapter 13: Population and Human Health [**Application Document APP-151**] (paragraph 13.6.75) where it is stated that '*The Whitecroft Care Home is identified as being of high sensitivity. Impacts on the care home are assessed as minor adverse due to a discernible change in access during the construction period, resulting in a slight adverse level of effect which is not significant.*' In order to minimise impact of construction on, amongst other areas, the Whitecroft Care Home, relevant mitigation is secured in the CoCP [**Application Document APP-336**], in Table 7.1: REAC including relating to air quality, noise and light pollution. The Stanford Road compound was initially proposed occupying the north-east corner of the Whitecroft Care Home land but this location was reviewed and moved due to proximity and perceived impact on the care home. There are no 24-hour construction activities in the immediate vicinity of the Whitecroft Care Home. Night-time or weekend activities would be limited to the final tie-ins of the new infrastructure to the existing infrastructure and bridge construction which is required under road closures, and all would be communicated in advance to the affected communities. All other works would be performed during normal working hours as set out in the CoCP [**Application Document APP-336**].

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	The Contractors would be required to develop an Engagement and Communications Plan (ECP) that would ensure that stakeholders are informed of the works activities and to maintain good relationships with other parties. Further information on communication and community engagement is set out in Section 5 of the CoCP.
Concerns raised about how construction and operation of the Project would affect Brentwood Enterprise Park and the immediate area.	Discussions are ongoing with Brentwood Borough Council and Brentwood Enterprise Park (BEP) about the interface between the Project, the developer St Modwen and BEP. Refer to the SoCG [**Application Document APP-122**] between the Applicant and Brentwood Borough Council, page 6, item 2.1.9, where the principles of access from Warley Street and the operation of the two projects working concurrently is detailed.
Comments expressing concern that building the Project would impact or prevent access for local residents, businesses and communities.	The Applicant would expect to maintain accesses to businesses and residential properties throughout construction. If there were any impacts, the Applicant would engage with affected parties and, where possible, give them advance notice about any temporary impacts on their access. However, in the case of an emergency (such as a burst pipe) the Applicant would work to neutralise any harmful impacts immediately for the benefit of all parties, even if this meant temporarily closing an access.
Comments expressing concern that building the Project would impact the safety of walkers, cyclists and horse riders, as well recreational facilities, including a scout camp and Public Rights of Way around North Ockendon.	During construction, the Applicant would seek to minimise impacts on PRoWs wherever practicable. Information about which PRoWs and roads would be affected during construction can be found in the Streets Subject to Temporary Restrictions of Use Plans [**Application Document APP-027**] and Schedule 3 of the draft DCO [**Additional Submission AS-038**]. Where required, temporary diversion routes would be put in place until the construction works are complete. The REAC contained in the ES Appendix 2.2: Code of Construction Practice [**Application Document APP-336**] includes a commitment reference PH001 around the importance of reducing the durations that footpaths, cycleways and bridleways would need to be closed and mitigation measures to be followed. These would also be included and therefore have to meet the requirements of the TMP as described in the oTMPfC [**Application Document APP-547**]. The Applicant has consulted with relevant stakeholders in developing the temporary diversions routes for impacted routes, which are detailed in Appendix B of the oTMPfC [**Application Document APP-547**]. This engagement would continue in advance of closing PRoWs, whereby the temporary diversion route would be determined through discussions with the local highway authority. Chapter 8 of the Transport Assessment [**Application Document APP-529**] sets out the forecast impacts on journey times on routes including Station Road/Fort Road/A1089, which would be relevant for people travelling to the Condovers Scout Camp. The Transport Assessment identifies negative impacts on journey time only during the AM peak, for six out of the 11 phases of construction;

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	no change in journey time has been assessed as being greater than 2.3 minutes (this is during Phase 3, for all other phases, increase in journey time is likely to be less than two minutes). Table 2.3 of the oTMPfC [**Application Document APP-547**] identifies stakeholder considerations that would be addressed as a minimum by the TMP; this includes impacts on community facilities such as the Condovers Scout Camp, and states that activities such as advance warning/particular sensitivity around significant events, particularly evenings and weekends would be incorporated into the TMP and engagement with relevant stakeholders would take place as appropriate. Proposed PRoWs within the vicinity of the Order Limits have been identified and are shown on ES Figure 13.4: Population and Human Health Assessment – Proposed WCH Links [**Application Document APP-320**]. PRoWs within the immediate vicinity of the Condovers Scout Camp would not be affected by construction activities and would remain open during the construction period. The Project Design Report Part E: Design for Walkers, Cyclists and Horse Riders [**Application Document APP-512**] shows the footpaths in the area of Ockendon Road that are affected. These are Footpaths 151, 230, 251 and 252. The effects on PRoWs are identified in Table 13.66 of ES Chapter 13: Population and Human Health [**Application Document APP-151**].
Comments expressing concern about proposed road closures during construction, in particular the bridge over Ockendon Road, with some comments saying the information provided so far has been insufficient.	The Applicant's proposed road closures are set out in the oTMPfC [**Application Document APP-547**]. The Applicant consulted on a draft of this document during the Community Impacts Consultation in July 2021, which included information about the proposed Ockendon Road bridge closure. The Applicant also presents information about the proposed Ockendon Road bridge closure in its Consultation Report [**Application Documents APP-064 to APP-069**]. For example, page 3520 of the Consultation Report – Part 4 of 6 [**Application Document APP-067**] explains why this road would have to close, for how long and the proposed diversion. Following DCO application submission this matter has been under discussion with London Borough of Havering. Whilst a closure of the road is unavoidable to enable a safe working provision for the construction of the construction works, the Applicant has committed to a closure up to a maximum of 10 months. This is reflected in the updated oTMPfC and is a new commitment in the Stakeholders Actions and Commitments Register [**Application Document APP-554**] both of which are submitted at Examination Deadline 1, alongside this document.
Comments expressing concern about safety during construction, on the road network and within the construction areas,	The safety of workers, road users and local people has been prioritised throughout the lifetime of the Project. During construction, the Applicant would set challenging health, safety and wellbeing targets aligned to its Home, Safe and Well strategy

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
including concerns the Project would be a burden on local health or emergency services.	(Highway England, 2019). The REAC contains commitment PH002 which states: '*The Contractor will provide an appropriate range of medical and occupational healthcare services (including on-site facilities) to meet the physical and mental health needs of the construction workforce. The range of services will be agreed with National Highways, following engagement with Integrated Care Partnerships.*' [**Application Document APP-336**]. As such, the Applicant expects the construction of the Project to be carried out to appropriately high safety standards, with minimal impact on local health or emergency services. The Transport Assessment [**Application Document APP-529**] presents the Project's impact on the strategic and local highway networks, road safety, and local sustainable modes of transport, including public transport. It also sets out the impact of construction on the road network, including changes to existing traffic patterns as a result of predicted construction traffic movements and temporary traffic management measures.
Comments expressing concern at proposals to restore land that is temporarily acquired for the Project's construction programme and the Project's ability to deliver successfully on these commitments.	The Applicant's Land Plans [**Additional Submission AS-006**] set out clearly whether land is needed permanently or temporarily. Under article 35 of the draft DCO [**Additional Submission AS-038**], before giving up possession of temporary use land, the Applicant would be required to restore the land to the reasonable satisfaction of the owner. This obligation is subject to the exceptions set out in article 35(6), which include the right to retain any permanent works constructed on the land, such as diverted utilities. Reinstatement of land and the timescales for this would be agreed with the relevant landowner, with details varying depending on the type of land being used temporarily.
Comments suggesting that local roads used by construction traffic should be maintained and repaired throughout the Project's construction.	Construction traffic would use the SRN or private haul roads, wherever practicable, to reduce the impacts on local roads. This would reduce the likelihood of construction traffic increasing wear on local roads. In some instances, the Order Limits include provision for the Applicant to widen or strengthen roads to accommodate construction traffic if required – for example, along Thames Medway Canal access road in Gravesham.
Comments expressing concern that the construction and use of a proposed water outfall near Lower Higham Road would impact local residents and the Thames Estuary and Marshes SPA and Ramsar site.	The outfall is proposed to manage rainfall run-off from the South Portal worksite. The design would use a series of settlement lagoons in the land between the A226 and Lower Higham Road to treat run-off prior to its discharge. Any discharge into the protected area would be consented by the Environment Agency, having been treated to the required standards and discharged at a controlled rate to protect the ditch network. The Applicant's Habitats Regulations Assessment – Screening Report and Statement to Inform an Appropriate Assessment [**Application Document APP-487**] states that the Project would have no adverse effects on the integrity of the Thames Estuary and Marshes Ramsar site.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	To implement these water management proposals, the Applicant would lay a temporary pipe under Lower Higham Road and the Ramsar site using a trenchless drill and then use conventional construction techniques to continue the pipe across the field to reach the proposed outfall on the western boundary. The works would involve some temporary impacts in the local area while the pipeline is installed, but accesses would be maintained, with no permanent impacts on local residents. These works are described in paragraph 2.7.166 in ES Chapter 2: Project Description [**Application Document APP-140**] and assessed in paragraph 14.6.34 of ES Chapter 14: Road Drainage and the Water Environment [**Application Document APP-152**].
Comments expressing concern that the Project's construction would result in a significant increase in greenhouse gas emissions.	The Project is setting out an industry leading position in terms of driving out carbon in the preliminary design and setting a framework to continue to reduce its carbon impact through the commitments made in the Carbon and Energy Management Plan, which is one of three documents dealing with carbon reduction in the DCO Application: • ES Chapter 15: Climate [**Application Document APP-153**] • Planning Statement Appendix I: Carbon Strategy and Policy Alignment [**Application Document APP-504**] • Carbon and Energy Management Plan [**Application Document APP-552**]. Additionally, a review and the Project's response to legislation, policies and plans relevant to climate is presented in ES Appendix 15.1: Climate Legislation and Policy [**Application Document APP-480**]. ES Chapter 15 [**Application Document APP-153**] and Planning Statement Appendix I [**Application Document APP-504**] explain that carbon impacts associated with construction of the Project have been calculated as being no larger than 0.058% of the fourth carbon budget. It also explains that the Department for Transport's Decarbonising Transport: A Better, Greener Britain is expected to lead to significant reductions in road-user emissions over the lifetime of the Project. A second iteration of the Carbon and Energy Management Plan [**Application Document APP-552**] would be used to demonstrate the implementation of the carbon commitments secured through the DCO during the construction phase and would set out the ways in which appointed Contractors would demonstrate that carbon emissions are kept within the defined limits. The Project has a commitment to implement the PAS2080 'Carbon Management in Infrastructure' standard, and each Contractor's plan would be refreshed annually to demonstrate it remains consistent with emerging best practice and aligned with their emissions pathway.

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3.10 Construction (Tunnels and Utilities)

Introduction

3.10.1 A total of 11 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Construction (Tunnels and Utilities).

3.10.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-112 5.4.3.15 Statement of Common Ground between (1) National Highways and (2) NextGen Access

b. APP-140 6.1 Environmental Statement – Chapter 2 – Project Description

c. APP-335 6.3 Environmental Statement – Appendix 2.1 – Construction Supporting Information

d. APP-336 6.3 Environmental Statement – Appendix 2.2 – Code of Construction Practice, First Iteration of Environmental Management Plan

e. APP-547 7.14 Outline Traffic Management Plan for Construction

f. AS-006 2.2 Land Plans (Volume A) (Key Plan)

g. AS-010 2.2 Land Plans – Volume C – (Sheets 21 to 49)

h. APP-020 2.6 Works Plans (Volume C) Composite

i. AS-038 3.1 Draft Development Consent Order

j. AS-042 4.2 Book of Reference

k. APP-060 4.1 Statement of Reasons

Table 3.9 Summary of issues raised in RRs concerning Construction (Tunnels and Utilities), and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern at the impacts caused by works to divert gas pipelines, overhead power lines, water pipes, and underground communications.	In developing the proposals, the Applicant has sought to minimise the need for utility works – including overhead power line, gas pipeline and communications diversions – but, where these cannot be avoided, these works have been designed to minimise environmental and community impacts – for example, by reducing the amount of existing infrastructure to be modified by the Project. This includes minimising any interruption to supply during any work affecting utility infrastructure. In accordance with the requirements for Nationally Significant Infrastructure Projects, an EIA has been carried out to assess the

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	environmental impacts of the construction and operation of the Project, including the impacts on local communities. The impacts of utility diversions have been included in this assessment, with details of the proposed works set out in ES Chapter 2: Project Description [**Application Document APP-140**], with more information about the utilities construction schedule available in ES Appendix 2.1: Construction Supporting Information [**Application Document APP-335**]. Mitigation requirements have been incorporated into the proposals, either as mitigation that is embedded within the design of the Project or as good practice or essential mitigation within the CoCP [**Application Document APP-336**] and the REAC, which forms part of the CoCP. Compliance with the CoCP and the REAC is a legally binding requirement under Requirement 4 of Part 1 of Schedule 2 of the draft DCO [**Additional Submission AS-038**]. The CoCP includes information about how phases of construction, including above ground and underground utility diversions, would be aligned to reduce disruption and minimise the work schedule. It also includes information about utility works, logistics and traffic management, all of which would help mitigate impacts during the construction phase.
Concern expressed about the need to provide utility diversions for construction compounds or Utility Logistics Hubs. These included comments concerned about the proposed water supply to the northern tunnel entrance compound to be used for tunnel boring.	The Applicant's proposals for utility works allow for the provision of power, water and communications to the construction compounds. This is standard practice for major construction projects, allowing the works areas to operate safely and efficiently. The northern tunnel entrance compound would be equipped with a dedicated high-volume water pipeline to allow the tunnel boring to take place. Tunnel Boring Machines use water to produce slurry as part of their excavation process. Materials excavated from the tunnels would be in the form of slurry pumped from the tunnel boring machine to the "Slurry Treatment Plant" equipment. The slurry would be treated to a suitable form to be used to construct Tilbury Fields located on top of Goshems Farm, near to the North Portal. Information about the proposed utility works, including tunnel excavation methods, is presented in ES Chapter 2: Project Description [**Application Document APP-140**].
Comments expressing concern about the cost and duration of the proposed utilities works. Some comments said the works should be coordinated to reduce the construction time needed.	In developing proposals for utility works, the Applicant has worked closely with utility companies and has sought to reduce impacts on local communities wherever practicable, while ensuring the Project is affordable to Government and could be constructed and operated safely and efficiently. Utility works would only be carried out where necessary to implement the Project, either to divert utility infrastructure to accommodate the route or to provide essential services to sites during construction and operation of the A122. The Project's construction schedule has been developed using industry-standard planning methods. These are supported by realistic development, design and construction durations verified against other schemes of similar scale and complexity. Internal and

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	external budget and timescale reviews would continue throughout the lifetime of the Project. The utility works schedule would encourage a collaborative approach with utility companies to reduce the impact of works – for example, through sharing construction space. Affected parties would be given advance notice before land is accessed to carry out utility works. An indicative works timeline for each part of the Project is included in the relevant section of ES Chapter 2: Project Description [**Application Document APP-140**].
Comments referring to plans for temporary or permanent acquisition in relation to utilities.	All land included in the Order Limits is required to either construct, operate or maintain the Project. A Statement of Reasons [**Application Document APP-060**], setting out why compulsory acquisition powers are necessary in relation to each individual parcel of land, is included with this Application. Any land to be permanently acquired by the Applicant is necessary for the Project. The Applicant's Land Plans [**Additional Submission AS-006**] set out clearly what land is required for the Project and whether land is needed permanently or temporarily. Under article 35 of the draft DCO [**Additional Submission AS-038**], before giving up possession of temporary use land, the Applicant would be required to restore the land to the reasonable satisfaction of the owner. This obligation is subject to the exceptions set out in article 35(6), which include the right to retain any permanent works constructed on the land, such as diverted utility infrastructure. Reinstatement of land and the timescales for this would be agreed with the relevant landowner, with details varying depending on the type of land being used temporarily. Where impacts are temporary during construction, the Applicant would seek to return the land to its original condition, although permanent rights may be necessary for maintenance or access to utilities once works are complete and the Project is operational.
Concerns expressed at the impacts of a new high-pressure gas main on a residential property.	Possession of an area of a landowner's rear garden and adjoining field is required temporarily (Plot 33-276) – in the Land Plans Volume C [**Additional Submission AS-010**] – and temporarily with the permanent acquisition of rights (Plot 33-270) for the installation, operation and maintenance of a diverted high-pressure gas pipeline (Work No. G6) – see Works Plans (Volume C) Composite [**Application Document APP-020**] and the draft DCO [**Additional Submission AS-038**]. The works would be undertaken using industry best practice and legislation and would not directly impact the residential property. The Applicant has engaged with the landowner to make them aware of their right to compensation for any loss in accordance with the Compensation Code.
Concern expressed about the proximity of proposed construction works to an existing high-pressure pipeline.	United Kingdom Oil Pipelines Limited (UKOP) has the benefit of easements or other private rights over land plots contained within the Order Limits as shown on Sheets 48 and 49 of the Land Plans [**Additional Submission AS-010**] and as listed within the Book of Reference [**Additional Submission AS-042**]. The Project has

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	liaised with UKOP regarding its intended proposals since January 2020. Discussions have been held with the British Pipeline Agency (BPA) and the works required by the Project in the vicinity of the pipeline have been explained. The Applicant confirms that during the detailed design and development stage of the Project, the Applicant would consult with UKOP and BPA at the point that the works and associated programme within the vicinity of the pipeline are known to ensure they are completed in a manner that ensures safety of the workforce and the pipeline. The vicinity of the pipeline would be determined in accordance with the UKOP publication Working Safely Near High Pressure Pipelines.
Concern expressed about the proximity of proposed construction works to existing communications utilities infrastructure.	The Applicant is aware of those networks operated by ITS Technology Group Ltd and has made provision for them within the application. The draft DCO [**Additional Submission AS-038**] contains Protective Provisions for the protection of operators of electronic communications code networks at part 2, Schedule 14. These provisions apply to ITS Technology Group Ltd protecting their interests. The Applicant has reflected the change of company name within Article 8 of the draft DCO [**Additional Submission AS-038**] and the SoCG between the parties at Deadline 1 (DL 1) (Statement of Common Ground between (1) National Highways and (2) ITS Technology Group Ltd/NextGen Access [**Application Document APP-112**]).
Concerns raised regarding the impact of utilities works on local residents and communities in the area of Beredens Lane.	The Applicant is proposing an HGV ban along Beredens Lane, limiting its use to emergency vehicles and motorway-prohibited traffic only. HGVs servicing the Project's construction would access the Beredens Lane Utility Logistics Hub (ULH) directly from the M25. The Applicant intends to access the Beredens Lane ULH from the M25, rather than via Beredens Lane or Codham Hall Lane. Accessing the ULH from the M25 would not need any additional third-party land or require an additional interface with the high-pressure gas pipeline, and would reduce the need to remove additional vegetation. This proposal would be secured via, and reflected in, the next version of the outline Traffic Management Plan for Construction [**Application Document APP-547**].

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3.11 Operation and Maintenance

Introduction

3.11.1 A total of 49 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Operation and Maintenance.

3.11.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-490 6.7 Outline Landscape and Ecology Management Plan

b. APP-495 7.2 Planning Statement

c. APP-506 7.4 Project Design Report – Part A – Introduction and Project Background

d. APP-516 7.5 Design Principles

e. APP-547 7.14 Outline Traffic Management Plan for Construction

f. APP-539 7.10 Health and Equalities Impact Assessment

g. APP-141 6.1 Environmental Statement – Chapter 3 – Assessment of Reasonable Alternatives

Table 3.10 Summary of issues raised in RRs concerning Operation and Maintenance, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments about how the Project would handle incidents on approach roads, what would happen if either Dartford or the Project had to close for an emergency or maintenance, what emergency access points would be available, including for helicopters.	**Project design and maintenance** Once operational, the Project would conform to the appropriate safety standards for highways. The Project Design Report [**Application Document APP-506 to APP-515**] demonstrates, in accordance with the NPSNN, how the design process was conducted and how the proposed design evolved. The Project proposals have been designed in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB). The detailed design for the Project would be carried out by the appointed Contractors in accordance with the DMRB standards published at the time of detailed design. Maintenance requirements would be minimised through good design, reducing the impacts on road users as much as possible. Maintenance would be coordinated to minimise the periods when lane or carriageway closures are necessary. **Closure of river crossings** The Project would provide additional resilience for river crossings east of Greater London. With both the Dartford Crossing and the Project operational, there would be an alternative if one were

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	disrupted, although this would likely be accompanied by short-term congestion. **Emergency access and evacuation** The Applicant has and continues to work closely with representatives of the emergency services to ensure the Project is aligned with their requirements. Emergency access and rendezvous points have been included at appropriate locations after consultation with key stakeholders. More information can be found in the Project Design Report [**Application Document APP-506 to APP-515**]. **Helicopter access** The Applicant would develop plans and contingencies for facilitating emergency access throughout the detailed design process, which would include helicopter access. The Applicant is engaging and will continue to engage with emergency services to ensure that emergency incident measures and plans are in place.
Comments expressing concern with the safety and design of smart motorways and the use of such features on the Project.	The Project is being designed to the requirements and specifications set out in the Design Manual for Roads and Bridges (DMRB). The new road is designed and would operate as an all-purpose trunk road (APTR). The DMRB baseline for APTRs is that there is no hard shoulder provision. The Project introduces safety and operational enhancements that are not normally associated with a standard APTR and include variable mandatory speed limits, signs and signalling, stopped vehicle detection, red-X lane signalling to support incident management, CCTV and emergency areas for road users to use in an emergency. Incident management plans and protocols would play a key part in minimising the impact of incidents. These systems are included in the Project's design to support its safety objectives and make the road safer for all road users. The Applicant would use the most current stopped vehicle detection systems available at the time of opening, minimising both the risk of collisions and any reductions in traffic flow associated with temporarily closed lanes. The use of such technology would mean the new road would include more safety measures than existing A-roads. For more information about the design of the route, see the Project Design Report [**Application Documents APP-506 to APP-515**] and the Design Principles [**Application Document APP-516**]. The Applicant consulted on the draft Design Principles during the Community Impacts Consultation in July 2021.
Comments about road classification and users. Suggestions included maintaining the same motorcycle classifications in place at the Dartford Crossing for the Project and restricting hydrogen-powered vehicles from	**Permitted vehicles** Although the Project is not a motorway, similar road user restrictions would apply for safety reasons, so pedestrians, unaccompanied learner drivers, low-powered motorcycles, cyclists, horse riders and agricultural vehicles would be prohibited. These restrictions are due to the high volumes of high-speed traffic expected to use the route. Standard motorcycles would be allowed to use the road, as they can a motorway.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
using the tunnels, as at Dartford.	**Hydrogen freight and hydrogen-powered vehicles** Under the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR), there are no restrictions at the Dartford Crossing tunnels for vehicles that use hydrogen as a form of propulsion if this is undertaken in accordance with 1.1.3.2 of the ADR. The Dartford Crossing tunnels have been classified as Tunnel Category C tunnels under the ADR and, as such, some dangerous goods are banned from being transported through those tunnels, while others can only transit under special conditions to ensure safety. Hydrogen in bulk tanks is banned from being transported through the Dartford Crossing tunnels because it has a Tunnel Restriction Code of 'B'. The Project's tunnels would be classified as Tunnel Category A under the ADR and, as such, would have no restrictions on the transit of hydrogen-fuelled vehicles or the bulk transportation of hydrogen in tanks.
Comments expressing concern at the lack of roadside service facilities as part of the Project. Comments included suggestions to provide secure lorry parking and charging points for electric vehicles.	The Applicant is working with roadside service facility operators, the haulage industry and road user groups to consider further the need for roadside service facilities and, if a need is identified, the most appropriate location on the SRN. Any future roadside service facility would be developed and operated by a third-party roadside service facility operator and would need planning consent from the local planning authority, providing opportunities for interested parties to make their views known about those proposals at that time – for example, commenting on what facilities should be provided, such as electric vehicle charging points or HGV parking.
Comments expressing concern about the expected increase in litter and fly-tipping once the Project is operational, both along the new road and in the surrounding area. There were also concerns about anti-social behaviour in new publicly accessible recreation areas.	The Applicant would be responsible for maintenance of the new road, including keeping it free of litter and other waste and debris. This would be carried out in line with the Applicant's Litter Strategy (Highways England, 2020c). Existing local roads would be under the control of the relevant local authority, which would include maintenance, litter removal and enforcement of rules forbidding fly-tipping and other anti-social behaviour. Establishment of the mitigation and compensation areas, including Chalk Park, would be undertaken on behalf of the Applicant by the appointed Contractors. Ongoing (long-term) management, maintenance and monitoring, beyond initial establishment periods, would be delivered by the Applicants' Operational and Maintenance teams or through agreement with third parties (to be confirmed). For more information, see paragraph 4.1.1 of the oLEMP [**Application Document APP-490**].
Comments about the current operation of the Dartford Crossing and how traffic is slowed while passing through junctions	In 2009, the DfT commissioned a study to investigate how to address capacity constraints at the Dartford Crossing. The study included consideration of what could be done to improve traffic

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
as it enters and exits the crossings, with the suggestion that improving the existing crossing is an alternative to building a new one.	flow at the existing Dartford Crossing in the short- to medium-term. The study identified options for providing additional capacity at the Dartford Crossing through use of new technology and amended layouts at the toll booths, which were implemented in 2014. Section 5.4 of the Planning Statement [**Application Document APP-495**] and ES Chapter 3: Assessment of Reasonable Alternatives [**Application Document APP-141**] explain the full range of route options considered including further improvements to the Dartford Crossing and explain why these measures were not sufficient to increase capacity, nor would they met the scheme objectives. Strategic options were revisited as part of the 2022 options reappraisal, which confirmed that the decisions made remain valid, with this process set out in Section 5.4 of the Planning Statement [**Application Document APP-495**].
Some emergency service operators sought funding from the Applicant to increase their capacity during the construction and operational periods in order to handle a predicted increase in incidents, such as road traffic collisions or incidents involving workers in the area (either as victims or involved parties). The appropriate location and design of construction compounds was mentioned as a factor that could help reduce crime.	**Funding emergency services** The Project is committed to continual engagement with emergency services to develop appropriate construction and operational incident management plans and to minimise as far as reasonably practicable impacts on service capabilities. Furthermore, the Applicant will support the emergency services in determining operational impacts and service gaps to inform the Department of Transport and Home Office. However, it is not within the remit of the Applicant to reappropriate funding from the Project to other central government funded services. A business proposal from an affected police force for an additional Traffic Officer to handle Project-related construction impacts has been accepted by the Applicant. **Construction compounds** The location, design and security of site compounds would follow any applicable security standards where appropriate.
Concerns were expressed by some emergency services that construction of the Project would impact their ability to deliver services.	The Project has set out in the outline Traffic Management Plan for Construction [**Application Document APP-547**] an outline framework that would be applied for the design, management, road space booking and transport logistics for the Project. This document has been developed following technical engagement with key stakeholders, including emergency services, providing a framework of principles and mechanisms that inform how detailed traffic management plans would be developed. The document outlines roles and responsibilities and the establishment of the Traffic Management Forums for all stakeholders including the emergency services.

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3.12 Charging

Introduction

3.12.1 A total of 49 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Charging.

3.12.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application documents

a. APP-517 7.6 Road User Charging Statement

b. AS-038 3.1 Draft Development Consent Order

Table 3.11 Summary of issues raised in RRs concerning Charging, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments opposed to implementing a charge for the Project once it is open. Comments that everyone in the vicinity of the Project should benefit from a Local Resident Discount Scheme for users of the Project once it is operational.	**Charging rationale** The decision to require eligible road users to pay a charge to use the tunnel section of the Project is in line with paragraph 3.25 of the National Policy Statement for National Networks (Department for Transport, 2014). Without prejudice to any decision by the Secretary of State on the grant of development consent, the Department for Transport has reviewed details of the proposed road user charging regime for the Project and has confirmed that they are in line with government policy. The Road User Charging Statement [**Application Document APP-517**] explains the road user charging powers that are being sought through the draft DCO [**Additional Submission AS-038**]. This includes an explanation of why charges are considered necessary, how they would be set and how they would be enforced. **Local Residents' Discount Scheme** The Road User Charging Statement [**Application Document APP-517**] sets out the proposal for residents who pay their council tax to Gravesham Borough Council or Thurrock Council to benefit from a Local Residents' Discount Scheme (LRDS), offering similar reductions in crossing charges of a similar type to those currently in operation at the Dartford Crossing. The proposal aligns with the Dartford Crossing LRDS by limiting eligibility to residents of local authorities in which the tunnel portals would be situated.

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3.13 Traffic and Economics

Introduction

3.13.1 A total of 121 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Traffic and Economics.

3.13.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-038 2.10 Traffic Regulation Measures Plans (Volume A) (Key Plan)

b. APP-039 2.10 Traffic Regulation Measures Plans (Volume B) (Sheets 1 to 20)

c. APP-040 2.10 Traffic Regulation Measures Plans (Volume C) (Sheets 21 to 49)

d. APP-064 5.1 Consultation Report - Part 1 of 6

e. APP-143 6.1 Environmental Statement - Chapter 5 - Air Quality

f. APP-150 6.1 Environmental Statement - Chapter 12 - Noise and Vibration

g. APP-315 6.2 Environmental Statement - Figure 12.7 - Opening Year Noise Change Contour (DSOY minus DMOY)

h. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

i. APP-343 6.3 Environmental Statement - Appendix 4.4 - Traffic and Transport

j. APP-386 6.3 Environmental Statement - Appendix 7.11 - Traffic and Noise Effects on the Kent Downs Area of Outstanding Natural Beauty

k. APP-450 6.3 Environmental Statement - Appendix 12.10 - Road Traffic Noise Mitigation and Cost Benefit Analysis

l. APP-338 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan - Annex B - Outline Materials Handling Plan

m. APP-486 6.4 Environmental Statement - Non-Technical Summary (NTS)

n. APP-494 7.1 Need for the Project

o. APP-495 7.2 Planning Statement

p. APP-505 7.3 Section 106 Agreements – Heads of Terms

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q. APP-518 7.7 Combined Modelling and Appraisal Report

r. APP-519 7.7 Combined Modelling and Appraisal Report - Appendix A - Transport Data Package

s. APP-520 7.7 Combined Modelling and Appraisal Report - Appendix B - Transport Model Package

t. APP-521 7.7 Combined Modelling and Appraisal Report - Appendix B - Transport Model Package Annexes

u. APP-522 7.7 Combined Modelling and Appraisal Report – Appendix C – Transport Forecasting Package

v. APP-523 7.7 Combined Modelling and Appraisal Report - Appendix C - Transport Forecasting Package Annexes

w. APP-524 7.7 Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Appraisal Summary Table Report

x. APP-525 7.7 Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Distributional Impact Appraisal Report

y. APP-526 7.7 Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Economic Appraisal Report

z. APP-527 7.7 Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Level 3 Wider Economic Impacts Report

aa. APP-528 7.8 Traffic Forecasts Non-Technical Summary

bb. APP-529 7.9 Transport Assessment

cc. APP-530 7.9 Transport Assessment - Appendix A - Public Rights of Way

dd. APP-531 7.9 Transport Assessment - Appendix B - Journey Time Changes 2030

ee. APP-532 7.9 Transport Assessment - Appendix C - Journey Time Changes 2045

ff. APP-533 7.9 Transport Assessment - Appendix D - Scale of Impacts Maps

gg. APP-534 7.9 Transport Assessment - Appendix E - Construction Traffic Assessment Supporting Information

hh. APP-535 7.9 Transport Assessment - Appendix F - Wider Network Impacts Management and Monitoring Policy Compliance

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ii. APP-536 7.9 Transport Assessment - Appendix G - Construction Percentage Change in Flows by Phase

jj. APP-537 7.9 Transport Assessment - Appendix H - Construction Journey Time Maps

kk. APP-538 7.9 Transport Assessment - Appendix I - Policy Compliance

ll. APP-539 7.10 Health and Equalities Impact Assessment

mm. APP-545 7.12 Wider Network Impacts Management and Monitoring Plan

nn. APP-546 7.13 Framework Construction Travel Plan

oo. APP-547 7.14 Outline Traffic Management Plan for Construction

pp. APP-553 7.20 Benefits and Outcomes Document

qq. AS-038 3.1 Draft Development Consent Order

Table 3.12 Summary of issues raised in RRs concerning Traffic and Economics, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Concerns regarding the Applicant's traffic modelling, including suggestions that congestion on roads would eventually exceed estimates, that the Project would cause congestion on local roads and junctions, with specific concerns about the A1089 and the Orsett Cock junction, and that predicted time savings resulting from the Project are overstated.	The Applicant's traffic modelling has been carried out in accordance with the transport analysis guidance from the Department for Transport (DfT) (2021b) and using data available from 2016. Due to changes in traffic flows as a result of the COVID-19 pandemic, data from after 2019 would not have been suitable for the Applicant's traffic modelling. The traffic model data is collated and used in accordance with DfT guidance. With regards to congestion and time savings, the Applicant's traffic modelling uses the most up-to-date Government guidance at the time of submission, which means opportunities for underestimating traffic flows are minimised and the predictions provide a robust basis upon which to design the Project for expected requirements on opening and for future usage. The Applicant's transport model covers in detail the roads in Kent, Thurrock, Essex and Havering, as well as the eastern part of Greater London, extending out to major roads within the area around the entire M25, and including a wider road network that extends across the whole of England, Scotland and Wales. This area is appropriate because it models all of the primary roads likely to be affected by the Project. While the modelling includes forecasts for some minor roads, it is outside the scope of this type of strategic modelling to provide street-by-street predictions of how traffic flows would change once the Project is operational. For more information about how the Applicant has carried out traffic modelling following industry best practice, see Combined Modelling and Appraisal Report [**Application Document APP-518**], including Appendices A, B and C [**Application Documents APP-519** to

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	APP-523]. A summary of the methodology is included in Traffic Forecasts Non-Technical Summary [**Application Document APP-528**]. **Network performance** The traffic modelling submitted as part of the application for development consent forecasts that, compared with the situation without the Project, the traffic using the Dartford Crossing would fall by an average of 19% in the peak hours in 2030 and remain below current levels for the foreseeable future. Overall, the transport benefits of the Project clearly and significantly outweigh the negative impacts on the road network, with the Project fulfilling the Scheme Objective to relieve the congested Dartford Crossing and approach roads, improving their performance by providing additional free-flowing north-south capacity across the River Thames. For more information about the Scheme Objectives, see the Need for the Project [**Application Document APP-494**]. While there would be negative impacts on traffic flow in some locations, the Applicant considers that no additional interventions are necessary beyond the proposals presented in the application for development consent. For more information about the impacts on the strategic road network (SRN) and local roads, see the Traffic Forecasts Non-Technical Summary [**Application Document APP-528**], which provides an overview of the impacts of the Project on the road network. **Traffic monitoring** The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes. The Applicant consulted on the draft Wider Network Impacts Management and Monitoring Plan (WNIMMP) during the Community Impacts Consultation in July 2021. An updated WNIMMP [**Application Document APP-545**] is included in the application, providing information about the proposed traffic monitoring. The traffic impact monitoring scheme is secured in Schedule 2 of the draft Development Consent Order [**Application Document AS-038**] and would require approval by the Secretary of State, after consultation with relevant local highway authorities. It would begin one year before the tunnel area opens. The Applicant is obligated to work with local highway authorities and others to align national and local plans and investments, balance national and local needs and support better end to end journeys for road users (paragraph 5.19 of Highways England: Licence (DfT, 2015a)). The Applicant will continue to deliver against this obligation in its collaborative work with local authorities.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	For more information about the traffic modelling, see the Combined Modelling and Appraisal Report, with information about the Project benefits in the Economic Appraisal Report, which is Appendix D [**Application Document APP-526**] of the Combined Modelling and Appraisal Report. **Local roads and junctions** The Project would include junctions with key parts of the strategic road network (SRN), namely the A2/M2, A13/A1089 and M25. It would also provide connections to a limited number of local roads via the junctions at Orsett Cock and Gravesend East. While there would be negative impacts on traffic flow in some locations, the Applicant considers that no additional interventions are necessary beyond the proposals presented in the application for development consent. For more information about the impacts on the strategic road network (SRN) and local roads, see the Traffic Forecasts Non-Technical Summary [**Application Document APP-528**]. As a result of new developments within the area, the Applicant identified the need for increased capacity on the road linking the Project to the A13 eastbound and the Orsett Cock junction. An additional lane was added to this link road and consulted on during the Community Impacts Consultation in July 2021. In response to concerns about the rerouting of traffic on to local roads in Thurrock and the lack of direct connectivity to the A1089 southbound from the Orsett Cock junction, the Applicant presented an additional change to the design of the proposed A13/A1089/A122 Lower Thames Crossing junction during the Local Refinement Consultation in May 2022. The revised junction design provides a direct link between the Orsett Cock junction and the A1089 southbound, which also improves connectivity from the A122 northbound and southbound to the A1089. The links that have been provided at the proposed A13/A1089/A122 Lower Thames Crossing junction are those that align best with the Scheme Objectives, based on consideration of the modelling, feedback from stakeholders and costs. Motorists would be unlikely to use the Manorway junction to access the Project because those motorists would be more likely to use the Dartford Crossing, which would be more attractive due to reduced congestion once the Project is operational.
Comments expressing concern that changes and increases in traffic as a result of the Project, including its construction, would adversely affect communities, including by making local travel more difficult, reducing property	To reduce the impacts on local communities, the new road has been routed away from population centres as much as possible. A Health and Equalities Impact Assessment [**Application Document APP-539**] has been prepared, which considers the health impacts on local people and communities, during the construction and operation of the Project. Environmental Statement Appendix 2.2: Code of Construction Practice (CoCP) [**Application Document APP-336**] and the Register of Environmental Actions and Commitments (REAC) (part of the CoCP) set out the Applicant's proposed control and

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
value and increasing noise.	mitigation measures that would limit or avoid impacts on local communities during construction. The actions and commitments in the CoCP and REAC are legally secured through Requirement 4 of Schedule 2 of Part 1 of the draft Development Consent Order (DCO) [**Additional Submission AS-038**] (page 119). **Traffic impacts during construction and operation** The Transport Assessment [**Application Document APP-529**] presents the Project's impact on the strategic and local highway networks, road safety, and local sustainable modes of transport, including public transport. It also sets out the impact of construction on the road network, including changes to existing traffic patterns as a result of predicted construction traffic movements and temporary traffic management measures. Measures to reduce and manage the impact of the Project's construction on the road network would be secured through the Framework Construction Travel Plan [**Application Document APP-546**], the outline Materials Handling Plan [**Application Document APP-338**] and the outline Traffic Management Plan for Construction [**Application Document APP-547**] which are secured through Requirements 10 and 11 of Part 1 of Schedule 2 of the draft DCO [**Additional Submission AS-038**]. These control documents require the preparation of traffic management plans for construction and construction travel plans prior to the commencement of works. Once the Project is operational, the Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks, as set out in Chapter 1 of the Wider Network Impacts Management and Monitoring Plan [**Application Document APP-545**]. If the monitoring identifies issues or opportunities related to the road network resulting from traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes. The traffic impact monitoring scheme is secured in Schedule 2 of the draft Development Consent Order [**Additional Submission AS-038**] and would require approval by the Secretary of State, after consultation with relevant local highway authorities, which would begin one year before the tunnel area opens. **Improvements to local journeys** Once the Project is operational, road users in Kent who travel along parts of the A2, M25 and M20, and who use the Dartford Crossing and its approach roads, are forecast to experience quicker journeys and reduced congestion as a result of the Project. There would be benefits to journey times for local people and significant benefits on jobs and training opportunities; walking, cycling and horse-riding routes; as well as access to new areas of recreational land at Chalk Park and Tilbury Fields. There would be negative impacts on some other journey times, although the

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	positive traffic impacts of the Project would significantly outweigh the negatives. **Property values** Where property values would be affected by the Project, owners may claim for compensation in accordance with the Compensation Code. Further information about the compensation offered to those affected by the Project can be found in the Compulsory Purchase and Compensation booklet 2: Compensation to Business Owners and Occupiers and Compulsory Purchase and Compensation booklet 4: Compensation to Residential Owners and Occupiers. The Benefits and Outcomes Document [**Application Document APP-553**] provides a framework to communicate what is being delivered within the Project and some of the wider activities undertaken by the Applicant (both already and planned for the future) in the local area of the Project to support local people and the environment. **Noise** Using higher-performing surfacing for some of the Project's new and upgraded trunk roads and slip roads would reduce predicted noise by up to 7.5dB(A). In other areas, low noise surfacing is proposed where traffic speeds are greater than 75km/h, and this would reduce predicted road traffic noise levels by up to 3.5dB(A). For more information about the proposed low-noise road surfacing (including locations) and other noise mitigation, see ES Chapter 12: Noise and Vibration [**Application Document APP-150**] and ES Figure 12.6: Operational Road Traffic Noise Mitigation [**Application Document APP-314**].
Comments expressing concern over the predicted level of economic benefits generated by the Project, with the view that these have been overestimated in the Application.	Users of the Dartford Crossing and approach roads are forecast to experience journey time benefits and reduced congestion due to the Project. The improved connectivity would boost the productivity of local businesses in the long-term. The Applicant is working with stakeholders and intends to provide opportunities for local people to work on the construction and operation of the route and help local businesses form part of the supply chain that would build and operate the route. Steps being taken to deliver economic benefits for the local community include new skills and training for local residents during the construction phase, work placements and careers advice for local students, a pre-employment support programme for long-term unemployed, and support for local business leaders to bid for this and the future pipeline of investment in the region. See Section 7.10 and Table 7.38 of the HEqIA [**Application Document APP-539**]. In addition, the Skills, Education and Employment Strategy is included within the Section 106 Agreements – Heads of Terms document [**Application Document APP-505**]. With regards to economic benefits to the area, the Project aligns with the South East Local Enterprise Partnership (SELEP) strategy regional economic growth. Communities in the region are forecast

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	to receive substantial transport user benefits, which are mainly journey-time savings and productivity benefits. The Project's economic appraisal follows the government guidance set out in the transport analysis guidance (Department for Transport, 2021b). For further information on the economic benefits of the Project and Scheme Objectives, see the Need for the Project [**Application Document APP-494**] and the Economic Appraisal Report – Combined Modelling and Appraisal Report, Appendix D [**Application Document APP-526**]. The Appraisal Summary Table within the Economic Appraisal Package, Appendix D [**Application Document APP-524**] summarises the Project's cost and benefits, while the Economic Appraisal Report provides more information about the appraisal methods and results. The Benefits and Outcomes Document [**Application Document APP-553**] provides a framework to communicate what is being delivered within the Project and some of the wider activities undertaken by the Applicant (both already and planned for the future) in the local area of the Project to support local people and the environment.
Concerns about the impact of additional housing in the vicinity of the Project on traffic, including suggestions that some future developments are not included in modelling and that growth assumptions are lower than needed in some areas.	The Applicant's transport modelling includes growth capped in line with DfT NTEM traffic forecasts, as published in TEMPro 7.2. The growth is spatially adjusted to account for development identified in the Uncertainty Log, which includes development under construction, with a planning application or permission. The Applicant's traffic modelling forecasts also take account of highway scheme assumptions supplied by highway authorities. Information about which developments have been included in the Uncertainty Log can be found in the Transport Forecasting Package, which is Appendix C of the Combined Modelling and Appraisal Report (ComMA) [**Application Document APP-522**]. As the Project has developed over time, the traffic modelling has been updated to account for the latest design changes, as well as the most up to date data at the time of submission, and in line with DfT guidance as set out in the ComMA [**Application Document APP-522**]. Alternative scenarios (high and low growth), in line with transport analysis guidance (TAG), have been undertaken for the Project. Chapter 4 of ComMA Appendix C: Transport Forecasting Package [**Application Document APP-522**] includes details of the High and Low growth scenarios, the results of which are presented within Chapter 7 of the Transport Assessment [**Application Document APP-529**]. The high growth scenario assesses the impact of the Project on the road network with a higher level of growth than is present in the core scenario.
Concerns expressed about the methods used by the Applicant to quantify economic benefits of the Project,	The appraisal undertaken is fully in line with DfT's transport analysis guidance and demonstrates that the Project would provide positive value for money. This is summarised within the Combined Modelling and Appraisal Report (ComMA) [**Application Document**

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
and a suggestion that the stated benefit-cost ratio is too low.	APP-518] and in more detail within ComMA Appendix D [**Application Document** APP-524 to APP-527]. A reliability appraisal is contained within Section 9.2 of the Combined Modelling and Appraisal Report Appendix D: Economic Appraisal Package: Economic Appraisal Report [**Application Document** APP-526]. This concludes that the Project would result in £487.1m (in 2010 prices) of reliability benefits for the core traffic growth scenario. Table 9.5 of the Economic Appraisal Report shows that there would be benefits across all of the 10 time periods assessed.

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3.14 Wider Network Impacts

Introduction

3.14.1 A total of 25 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Wider Network Impacts.

3.14.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-494 7.1 Need for the Project

b. APP-528 7.8 Traffic Forecasts Non-Technical Summary

c. APP-535 7.9 Transport Assessment - Appendix F - Wider Network Impacts Management and Monitoring Policy Compliance

d. APP-545 7.12 Wider Network Impacts Management and Monitoring Plan

e. AS-038 3.1 Draft Development Consent Order

Table 3.13 Summary of issues raised in RRs concerning Wider Network Impacts, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern that implementing the Project would have significant impacts on traffic in particular areas, with calls for changes to be made to mitigate these.	The Applicant recognises that, as a result of the Project opening, some people would choose to make different journeys. In many places on the network this would lead to beneficial impacts on the network, and in some cases lead to adverse impacts. Overall, the transport benefits of the Project clearly and significantly outweigh the negative impacts on the road network, with the Project fulfilling the Scheme Objective to relieve the congested Dartford Crossing and approach roads, improving their performance by providing additional free-flowing north-south capacity across the River Thames. For more information about the Scheme Objectives, see the Need for the Project [**Application Document APP-494**]. While there would be negative impacts on traffic flow in some locations, the Applicant considers that no additional interventions are necessary beyond the proposals presented in the application for development consent. For more information about the impacts on the strategic road network (SRN) and local roads, see the Traffic Forecasts Non-Technical Summary [**Application Document APP-528**]. The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities and National Highways would be able to use this as

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	evidence to support scheme development and case making through existing funding mechanisms and processes. The Applicant consulted on the draft Wider Network Impacts Management and Monitoring Plan (WNIMMP) during the Community Impacts Consultation in July 2021. An updated WNIMMP [**Application Document APP-545**] is included in the Development Consent Order application, providing information about the proposed traffic monitoring. The traffic impact monitoring scheme is secured in Schedule 2 of the Draft Development Consent Order [**Application Document AS-038**] and would require approval by the Secretary of State, after consultation with relevant local highway and planning authorities, which would begin one year before the tunnel area opens. The Applicant is obliged to work with local highway authorities and others to align national and local plans and investments, balance national and local needs and support better end-to-end journeys for road users (paragraph 5.19 of Highways England: Licence (Department for Transport, 2015)). The Applicant will continue to deliver against this obligation in its collaborative work with local authorities.

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3.15 Sustainability

Introduction

3.15.1 One IP with whom the Applicant does not have an SoCG raised issues in their RR on the topic of Sustainability.

3.15.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-151 6.1 Environmental Statement - Chapter 13 - Population and Human Health

b. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

c. APP-494 7.1 Need for the Project

d. APP-506 7.4 Project Design Report - Part A - Introduction and Project Background

e. APP-539 7.10 Health and Equalities Impact Assessment

f. APP-544 7.11 Sustainability Statement

g. APP-553 7.20 Benefits and Outcomes Document

Table 3.14 Summary of issues raised in RRs concerning Sustainability, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
A comment expressing concern that the Project is not environmentally sustainable.	The Sustainability Statement [**Application Document APP-544**] recognises the importance of sustainability and sets out the key sustainability themes and outcomes for the Project. The intention is to embed sustainability into the Project through the preliminary design, direct specification, challenging contractors to promote sustainable outcomes or including them in the Register of Environmental Actions and Commitments (REAC). The REAC forms part of Environmental Statement Appendix 2.2: Code of Construction Practice (CoCP) [**Application Document APP-336**]. The Project would also deliver a wide range of environmental and social benefits. These are discussed further in the Need for the Project [**Application Document APP-494**], the Benefits and Outcomes Document [**Application Document APP-553**], the Project Design Report [**Application Documents APP-506** to **APP-515**], Environmental Statement Chapter 13: Population and Human Health [**Application Document APP-151**], and the Health and Equalities Impact Assessment [**Application Document APP-539**].

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3.16 Socio-economics

Introduction

3.16.1 Nine IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Socio-economics.

3.16.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-494 7.1 Need for the Project

b. APP-495 7.2 Planning Statement

c. APP-505 7.3 Section 106 Agreements - Heads of Terms

d. APP-518 7.7 Combined Modelling and Appraisal Report

e. APP-524 7.7 Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Appraisal Summary Table Report

f. APP-525 7.7 Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Distributional Impact Appraisal Report

g. APP-526 7.7 Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Economic Appraisal Report

h. APP-527 7.7 Combined Modelling and Appraisal Report - Appendix D - Economic Appraisal Package: Level 3 Wider Economic Impacts Report

i. APP-539 7.10 Health and Equalities Impact Assessment

j. APP-544 7.11 Sustainability Statement

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Table 3.15 Summary of issues raised in RRs concerning Socio-economics, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments on the subject of community benefits arising from the Project, including concerns that there would be no such benefits as well as requests to maximise any opportunities to generate them.	The benefits and outcomes that are to be delivered and secured by the Project and through the DCO are set out in a range of documents provided as part of the application for development consent. The Combined Modelling and Appraisal Report (ComMA) Appendix D [**Application Documents APP-524** to **APP-527**] includes the Economic Appraisal Report (EAR) [**Application Document APP-526**] and the Wider Economic Impacts Report [**Application Document APP-527**]. Together, these set out the benefits of the Project which have been calculated using the Department for Transport's transport analysis guidance (TAG). The Combined Modelling and Appraisal Report, Chapter 7 [**Application Document APP-518**] provides a summary of how the benefits and disbenefits of the Project have been evaluated and quantified across a series of different themes, including transport user benefits, environmental impacts and wider economic impacts. The Project would deliver a range of other planning policy, environmental and sustainability objectives. These are set out in a number of documents, including the Need for the Project [**Application Document APP-494**], the Planning Statement [**Application Document APP-495**], and the Sustainability Statement [**Application Document APP-544**]. Appendix B of Section 106 Agreements – Heads of Terms [**Application Document APP-505**] includes a Skills, Education and Employment Strategy. The document describes the Applicant's commitment to two community funds which provides a mechanism to address some of the residual impacts of the Project: • Community Fund (South) - £0.63 million to be administered by the Kent Community Foundation • Community Fund (North) - £1.26 million to be administered by the Essex Community Foundation. The document sets out the proposed criteria for valid applications for funds, for example that applicants must be a registered charity, voluntary organisation, social enterprise or public body.
Comments on the subject of jobs, training and apprenticeships linked to the construction and operation of the Project, including concerns that the Applicant's plans in that regard lack substance.	Section 7.10 of the HEqIA [**Application Document APP-539**] summarises the Skills, Education and Employment (SEE) Strategy for the Project and the minimum targets for skills, training and apprenticeships that it is expected the Project would facilitate. Table 7.38 of the HEqIA sets out a series of specific targets, for example, a minimum of 437 apprenticeships; sector skills qualifications for 500 people; and training for 350 people from local communities.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	The SEE strategy itself is contained within Appendix B of Section 106 Agreements – Heads of Terms [**Application Document APP-505**].
Comments stressing the importance of giving local businesses opportunities to be involved in the Project.	Paragraph 7.10.19 of the HEqIA [**Application Document APP-539**] identifies the overarching objectives of the Skills Education and Employment Strategy for the Project which aims to: • Create a skills legacy • Bring people closer to jobs • Inspire future careers • Support business growth On the last point, paragraph 7.10.19(d) notes: '*Support business growth – provide local businesses and Small and Medium sized Enterprises (SMEs) with the tools to win new work and maximise economic benefits during and after construction. This includes providing training and mentoring to local businesses, supporting enabling agencies such as local authorities to use the Project as an opportunity to boost growth and mentoring activities to ensure value can be demonstrated to communities and the local economy.*' These measures would be secured through the Section 106 Agreements – Heads of Terms [**Application Document APP-505**].

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3.17 EIA Methodology

Introduction

3.17.1 Four IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of the EIA Methodology.

3.17.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-138 6.1 Environmental Statement - Glossary and Acronyms for the Environmental Statement

b. APP-141 6.1 Environmental Statement - Chapter 3 – Assessment of Reasonable Alternatives

c. APP-142 6.1 Environmental Statement - Chapter 4 - EIA Methodology

d. APP-343 6.3 Environmental Statement - Appendix 4.4 - Traffic and Transport

e. APP-344 6.3 Environmental Statement - Appendix 4.5 - EIA Methodology Policy

f. APP-495 7.2 Planning Statement

g. APP-496 7.2 Planning Statement – Appendix A – National Policy Statement for National Networks (NPSNN) Accordance Table

h. APP-497 7.2 Planning Statement – Appendix B – National Policy Statements for Energy Infrastructure Accordance Tables

i. APP-506 to APP-515 7.4 Project Design Report

Table 3.16 Summary of issues raised in RRs concerning the EIA Methodology, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
A comment expressing concern that the Applicant has failed to adequately consider reasonable alternatives to the current proposals, as required by the Environmental Impact Assessment process.	As required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations), the Applicant has considered reasonable alternatives to the Project, and these are detailed in Environmental Statement (ES) Chapter 3: Assessment of Reasonable Alternatives [**Application Document APP-141**]. The chapter identifies the reasonable alternatives considered, summarises the findings of the environmental assessments of those alternatives, and describes the reasons for their adoption or rejection by the Project. The chapter also includes details of reappraisal work carried out to check the ongoing validity of those decisions as time has passed.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	Full details of the decision-making process that led to the identification of the preferred route are included within Chapter 5 of the Planning Statement [**Application Document APP-495**]. Both documents consider how alternatives to the Project were considered (in terms of different modal alternatives) and the 'do nothing' alternative as well as different route options to the preferred route and Project design options. The Project Design Report [**Application Documents APP-506 to APP-515**] details the consideration of alternatives in the detailed design and options for individual elements of the Project and how the design changed over time in response to the various rounds of public consultation on the Project. Appendix A to the Planning Statement [**Application Document APP-496**] and Appendix B [**Application Document APP-497**] set out how the Project accords with the relevant requirements of the NPSNN and relevant Energy NPSs (respectively) in terms of the legal and policy requirements regarding the consideration of alternatives.
Comments expressing concern that the Applicant has not properly considered certain impacts in line with the requirements of an Environmental Impact Assessment or has carried out those assessments inadequately.	Environmental Statement (ES) Chapter 4: EIA Methodology [**Application Document APP-142**], describes the general approach followed for the Environmental Impact Assessment (EIA) of the Project, which has been undertaken in accordance with the relevant National Policy Statements and in line with the requirements of the Design Manual for Roads and Bridges (DMRB) and relevant guidance. More detailed methodologies are provided in the respective environmental topic chapters of the ES. The assessments presented in the ES have been undertaken in accordance with relevant national, regional, and local plans and policies. National policies relevant to the EIA methodology are presented in ES Appendix 4.5: EIA Methodology Policy [**Application Document APP-344**], Table 1.1 and Table 1.2, along with the Project's response to these requirements. European Community Directive 85/337/EEC (EIA Directive) sets out the requirements for the preparation of an EIA for certain types of projects where they are likely to have significant effects on the environment. The original 1985 Directive has been amended three times and those amendments were codified in Directive 2011/92/EU and Directive 2014/52/EU. This forms the EIA regime in Europe and is transposed into UK law for Nationally Significant Infrastructure Projects (NSIPs) in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). The requirement for EIA is set out in Schedule 1 of the EIA Regulations (which continue to have effect under section 2(1) of the European Union (Withdrawal) Act 2018). On the basis that the Project consists of approximately 23km of new road comprising four or more lanes, it is a Schedule 1 development as defined by the EIA Regulations and requires an EIA.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	The National Policy Statements (NPSs) set out the policies that will be used by the Secretary of State to make a decision on the application in accordance with the Planning Act 2008. An assessment of compliance with all relevant NPS policies is set out in Planning Statement, Appendix A: National Policy Statement for National Networks (NPSNN) Accordance Table [**Application Document APP-496**]. With regard to the reporting of impacts on transport within the ES, the approach adopted in the application is in line with the DMRB. This is explained in Section 4.11 of ES Chapter 4: EIA Methodology [**Application Document APP-142**]. The effects of transport and traffic are already covered within the scope of other assessments presented as part of the Development Consent Order (DCO) application. There is no flaw in process. ES Appendix 4.4: Traffic and Transport [**Application Document APP-343**] explains and signposts to relevant sections of the DCO Application Documents where the environmental assessment of traffic and transport impacts are presented.

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3.18 Air Quality

Introduction

3.18.1 A total of 156 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Air Quality.

3.18.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. AS-038 3.1 Draft Development Consent Order

b. APP-143 6.1 Environmental Statement - Chapter 5 - Air Quality

c. APP-146 6.1 Environmental Statement – Chapter 8 – Terrestrial Biodiversity

d. APP-170 6.2 Environmental Statement - Figure 5.1 - Construction Dust Study Area

e. APP-171 6.2 Environmental Statement - Figure 5.2 - Construction Traffic Study Area

f. APP-172 6.2 Environmental Statement - Figure 5.3 - Operational Study Area (1 of 3)

g. APP-173 6.2 Environmental Statement - Figure 5.3 - Operational Study Area (2 of 3)

h. APP-174 6.2 Environmental Statement - Figure 5.3 - Operational Study Area (3 of 3)

i. APP-175 6.2 Environmental Statement - Figure 5.4 - Air Quality Monitoring Sites and 2016 Annual Mean Data (1 of 3)

j. APP-176 6.2 Environmental Statement - Figure 5.4 - Air Quality Monitoring Sites and 2016 Annual Mean Data (2 of 3)

k. APP-177 6.2 Environmental Statement - Figure 5.4 - Air Quality Monitoring Sites and 2016 Annual Mean Data (3 of 3)

l. APP-178 6.2 Environmental Statement - Figure 5.5 - Construction Traffic Receptors and Results (1 of 2)

m. APP-179 6.2 Environmental Statement - Figure 5.5 - Construction Traffic Receptors and Results (2 of 2)

n. APP-180 6.2 Environmental Statement - Figure 5.6 - Operational Phase Receptors and Results (1 of 4)

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o. APP-181 6.2 Environmental Statement - Figure 5.6 - Operational Phase Receptors and Results (2 of 4)

p. APP-182 6.2 Environmental Statement - Figure 5.6 - Operational Phase Receptors and Results (3 of 4)

q. APP-183 6.2 Environmental Statement - Figure 5.6 - Operational Phase Receptors and Results (4 of 4)

r. APP-184 6.2 Environmental Statement - Figure 5.7 - PCM Links in Construction and Operational Study Area

s. APP-403 to APP-406 6.3 Environmental Statement – Appendix 8.14 – Designated Sites Air Quality Assessment

t. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

u. APP-345 6.3 Environmental Statement - Appendix 5.1 - Air Quality Methodology

v. APP-346 6.3 Environmental Statement - Appendix 5.2 - Air Quality Baseline Conditions

w. APP-347 6.3 Environmental Statement - Appendix 5.3 - Air Quality Construction Phase Results

x. APP-348 6.3 Environmental Statement - Appendix 5.4 - Air Quality Operational Phase Results

y. APP-349 6.3 Environmental Statement - Appendix 5.5 - Air Quality Legislation and Policy

z. APP-350 6.3 Environmental Statement - Appendix 5.6 - Project Air Quality Action Plan

aa. APP-539 7.10 Health and Equalities Impact Assessment

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Table 3.17 Summary of issues raised in RRs concerning Air Quality, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern over the reliability or scope of the Applicant's air quality assessments, challenging data and assumptions regarding the height of the road relative to receptors, and requesting further analysis, particularly with regard to World Health Organization (WHO) $PM_{2.5}$ limits. There were also concerns about what air quality monitoring would take place, if any, during the construction and operational phases.	ES Chapter 5: Air Quality [**Application Document APP-143**] includes an assessment of the predicted changes to local air quality as a result of the Project. Standards and guidance used in devising the methodology for data collection and assessment of air quality impacts include the Design Manual for Roads and Bridges, technical guidance from Defra, the Institute of Air Quality Management, and the Greater London Authority. In addition, the air quality model has been verified against 241 monitoring sites to establish a reliable air quality baseline. The assessment methodology is described in ES Appendix 5.1: Air Quality Methodology [**Application Document APP-345**] and has been undertaken in line with Local Air Quality Management Technical Guidance (Defra, 2022). Terrain is not included in the air quality model, and all roads are assumed to be at 0m height across the model study area with human receptor heights assumed to be 1.5m (average respirable height). The assessments assume this road height because this represents the worst-case scenario in terms of exposure to emissions. The assessment of air quality effects from the Project also takes into consideration the impacts of using machinery and river vessels during construction. Paragraphs 5.6.48 to 5.6.112 of ES Chapter 5: Air Quality [**Application Document APP-143**] include a discussion of the air quality impacts on human receptors, focused specifically at receptors where Air Quality Strategy (AQS) objectives are not exceeded. The air quality baseline conditions have been established based on desk-based studies, monitoring and modelling, including the impacts from both construction and operation. A summary of the air quality monitoring data used to inform the operational and construction phase air quality assessments is presented in ES Appendix 5.2: Air Quality Baseline Conditions [**Application Document APP-346**]. **Survey data** An additional survey was undertaken to address gaps in air quality monitoring data near roads likely to be affected by the Project. A total of 94 NO_2 diffusion tubes were installed in the assessment study area, covering various periods from January 2018 to December 2019, as described in ES Appendix 5.1: Air Quality Methodology [**Application Document APP-345**]. **Assessment of $PM_{2.5}$** The WHO air quality guidelines are neither standards nor legally binding criteria. They are designed to offer guidance on reducing the health impacts of air pollution which world

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	governments can use to inform air quality policy based on their own specific circumstances. The WHO guidelines have not been adopted as legal thresholds in the UK and so it would not be appropriate to consider these in the Project air quality assessment. The targets for particulate matter where particles are less than 2.5 micrometres in diameter ($PM_{2.5}$) as set out in the Environment Act 2021 and the Environment Improvement Plan, were enacted following the submission of the Development Consent Order (DCO). It is currently not possible to determine how the Project would affect compliance with the $PM_{2.5}$ targets as there is no guidance from Defra on how the targets should be considered in the planning process. The air quality assessment reported in ES Chapter 5: Air Quality [**Application Document APP-143**] demonstrates that the Project would comply with the current legal thresholds for $PM_{2.5}$. Air quality modelling confirmed that there would be no exceedances of the annual mean $PM_{2.5}$ AQS objective of 25µg/m^3 and the annual mean $PM_{2.5}$ Limit Value of 20µg/m^3 across the study area in both the Do-Minimum and Do-Something scenarios of the construction and operational phases. **Air quality monitoring** The REAC, which forms part of ES Appendix 2.2: CoCP [**Application Document APP-336**], documents the monitoring that would be required during the construction phase. The requirements for air quality monitoring are outlined in REAC Ref. AQ006. The Project does not require mitigation for operational air quality effects for human health, therefore the Applicant is not proposing to include operational monitoring. Additional information on the assessments and monitoring can be found in ES Chapter 5: Air Quality [**Application Document APP-143**], and subsequent appendices including ES Appendix 5.1: Air Quality Methodology [**Application Document APP-345**].
Comments expressing concern about air quality worsening as a result of the Project (both during construction and operation), that air quality is already poor in local areas, and querying the summary provided by the Applicant of air quality impacts on human receptors.	Information about the air quality impacts of the Project in the assessed local areas is presented in ES Chapter 5: Air Quality [**Application Document APP-143**]. The assessments have demonstrated that there would be no likely significant effects on air quality during construction of the Project. During operation, the assessments demonstrate that there would be no likely significant effects in relation to human health and compliance with relevant air quality "Limit Values". The Project is considered to have a significant effect on designated sites and habitats for ecology because of an increase in nitrogen deposition. These are reported in ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] and ES Appendix 8.14: Designated Sites Air Quality

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	Assessment [**Application Documents APP-403; APP-404; APP-405; APP-406**]. The Project has been designed to reduce impacts on air quality wherever practicable, such as by ensuring the road largely avoids built-up areas, where the existing air quality tends to be worse, and by minimising gradients and providing free-flowing journeys. Measures to mitigate the impact of construction on air quality, such as dust suppression and implementation of minimum emission standards to reduce emissions from vehicles and construction machinery, are included in ES Appendix 2.2: CoCP [**Application Document APP-336**]. The Register of Environmental Actions and Commitments (REAC), which forms part of ES Appendix 2.2: CoCP [**Application Document APP-336**], documents the monitoring that would be required during the construction phase. The requirements for air quality monitoring are outlined in REAC Ref. AQ006.
Comment expressing concern that it may not be possible to mitigate negative air quality effects.	Measures to mitigate the impact of construction of the Project on air quality, such as dust suppression and implementation of minimum emission standards to reduce emissions from vehicles and construction machinery, are included in ES Appendix 2.2: Code of Construction Practice [**Application Document APP-336**]. These measures are legally secured through the draft DCO [**Additional Submission AS-038**]. Given there are no significant adverse impacts on air quality in relation to human health receptors, from the Project during operation, then no mitigation for air quality effects is required.
Comments expressing concern about Project air quality effects on current ULEZ and on future broadening of the area.	The Ultra Low Emissions Zone (ULEZ) is due to expand to cover all London boroughs from August 2023. All sections of the Project within Greater London would meet the emissions guidelines set by the Mayor of London.
Comments expressing concern regarding air quality impacts on local schools and communities, particularly the respiratory effects on children.	The Health and Equality Impact Assessment (HEqIA) [**Application Document APP-539**] considers the health impacts on local people and communities, including those protected by equality legislation, children and schools, during the construction and operation of the Project. The HEqIA describes the likely impacts of changes to air quality on health.

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3.19 Cultural Heritage

Introduction

3.19.1 Eight IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Cultural Heritage.

3.19.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. AS-038 3.1 Draft Development Consent Order

b. APP-185 6.2 Environmental Statement - Figure 6.1 - Archaeological Baseline and Assets Assessed as Likely to Experience an Effect (1 of 3)

c. APP-186 6.2 Environmental Statement - Figure 6.1 - Archaeological Baseline and Assets Assessed as Likely to Experience an Effect (2 of 3)

d. APP-187 6.2 Environmental Statement - Figure 6.1 - Archaeological Baseline and Assets Assessed as Likely to Experience an Effect (3 of 3)

e. APP-188 6.2 Environmental Statement - Figure 6.2 - Built Heritage Baseline and Assets Assessed as Likely to Experience an Effect

f. APP-189 6.2 Environmental Statement - Figure 6.3 - Historic landscape

g. APP-190 6.2 Environmental Statement - Figure 6.4 - Geophysical and Aerial Mapping Survey Results

h. APP-191 6.2 Environmental Statement - Figure 6.5 - Location of Representative Heritage Viewpoints

i. APP-192 6.2 Environmental Statement - Figure 6.6 - Representative Heritage Viewpoints (1 of 2)

j. APP-193 6.2 Environmental Statement - Figure 6.6 - Representative Heritage Viewpoints (2 of 2)

k. APP-194 6.2 Environmental Statement - Figure 6.7 - Archaeological Trial Trench Evaluation Carried Out by LTC

l. APP-195 6.2 Environmental Statement - Figure 6.8 - Archaeology and Geology

m. APP-196 6.2 Environmental Statement - Figure 6.9 - Palaeolithic Archaeology

n. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

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o. APP-351 6.3 Environmental Statement - Appendix 6.1 - Cultural Heritage Desk-based Assessment (1 of 4)

p. APP-352 6.3 Environmental Statement - Appendix 6.1 - Cultural Heritage Desk-based Assessment (2 of 4)

q. APP-353 6.3 Environmental Statement - Appendix 6.1 - Cultural Heritage Desk-based Assessment (3 of 4)

r. APP-354 6.3 Environmental Statement - Appendix 6.1 - Cultural Heritage Desk-based Assessment (4 of 4)

s. APP-355 6.3 Environmental Statement - Appendix 6.2 - Aerial Investigation and Mapping Report

t. APP-356 6.3 Environmental Statement - Appendix 6.3 - Archaeological Desk-Based Assessment of 20th Century Military Archaeology

u. APP-357 6.3 Environmental Statement - Appendix 6.4 - Coastal Fortifications Statements of Significance

v. APP-358 6.3 Environmental Statement - Appendix 6.5 - Lower Thames Crossing - Palaeolithic and Quaternary Deposit Model (PQDM) and Desk-based Assessment of Palaeolithic Potential

w. APP-359 6.3 Environmental Statement - Appendix 6.6 - Lower Thames Crossing - Standalone Palaeolithic Archaeological Assessment and Research Framework (SPAA-&-RF)

x. AS-051 6.3 Environmental Statement - Appendix 6.7 - Geophysical Survey Reports (1 of 2) (Version 2) - Accepted at the discretion of the Examining Authority

y. APP-361 6.3 Environmental Statement - Appendix 6.7 - Geophysical Survey Reports (2 of 2)

z. APP-362 6.3 Environmental Statement - Appendix 6.8 - Trial Trenching Reports - Volume A (1 of 5)

aa. APP-363 6.3 Environmental Statement - Appendix 6.8 - Trial Trenching Reports - Volume B (2 of 5)

bb. APP-364 6.3 Environmental Statement - Appendix 6.8 - Trial Trenching Reports - Volume C (3 of 5)

cc. APP-365 6.3 Environmental Statement - Appendix 6.8 - Trial Trenching Reports - Volume D (4 of 5)

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dd. APP-366 6.3 Environmental Statement - Appendix 6.8 - Trial Trenching Reports - Volume E (5 of 5)

ee. APP-367 6.3 Environmental Statement - Appendix 6.9 - Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation

ff. APP-368 6.3 Environmental Statement - Appendix 6.10 - Assessment Tables

gg. APP-369 6.3 Environmental Statement - Appendix 6.11 - Scheme wide Written Scheme of Investigation for Trial Trenching south of the River Thames

hh. APP-370 6.3 Environmental Statement - Appendix 6.12 - Scheme-wide Written Scheme of Investigation for Trial Trenching north of the River Thames

ii. APP-371 6.3 Environmental Statement - Appendix 6.13 - Holocene Geoarchaeological Desk-based Assessment of the Route of the Lower Thames Crossing

jj. APP-372 6.3 Environmental Statement - Appendix 6.14 - Timeline

kk. APP-373 6.3 Environmental Statement - Appendix 6.15 - Master Gazetteer of Heritage Assets

ll. APP-374 6.3 Environmental Statement - Appendix 6.16 - Historic Buildings Recording

mm. APP-375 6.3 Environmental Statement - Appendix 6.17 - Cultural Heritage Legislation and Policy

nn. APP-486 6.4 Environmental Statement - Non-Technical Summary (NTS)

oo. APP-516 7.5 Design Principles

pp. AS-044 6.1 Environmental Statement - Chapter 6 - Cultural Heritage

qq. AS-052 6.3 Environmental Statement - Appendix 6.10 - Assessment Tables

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Table 3.18 Summary of issues raised in RRs concerning Cultural Heritage, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern regarding negative impacts on land that has been deemed archaeologically significant, including Bronze Age barrows and ring ditches near Shorne.	Section 6.4 of ES Chapter 6: Cultural Heritage [**Additional Submission AS-044**] sets out the baseline conditions in the vicinity of the Project. Section 6.6 presents the impacts from the Project (see paragraphs 6.6.48 to 6.6.68 for permanent significant impacts south of the River Thames). This confirms there are 45 heritage assets of archaeological interest being removed by the Project including four Bronze Age barrows. These impacts would be mitigated by archaeological excavation and recording (REAC Ref. CH001; AMS-OWSI No. 4).See paragraphs 6.6.69 – 6.6.100 for non-significant effects south of the River Thames, which describes permanent non-significant effects to a further 109 assets of archaeological interest and, where appropriate, the mitigation for these impacts.
A comment seeking reassurance that the proposed mitigations intended to preserve heritage assets during construction and operation would be implemented as set out in the Application.	The commitments to mitigation made in the Application Documents such as ES Appendix 2.2: Code of Construction Practice (CoCP) [**Application Document APP-336**], including the Register of Environmental Actions and Commitments (REAC), and ES Appendix 6.9: Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [**Application Document APP-367**] would be legally binding under the terms of the various requirements set out in Part 1 of Schedule 2 of the draft Development Consent Order [**Additional Submission AS-038**]. These commitments include measures to preserve heritage assets that have been identified and assessed by the Applicant. These measures include provision for rigorous controls on what the Applicant and appointed Contractors are allowed to do during the construction phase and once the Project is operational.

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3.20 Landscape and Visual

Introduction

3.20.1 A total of 39 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Landscape and Visual.

3.20.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-016 2.5 General Arrangement Plans (Volume B) (Sheets 1 to 20)

b. APP-017 2.5 General Arrangement Plans (Volume C) (Sheets 21 to 49)

c. APP-030 2.9 Engineering Drawings and Sections (Volume A) (A122 LTC Plan and Profiles)

d. APP-031 2.9 Engineering Drawings and Sections (Volume B) (A122 LTC Cross Sections)

e. APP-032 2.9 Engineering Drawings and Sections (Volume C) (A2 M2 and A2 Mainline Plan and Profiles)

f. APP-033 2.9 Engineering Drawings and Sections (Volume D) (A122 LTC A2 Junction Plan and Profiles)

g. APP-034 2.9 Engineering Drawings and Sections (Volume E) (South Portal and Tilbury Plan and Profiles)

h. APP-035 2.9 Engineering Drawings and Sections (Volume F) (A13 Junction Plan and Profiles)

i. APP-036 2.9 Engineering Drawings and Sections (Volume G) (A122 LTC M25 Junction Plan and Profiles)

j. APP-037 2.9 Engineering Drawings and Sections (Volume H) (Overhead Diversion Routes and Pylon General Arrangement)

k. APP-140 6.1 Environmental Statement - Chapter 2 - Project Description

l. APP-145 6.1 Environmental Statement - Chapter 7 - Landscape and Visual

m. APP-159 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Sections 1 & 1A (1 of 10)

n. APP-160 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 2 (2 of 10)

o. APP-161 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 3 (3 of 10)

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p. APP-162 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 4 (4 of 10)

q. APP-163 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 9 (5 of 10)

r. APP-164 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 10 (6 of 10)

s. APP-165 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 11 (7 of 10)

t. APP-166 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 12 (8 of 10)

u. APP-167 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 13 (9 of 10)

v. APP-168 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 14 (10 of 10)

w. APP-197 6.2 Environmental Statement - Figure 7.1 - National Landscape Character Including Seascape

x. APP-198 6.2 Environmental Statement - Figure 7.2 - Local Landscape Character Areas

y. APP-199 6.2 Environmental Statement - Figure 7.3 - Environmental Lighting Zones

z. APP-200 6.2 Environmental Statement - Figure 7.4 - Landscape Designations

aa. APP-201 6.2 Environmental Statement - Figure 7.5 - Tranquillity Campaign to Protect Rural England

bb. APP-202 6.2 Environmental Statement - Figure 7.6 - Landscape Tranquillity Baseline Noise Survey Locations

cc. APP-203 6.2 Environmental Statement - Figure 7.7 - Greenbelt and Settlement Boundaries

dd. APP-204 6.2 Environmental Statement - Figure 7.8 - ZTV - 5km DTM Analysis of Main Construction Compounds (1 of 2)

ee. APP-205 6.2 Environmental Statement - Figure 7.8 - ZTV - 5km DTM Analysis of Main Construction Compounds (2 of 2)

ff. APP-206 6.2 Environmental Statement - Figure 7.9 - ZTV (5km) - Lower Thames Crossing Electricity Overhead Line (OHL) Diversions Analysis

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gg. APP-207 6.2 Environmental Statement - Figure 7.10 - ZTV (5km) - Lower Thames Crossing route Analysis Overview

hh. APP-208 6.2 Environmental Statement - Figure 7.11 - ZTV (5km) - Lower Thames Crossing route Highway Section Analysis (1 of 6)

ii. APP-209 6.2 Environmental Statement - Figure 7.11 - ZTV (5km) - Lower Thames Crossing route Highway Section Analysis (2 of 6)

jj. APP-210 6.2 Environmental Statement - Figure 7.11 - ZTV (5km) - Lower Thames Crossing route Highway Section Analysis (3 of 6)

kk. APP-211 6.2 Environmental Statement - Figure 7.11 - ZTV (5km) - Lower Thames Crossing route Highway Section Analysis (4 of 6)

ll. APP-212 6.2 Environmental Statement - Figure 7.11 - ZTV (5km) - Lower Thames Crossing route Highway Section Analysis (5 of 6)

mm. APP-213 6.2 Environmental Statement - Figure 7.11 - ZTV (5km) - Lower Thames Crossing route Highway Section Analysis (6 of 6)

nn. APP-214 6.2 Environmental Statement - Figure 7.12 - ZTV (2.5km) - Lower Thames Crossing route Analysis Overview (1 of 2)

oo. APP-215 6.2 Environmental Statement - Figure 7.12 - ZTV (2.5km) - Lower Thames Crossing route Analysis Overview (2 of 2)

pp. APP-216 6.2 Environmental Statement - Figure 7.13 - ZTV (2.5km) - Lower Thames Crossing route Highway Section Analysis (1 of 4)

qq. APP-217 6.2 Environmental Statement - Figure 7.13 - ZTV (2.5km) - Lower Thames Crossing route Highway Section Analysis (2 of 4)

rr. APP-218 6.2 Environmental Statement - Figure 7.13 - ZTV (2.5km) - Lower Thames Crossing route Highway Section Analysis (3 of 4)

ss. APP-219 6.2 Environmental Statement - Figure 7.13 - ZTV (2.5km) - Lower Thames Crossing route Highway Section Analysis (4 of 4)

tt. APP-220 6.2 Environmental Statement - Figure 7.14 - ZTV (2.5km) – Lower Thames Crossing route Analysis with Earthwork Mitigation Overview (1 of 2)

uu. APP-221 6.2 Environmental Statement - Figure 7.14 - ZTV (2.5km) – Lower Thames Crossing route Analysis with Earthwork Mitigation Overview (2 of 2)

vv. APP-222 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (1 of 12)

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ww. APP-223 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (2 of 12)

xx. APP-224 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (3 of 12)

yy. APP-225 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (4 of 12)

zz. APP-226 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (5 of 12)

aaa. APP-227 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (6 of 12)

bbb. APP-228 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (7 of 12)

ccc. APP-229 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (8 of 12)

ddd. APP-230 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (9 of 12)

eee. APP-231 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (10 of 12)

fff. APP-232 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (11 of 12)

ggg. APP-233 6.2 Environmental Statement - Figure 7.15 - ZTV (2.5km) - Lower Thames Crossing route Highway Section with Earthwork Mitigation (12 of 12)

hhh. APP-234 6.2 Environmental Statement - Figure 7.16 - Visual Effects Drawing with Representative Viewpoint and Photomontage Locations

iii. APP-235 6.2 Environmental Statement - Figure 7.17 - Representative Viewpoints - Winter and Summer Views (1 of 8)

jjj. APP-236 6.2 Environmental Statement - Figure 7.17 - Representative Viewpoints - Winter and Summer Views (2 of 8)

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kkk. APP-237 6.2 Environmental Statement - Figure 7.17 - Representative Viewpoints - Winter and Summer Views (3 of 8)

lll. APP-238 6.2 Environmental Statement - Figure 7.17 - Representative Viewpoints - Winter and Summer Views (4 of 8)

mmm. APP-239 6.2 Environmental Statement - Figure 7.17 - Representative Viewpoints - Winter and Summer Views (5 of 8)

nnn. APP-240 6.2 Environmental Statement - Figure 7.17 - Representative Viewpoints - Winter and Summer Views (6 of 8)

ooo. APP-241 6.2 Environmental Statement - Figure 7.17 - Representative Viewpoints - Winter and Summer Views (7 of 8)

ppp. APP-242 6.2 Environmental Statement - Figure 7.17 - Representative Viewpoints - Winter and Summer Views (8 of 8)

qqq. APP-243 6.2 Environmental Statement - Figure 7.18 - Representative Viewpoints - Night-time (inc. Winter) Views

rrr. APP-244 6.2 Environmental Statement - Figure 7.19 - Photomontages - Winter Year 1 and Summer Year 15 (1 of 4)

sss. APP-245 6.2 Environmental Statement - Figure 7.19 - Photomontages - Winter Year 1 and Summer Year 15 (2 of 4)

ttt. APP-246 6.2 Environmental Statement - Figure 7.19 - Photomontages - Winter Year 1 and Summer Year 15 (3 of 4)

uuu. APP-247 6.2 Environmental Statement - Figure 7.19 - Photomontages - Winter Year 1 and Summer Year 15 (4 of 4)

vvv. APP-248 6.2 Environmental Statement - Figure 7.20.1 - Traffic effects on Kent Downs AONB during construction (1 of 6)

www. APP-249 6.2 Environmental Statement - Figure 7.20.1 - Traffic effects on Kent Downs AONB during construction (2 of 6)

xxx. APP-250 6.2 Environmental Statement - Figure 7.20.1 - Traffic effects on Kent Downs AONB during construction (3 of 6)

yyy. APP-251 6.2 Environmental Statement - Figure 7.20.1 - Traffic effects on Kent Downs AONB during construction (4 of 6)

zzz. APP-252 6.2 Environmental Statement - Figure 7.20.1 - Traffic effects on Kent Downs AONB during construction (5 of 6)

aaaa. APP-253 6.2 Environmental Statement - Figure 7.20.1 - Traffic effects on Kent Downs AONB during construction (6 of 6)

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bbbb. APP-254 6.2 Environmental Statement - Figure 7.20.2 - Traffic effects on Kent Downs AONB during operational year 2030 and 2045

cccc. APP-255 6.2 Environmental Statement - Figure 7.21.1 - Noise Effects on Kent Downs AONB During Construction

dddd. APP-256 6.2 Environmental Statement - Figure 7.21.2 - Noise Effects on Kent Downs AONB During Operational Year 2030 and 2045

eeee. APP-257 6.2 Environmental Statement - Figure 7.21.3 - Existing Tranquillity within Kent Downs AONB

ffff. APP-258 6.2 Environmental Statement - Figure 7.22 - Tree Survey Dual Scope Layout

gggg. APP-259 6.2 Environmental Statement - Figure 7.23 - Existing Tree Constraints Plan (1 of 2)

hhhh. APP-260 6.2 Environmental Statement - Figure 7.23 - Existing Tree Constraints Plan (2 of 2)

iiii. APP-261 6.2 Environmental Statement - Figure 7.24 - Tree Removal and Retention Plan

jjjj. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

kkkk. APP-337 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan - Annex A - Outline Site Waste Management Plan

llll. APP-376 6.3 Environmental Statement - Appendix 7.1 - Local Planning Policy of Relevance to Landscape and Visual

mmmm. APP-377 6.3 Environmental Statement - Appendix 7.2 - Landscape and Visual Assessment Methodology

nnnn. APP-378 6.3 Environmental Statement - Appendix 7.3 - Area of Search and Zone of Theoretical Visibility Analysis

oooo. APP-379 6.3 Environmental Statement - Appendix 7.4 - National Character Baseline including Seascape Character

pppp. APP-380 6.3 Environmental Statement - Appendix 7.5 - Local Landscape Character Baseline

qqqq. APP-381 6.3 Environmental Statement - Appendix 7.6 - Kent Downs Area of Outstanding Natural Beauty Relevant Guidance

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rrrr. APP-382 6.3 Environmental Statement - Appendix 7.7 - Representative Viewpoint and Visual Receptor Baseline Descriptions and Visual Sensitivity

ssss. AS-054 6.3 Environmental Statement - Appendix 7.8 - Technical Methodologies

tttt. APP-384 6.3 Environmental Statement - Appendix 7.9 - Schedule of Landscape Effects

uuuu. APP-385 6.3 Environmental Statement - Appendix 7.10 - Schedule of Visual Effects

vvvv. APP-386 6.3 Environmental Statement - Appendix 7.11 - Traffic and Noise Effects on the Kent Downs Area of Outstanding Natural Beauty

wwww. APP-387 6.3 Environmental Statement - Appendix 7.12 - Arboricultural Impact Assessment

xxxx. APP-388 6.3 Environmental Statement - Appendix 7.13 - Views from the Road Assessment

yyyy. APP-389 6.3 Environmental Statement - Appendix 7.14 - Landscape and Visual Legislation and Policy

zzzz. APP-486 6.4 Environmental Statement - Non-Technical Summary (NTS)

aaaaa. APP-169 ES Figure 2.5: Construction Information

bbbbb. AS-030 2.6 Work Plans Volume C Utilities (21 to 49) (Clean) (Version 2)

ccccc. APP-490 6.7 Outline Landscape and Ecology Management Plan

ddddd. APP-495 7.2 Planning Statement

eeeee. APP-498 7.2 Planning Statement - Appendix C - Local Authority Policy

fffff. APP-501 7.2 Planning Statement – Appendix F – Kent Downs Area of Outstanding Natural Beauty

ggggg. APP-509 7.4 Project Design Report - Part D - General Design South of the River

hhhhh. APP-511 7.4 Project Design Report - Part D - General Design North of the River - Tilbury to the A13 Junction

iiiii. APP-516 7.5 Design Principles

jjjjj. APP-539 7.10 Health and Equalities Impact Assessment

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Table 3.19 Summary of issues raised in RRs concerning Landscape and Visual, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern that the Project would negatively affect the appearance of the countryside, including references to the loss of green spaces, the countryside and Green Belt, with some respondents noting the impacts on the Kent Downs Area of Outstanding Natural Beauty.	As described in ES Chapter 7: Landscape and Visual [**Application Document APP-145**], the Applicant has carried out an assessment of landscape and visual impacts of the Project during construction and operation, following the methodology set out in the Design Manual for Roads and Bridges (DMRB), while also having regard to the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment (IEMA), 2013). Landscape considerations include landscape features and elements, landscape character and areas of particular value such as designated landscapes. Visual considerations include visual amenity and views experienced by people from publicly accessible viewpoints and nearby buildings, including residential properties. ES Appendix 7.14: Landscape and Visual Legislation and Policy [**Application Document APP-389**] sets out how the Applicant has considered and addressed relevant legislation and had regard to relevant National Policy Statements (NPSs) and other relevant national, county and local plans and policies which relate to the assessment of landscape and visual effects. Policies in the NPSs which relate to decision-making in relation to matters of relevance to this topic of the ES are addressed in the Planning Statement [**Application Document APP-495**]. ES Chapter 7: Landscape and Visual [**Application Document APP-145**] summarises the significant landscape and visual impacts of the Project during construction and operation. During construction, there would be temporary adverse effects on the landscape character of the Kent Downs AONB and on the landscape character in the Green Belt, along with temporary adverse visual effects on users of recreational facilities, residents and people travelling through the study area. During operation, there would be permanent adverse effects on the landscape character of the Kent Downs AONB and on the Green Belt and permanent adverse effects on users of recreational facilities, residents and people travelling through the study area. These effects would reduce by the design year (15 years after opening year) as planting mitigation matures. Section 7.5 of ES Chapter 7: Landscape and Visual [**Application Document APP-145**] sets out the proposed mitigation to reduce the landscape and visual impacts to what the Applicant considers acceptable levels, given the requirements and benefits of the Project. It is demonstrated in Chapter 8 of the Planning Statement [**Application Document APP-495**] that the need for the Project and the benefits it would deliver outweigh the landscape and other impacts and so accord with the requirements of relevant NPSs and other policy.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comment expressing concern about the removal of a wooded area of the central reservation on the A2/M2, saying this is a negative proposal and is not sufficiently highlighted within the Application.	Paragraphs 7.9.6 and 7.9.14 of ES Chapter 7: Landscape and Visual [**Application Document APP-145**] describe the impact of the removal of vegetation along the A2/M2 on views and the landscape, which would have some temporary impacts during construction and permanent impacts once the Project is operational. More information about vegetation removal can be found in ES Appendix 7.9: Schedule of Landscape Effects [**Application Document APP-384**] and ES Appendix 7.10: Schedule of Visual Effects [**Application Document APP-385**]. Planning Statement Appendix F: Kent Downs Area of Outstanding Natural Beauty [**Application Document APP-501**] addresses the impacts of the Project on the Kent Downs AONB, with paragraph F.3.3 noting that removal of vegetation within the central reserve would reduce the amount of land acquired outside of the existing highway boundary, thereby reducing the overall footprint of the highway corridor within the AONB and reducing vegetation removal within Shorne Woods on the north side of the A2/M2. Overall, it is concluded at paragraph F.7.7 of Appendix F [**Application Document APP-501**] that exceptional circumstances exist which are necessary in policy terms to justify the development of the Project in a small part of the AONB, and that these compelling and exceptional reasons outweigh the impacts which may be caused.
Comments expressing concern about the proposed new landscaped areas at Chalk Park and Tilbury Fields. These include the suitability of the site, responsibility for maintenance, whether the local community supports this proposal, and whether it could facilitate housing on what is currently Green Belt.	Chalk Park provides embedded mitigation for the Project and involves the reuse of excavated material from construction to provide landscape and visual mitigation, habitat connectivity and to integrate the Project into the surrounding landscape. North-eastern Gravesend and Chalk were identified in the Gravesham Borough Council Open Space Assessment Report[1] as areas with limited open space provision. Chalk Park has therefore been proposed to provide new open space in this area to help address the lack of open space provision in this location, as well as generating a positive legacy of green infrastructure and creating separation between the South Portal and edge of Gravesend. The proposals for new publicly accessible open spaces at Chalk Park and Tilbury Fields were formulated after extensive public consultation, as well as engagement with the relevant local authorities, including design workshops that were attended by Gravesend Borough Council (for Chalk Park) and Thurrock Council (for Tilbury Fields). Information about how the Applicant consulted on its proposals is presented in the Consultation Report [**Application Documents APP-064** to **APP-090**], including information as to how the Applicant had regard to the feedback received. Information about discussions with local authorities, including those ongoing, are presented in the relevant Statements

[1] Knight Kavanagh & Page for Gravesham Borough Council (2016). Gravesham Borough Council Open Space Assessment Report. Accessed May 2023. https://www.gravesham.gov.uk/downloads/file/257/open-space-assessment.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	of Common Ground [**Application Documents APP-093** to **APP-136**]. The proposals to reuse excavated material at Chalk Park and Tilbury Fields are presented in the General Arrangement Plans (Volume B) [**Application Document APP-016**], the Project Design Report [**Application Documents APP-509 and APP-511**], and the outline Site Waste Management Plan [**Application Document APP-337**]. Provision for the maintenance of Chalk Park (and other areas of open space and mitigation) is described in paragraph 4.1.1 of the outline Landscape and Ecology Management Plan (oLEMP) [**Application Document APP-490**]. Paragraph 4.1.7 of the oLEMP states that third parties may manage all or part of this land, but they have not yet been identified, with the Applicant retaining final responsibility for the land's maintenance. In general, within Gravesham, any decisions with regards to future housing development on Green Belt would be the responsibility of the relevant local planning authority. However, there are no plans to build housing on the proposed Chalk Park land. On the contrary, there are long-term plans for maintenance and management of the land as a publicly accessible recreational area.
A comment expressing concern that views from a Scout Activity Centre north of the River Thames towards the estuary would be impeded by the proposed new landscaping at Tilbury Fields.	Condovers Scout Activity Centre adjoining Church Road, West Tilbury is generally enclosed by vegetation and buildings within the grounds and the adjoining landscape. However, from parts of the activity centre there are distant views south towards the River Thames estuary valley and rising ground beyond. The River Thames lies approximately 2km to the south of the activity centre. During construction, taller construction elements could interrupt views from Condovers Scout Activity Centre towards the River Thames estuary valley in the short term. On completion of construction, the Project would not be seen as a prominent feature in the wider landscape and is unlikely to have much effect on the visibility of the river area. However, there could be some minor interruption of views south-east due to the sculptural landscape mounding at the new Tilbury Fields publicly accessible recreational area. However, this would be in an area already affected by landform changes associated with restoration works at Ash Fields. The Project's impacts on views are summarised in Section 7.9 of ES Chapter 7 [**Application Document APP-145**] and ES Appendix 7.10: Schedule of Visual Effects [**Application Document APP-385**]. During construction, there could be views of taller construction elements within the northern tunnel entrance compound and Station Road compound, both of which lie to the south of the Tilbury Loop railway line as shown in ES Figure 2.5: Construction Information [**Application Document APP-169**]. There are also likely to be filtered views of adjacent utility works and modifications to overhead lines as shown in the Work Plans Volume C Utilities [**Additional Submission AS-030**].

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	On completion of construction in the opening year, the proposed Lower Thames Crossing, associated traffic north of the River Thames and sculptural landscape mounding in Tilbury Fields could be just discernible in mid-range views south-east from the activity centre, filtered by existing vegetation. The removal of a section of existing overhead line to the south-west of the Tilbury Loop railway line would result in a slight reduction in the number of pylons and overhead lines visible in the direction of the River Thames estuary valley. By the design year, established mitigation planting shown in ES Figure 2.4: Environmental Masterplan Section 9 (5 of 10) [**Application Document APP-163**], would soften the appearance of any parts of the Project corridor visible from the activity centre.
Comments expressing concern about how different property types have been assessed for the landscape and visual appraisal in the Environmental Statement, including the Whitecroft Care Home, and its status as a multiple occupancy residence.	As described in ES Chapter 7: Landscape and Visual [**Application Document APP-145**], the Applicant has carried out an assessment of landscape and visual impacts of the Project during construction and operation, following the methodology set out in the Design Manual for Roads and Bridges (DMRB), while also having regard to the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment (IEMA), 2013). This includes an assessment of views from the Whitecroft Care Home and its surroundings. Section 7.6 of ES Chapter 7 [**Application Document APP-145**] presents the residual effects associated with the Project. During construction, there would be large adverse effects on views from the Whitecroft Care Home, reducing to moderate adverse effects in design year (15 years after opening year) once mitigation planting is established. ES Appendix 7.7: Representative Viewpoint and Visual Receptor Baseline Descriptions and Visual Sensitivity [**Application Document APP-382**] provides the approximate number of residential receptors at each visual receptor location. The number of residential receptors relates to the number of residential 'properties'. For example, at nearby visual receptor location VR-S11-R-018, there are seven residential properties. For the purposes of assessment, Whitecroft Care Home is considered to be one residential property. ES Appendix 7.7 does not identify the number of residents at each property address. It is acknowledged that there are several residents at the Whitecroft Care Home. The visual impact assessment in ES Appendix 7.10: Schedule of Visual Effects [**Application Document APP-385**] provides a realistic worst-case assessment for residents. Therefore, the actual significance of visual effect for some residents, for example those living in rooms/apartments with an aspect screened by retained vegetation or facing away from the Project, is likely to be less than that reported in ES Appendix 7.10. The Applicant continues to engage with the care home's representatives in order to further consider these impacts and possible mitigation measures.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about potential light pollution as a result of the Project, with some respondents referring to impacts on the night sky and the landscape.	Temporary lighting during construction would be designed, positioned and directed to prevent or minimise light disturbance, as set out in Section 6.8 of ES Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan [**Application Document APP-336**]. The use of operational lighting as part of the Project would be minimised where safe to do so, and operational lighting would be '*controllable, directional and as low-level as is practicable and safe*', as stated in clauses LST.02 and LST.03 of the Design Principles [**Application Document APP-516**]. Light pollution, as a topic with the potential to affect people's health and well-being, was scoped in to the Health and Equalities Impact Assessment (HEqIA) [**Application Document APP-539**] for both construction and operational phases of the Project. The assessment is provided in Section 7.14 of the HEqIA and includes an evidence base (setting out relevant findings from a literature review), links with local health and equality strategies (for example the role of the wider environment in improving health outcomes), as well as identifying baseline information as set out in ES Appendix 7.5: Local Landscape Character Baseline [**Application Document APP-380**] and ES Appendix 7.7: Representative Viewpoint and Visual Receptor Baseline Descriptions and Visual Sensitivity [**Application Document APP-382**]. Mitigation measures associated with reducing light effects are also set out in Section 7.14 of the HEqIA. The assessment concludes that the health outcome for both general and sensitive populations/communities as a result of changes in light pollution during both construction and operation phases is considered to be neutral (Tables 7.50 and 7.51 of the HEqIA [**Application Document APP-539**] respectively). Changes to the night-time environment in terms of the perception of landscape character and night-time views that are likely to result from proposed new and replacement lighting forming part of the DCO application have been assessed within ES Appendix 7.9: Schedule of Landscape Effects [**Application Document APP-384**] and ES Appendix 7.10: Schedule of Visual Effects [**Application Document APP-385**].

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3.21 Terrestrial Biodiversity

Introduction

3.21.1 A total of 358 IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Terrestrial Biodiversity.

3.21.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-146 6.1 Environmental Statement - Chapter 8 - Terrestrial Biodiversity

b. APP-159 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Sections 1 & 1A (1 of 10)

c. APP-160 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 2 (2 of 10)

d. APP-161 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 3 (3 of 10)

e. APP-162 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 4 (4 of 10)

f. APP-163 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 9 (5 of 10)

g. APP-164 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 10 (6 of 10)

h. APP-165 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 11 (7 of 10)

i. APP-166 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 12 (8 of 10)

j. APP-167 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 13 (9 of 10)

k. APP-168 6.2 Environmental Statement - Figure 2.4 - Environmental Masterplan Section 14 (10 of 10)

l. APP-262 6.2 Environmental Statement - Figure 8.1 - Designated Sites

m. APP-263 6.2 Environmental Statement - Figure 8.2 - Phase 1 Habitat Map

n. APP-264 6.2 Environmental Statement - Figure 8.3 - Hedgerow Regulations Assessment

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o. APP-265 6.2 Environmental Statement - Figure 8.4 - NVC and Lower Plant Survey Locations

p. APP-266 6.2 Environmental Statement - Figure 8.5 - Invasive Plant Species Locations

q. APP-267 6.2 Environmental Statement - Figure 8.6 - Phase 1 Field and Desk Based Assessment Coverage

r. APP-268 6.2 Environmental Statement - Figure 8.7 - Invertebrate Survey Locations

s. APP-269 6.2 Environmental Statement - Figure 8.8 - GCN Presence Absence Results

t. APP-270 6.2 Environmental Statement - Figure 8.9 - Reptile Survey Results

u. APP-271 6.2 Environmental Statement - Figure 8.10 - Ornithology Survey Areas

v. APP-272 6.2 Environmental Statement - Figure 8.11 - Ornithology Intertidal Vantage Point Results

w. APP-273 6.2 Environmental Statement - Figure 8.12 - Ornithology Intertidal Vantage Point Results - Assemblages

x. APP-274 6.2 Environmental Statement - Figure 8.13 - Functionally Linked Land Transects - Wintering

y. APP-275 6.2 Environmental Statement - Figure 8.14 - Functionally Linked Land Transect Results - Wintering (Nocturnal)

z. APP-276 6.2 Environmental Statement - Figure 8.15 - Functionally Linked Land Transects - Breeding

aa. APP-277 6.2 Environmental Statement - Figure 8.16 - Designated Woodland Transect Results - Wintering

bb. APP-278 6.2 Environmental Statement - Figure 8.17 - Designated Woodland Transect Results - Breeding

cc. APP-279 6.2 Environmental Statement - Figure 8.18 - Ornithology Main Route Transects Results - Wintering

dd. APP-280 6.2 Environmental Statement - Figure 8.19 - Ornithology Main Route Transects Results - Breeding

ee. APP-281 6.2 Environmental Statement - Figure 8.20 - Ornithology Barn Owl Distribution and Breeding Sites (CONFIDENTIAL)

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ff. APP-282 6.2 Environmental Statement - Figure 8.21 - Ornithology Marsh Harrier Distribution (CONFIDENTIAL)

gg. APP-283 6.2 Environmental Statement - Figure 8.22 - Ornithology Other Schedule 1 Species Distribution

hh. APP-284 6.2 Environmental Statement - Figure 8.23 - Woodland Assessment Locations and Bat Tree Survey Results

ii. APP-285 6.2 Environmental Statement - Figure 8.24 - Bat Building Survey Results

jj. APP-286 6.2 Environmental Statement - Figure 8.25 - Bat Transect and Crossing Point Locations

kk. APP-287 6.2 Environmental Statement - Figure 8.26 - Dormouse Survey Locations and Results

ll. APP-288 6.2 Environmental Statement - Figure 8.27 - Otter and Water Vole Survey Results

mm. APP-289 6.2 Environmental Statement - Figure 8.28 - Tilbury 2 Water Vole Survey Results

nn. APP-290 6.2 Environmental Statement - Figure 8.29 - Badger Survey Results (CONFIDENTIAL)

oo. APP-291 6.2 Environmental Statement - Figure 8.30 - Badger Bait Marking Survey Results (CONFIDENTIAL)

pp. APP-292 6.2 Environmental Statement - Figure 8.31 - Other Mammals Survey Results

qq. APP-293 6.2 Environmental Statement - Figure 8.32 - Compensation Area Phase 1 Survey

rr. APP-294 6.2 Environmental Statement - Figure 8.33 - Ancient Woodland Impacts

ss. APP-295 6.2 Environmental Statement - Figure 8.34 - Badger Results (CONFIDENTIAL)

tt. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

uu. APP-390 6.3 Environmental Statement - Appendix 8.1 - Designated Sites

vv. APP-391 6.3 Environmental Statement - Appendix 8.2 - Plants and Habitats

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ww. APP-392 6.3 Environment Statement - Appendix 8.3 - Terrestrial Invertebrates

xx. APP-393 6.3 Environmental Statement - Appendix 8.4 - Freshwater Ecology

yy. APP-394 6.3 Environmental Statement - Appendix 8.5 - Amphibians

zz. APP-395 6.3 Environment Statement - Appendix 8.6 - Reptiles

aaa. APP-396 6.3 Environmental Statement - Appendix 8.7 - Ornithology

bbb. APP-397 6.3 Environmental Statement - Appendix 8.8 - Bats

ccc. APP-398 6.3 Environmental Statement - Appendix 8.9 - Dormouse

ddd. APP-399 6.3 Environmental Statement - Appendix 8.10 - Water Vole

eee. APP-400 6.3 Environmental Statement - Appendix 8.11 - Otter

fff. APP-401 6.3 Environmental Statement - Appendix 8.12 - Badger (CONFIDENTIAL)

ggg. APP-402 6.3 Environmental Statement - Appendix 8.13 - Other Mammals

hhh. APP-403 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (1 of 4)

iii. APP-404 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (2 of 4)

jjj. APP-405 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (3 of 4)

kkk. APP-406 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (4 of 4)

lll. APP-407 6.3 Environmental Statement - Appendix 8.15 - Construction and Operational Light Spill Calculations

mmm. APP-408 6.3 Environmental Statement - Appendix 8.16 - Draft EPS Mitigation Licence Application - Bats

nnn. APP-409 6.3 Environmental Statement - Appendix 8.17 - Draft EPS Mitigation Licence Application - Great Crested Newts (1 of 5)

ooo. APP-410 6.3 Environmental Statement - Appendix 8.17 - Draft EPS Mitigation Licence Application - Great Crested Newts (2 of 5)

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ppp. APP-411 6.3 Environmental Statement - Appendix 8.17 - Draft EPS Mitigation Licence Application - Great Crested Newts (3 of 5)

qqq. APP-412 6.3 Environmental Statement - Appendix 8.17 - Draft EPS Mitigation Licence Application - Great Crested Newts (4 of 5)

rrr. APP-413 6.3 Environmental Statement - Appendix 8.17 - Draft EPS Mitigation Licence Application - Great Crested Newts (5 of 5)

sss. APP-414 6.3 Environmental Statement - Appendix 8.18 - Draft EPS Mitigation Licence Application - Dormouse

ttt. APP-415 6.3 Environmental Statement - Appendix 8.19 - Draft Badger Development Licence Application (CONFIDENTIAL)

uuu. APP-416 6.3 Environmental Statement - Appendix 8.20 - Draft Water Vole Conservation Licence Application

vvv. APP-417 6.3 Environmental Statement - Appendix 8.21 - Biodiversity Metric Calculations

www. APP-418 6.3 Environment Statement - Appendix 8.22 - Terrestrial Ecology Surveys at Nitrogen Deposition Compensation Sites

xxx. APP-419 6.3 Environmental Statement - Appendix 8.23 - Terrestrial Biodiversity Legislation and Policy

yyy. APP-487 6.5 Habitats Regulations Assessment - Screening Report and Statement to Inform an Appropriate Assessment

zzz. APP-490 6.7 Outline Landscape and Ecology Management Plan

aaaa. APP-087 5.1 Consultation Report - Appendix S - Community impacts consultation material

bbbb. APP-494 7.1 Need for the Project

cccc. APP-495 7.2 Planning Statement

dddd. APP-516 7.5 Design Principles

eeee. AS-038 3.1 Draft Development Consent Order

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Table 3.20 Summary of issues raised in RRs concerning Terrestrial Biodiversity, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about the Project's impacts on ancient woodland, addressing factors such as the amount of ancient woodland that may be directly affected or fragmented, and the way in which impacts have been assessed.	The effects of the Project on Terrestrial Biodiversity have been assessed within Environmental Statement (ES) Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] including assessments of designated areas, such as Sites of Special Scientific Interest (SSSIs), and ancient woodlands and veteran trees. It is explained in Section 8.3 of ES Chapter 8 that the assessment has regard to both direct and indirect impacts, including severance or fragmentation of habitats or wildlife corridors. ES Chapter 8 describes the magnitude of the impacts, and the measures proposed to avoid, reduce, and compensate for the effects on sensitive ecological receptors, including ancient woodland and veteran trees. The Applicant recognises the irreplaceable nature of ancient woodland and veteran trees. Impacts upon ancient woodland and veteran trees have (amongst other environmental impacts) been considered throughout the route options selection process, and the Project's impacts on these areas have been reduced through its design, while still achieving the Scheme Objectives, as set out in the Need for the Project [**Application Document APP-494**]. This design is reported within the Planning Statement [**Application Document APP-495**], specifically Chapter 5: Project evolution and alternatives, and Chapter 8: Planning balance and conclusions. The Project would result in the direct the loss of 5.35ha of ancient woodland south of the River Thames, and 1.57ha north of the River Thames; a total of 6.92ha. Where these impacts on ancient woodland cannot be avoided, compensatory woodland planting is proposed to offset the impacts. While ancient woodland cannot be replaced, new woodland planting would be designed to strengthen connectivity between existing retained woodland areas, particularly around Shorne and Ashenbank Woods SSSI, Claylane Wood, Great Crabbles Wood SSSI and Jeskyns Community Woodland to the south of the A2/M2. North of the River Thames, ancient woodland compensation planting is primarily proposed around Folkes Lane and Hole Farm with some immediately adjacent to Rainbow Wood Shaw. This would build resilience into the wider network of designated sites and habitats and support a large number of species. ES Figure 8.33 [**Application Document APP-294**] shows the locations of ancient woodland impacts and compensation planting areas. The national need and benefits which would be delivered by the Project clearly outweigh the loss of ancient woodland and veteran trees, as per the policy test at NPSNN paragraph 5.32. Specific ancient woodland compensatory planting proposed by the Project totals 48.75ha south of the River Thames and 32.00ha north of the River Thames: a total of 80.75ha. Further details of

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	this habitat creation are provided in ES Figure 2.4: Environmental Masterplan [**Application Documents APP-159 to APP-168**], the Design Principles [**Application Document APP-516**], and the outline Landscape and Ecology Management Plan [**Application Document APP-490**].
Comments expressing concern about the Project's impacts on woodland during construction and operation, and with the removal of sections of Thames Chase Community Forest to accommodate the new road.	Overall, there would be several hundred hectares of new woodland and habitats created across the Project during the construction phase, providing biodiversity benefits. The proposed A122 Lower Thames Crossing/M25 junction would affect the Thames Chase Forest Centre and the Applicant has engaged with Forestry England to inform plans to mitigate this impact. Proposals include the provision of replacement land to compensate for the loss within the Thames Chase Forest Centre. As part of the Community Impacts Consultation in July 2021, the Applicant consulted on a proposed reduction of the amount of replacement open space land, removing a previously proposed area of land on the eastern side of the M25 with all proposed replacement land now on the western side of the M25, north and south of the existing Thames Chase Forest Centre. Consultation Report Appendix S: Community Impacts Consultation Material [**Application Document APP-087**] contains more information about these proposals.
Comments expressing concern that the Applicant's assessments of the Project impacts on terrestrial biodiversity during construction and operation are unsatisfactory and have underestimated the impacts on sensitive habitats and species.	The assessment methodology for determining the impacts of the Project on terrestrial biodiversity is set out in ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**]. The following standards and guidance documents have been used in devising the methodology for data collection and assessment of terrestrial biodiversity impacts: • Design Manual for Roads and Bridges (DMRB). • Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal (CIEEM, 2018) (hereafter referred to as the 'CIEEM guidelines') The value of ecological features such as sites, habitats, and species, are determined with reference to characteristics such as legal status, conservation priority, habitat diversity and connectivity, population size, rarity, life cycle stage and distribution. Receptor values are framed within a geographical scale. Likely significant effects have been characterised and described using the approach set out in the CIEEM guidelines and DMRB standards. Where significant adverse effects are considered likely, the assessment has identified measures to avoid or reduce the significant adverse effect. These measures have been designed iteratively during an integrated design process working with Project engineers to arrive at a Project design which incorporates embedded, good practice, and essential mitigation. If after implementation of these measures, a significant residual effect remains likely, then compensation measures have been investigated where appropriate.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	Separately, and in response to paragraph 5.23 of the NPSNN, biodiversity metric calculations have been made to assess the biodiversity unit value of the baseline conditions, and that forecast to be generated by the Project. This is calculated using the Natural England Biodiversity Metric 3.1 Calculation Tool. A separate Habitats Regulations Assessment has also been undertaken to assess the impacts on European Sites [**Application Document APP-487**]. This is in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended by the EU Exit Regulations 2019).
Comment asking what measures would be taken to monitor the impacts on terrestrial biodiversity before and after the Project is implemented.	Monitoring of protected species during and post-construction would be in line with the requirements of the protected species mitigation licences (see ES Appendices 8.16, 8.17, 8.18, 8.19 and 8.20 [**Application Documents APP-408 to APP-416**] for the draft protected species licence applications for bats, great crested newts, dormice, badgers (confidential), and water voles, as well as REAC Ref. TB015 in ES Appendix 2.2: CoCP [**Application Document APP-336**]. A suitably qualified and experienced Environmental Clerk of Works (ECoW) would be employed throughout the construction works to ensure all measures and method statements, including monitoring of important ecological features and biodiversity resources, are adhered to (see REAC Ref. TB006 in ES Appendix 2.2: CoCP [**Application Document APP-336**]). Habitats suitable for use by protected species, including nesting birds, would be subject to inspections by the ECoW prior to their removal, to confirm an absence of protected species (REAC Ref. TB004). Where protected species are found to be present, suitable mitigation and monitoring would be implemented to accord with any legislative requirements, which may include the implementation of works under a protected species mitigation licence (REAC Ref. TB014, TB015, TB016, TB017). Monitoring would also take place on the use of green bridges by the protected species these green bridges have been designed for, using techniques such as static bat detectors and camera traps. Following construction, monitoring of newly created habitats would be undertaken in accordance with the Landscape and Environmental Management Plan (LEMP). The LEMP would outline the long-term commitments to aftercare, monitoring and maintenance activities relating to the landscaping and ecological features. UKHab surveys and condition assessments would be undertaken to inform progress towards target habitat and condition (Panks *et al*., 2022a and 2022b).
Comments expressing concern about the impact of the Project on designated sites, such as Sites of Special Scientific Interest (SSSIs), Special	ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] includes an assessment of designated areas, including Shorne and Ashenbank Woods SSSI and local wildlife sites including Low Street Pit, Blackshots Nature Reserve, Mucking Heath, Rainbow Wood Shaw and Canal and Grazing Marsh Higham Local Wildlife Sites.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Protection Areas (SPAs), Ramsar, and other areas protected by regional, national or international biodiversity regulations.	The Planning Statement (Section 6.5) provides an assessment of the scheme against relevant policy relating to SSSIs and demonstrates that the need and benefits of the project outweigh moderate adverse harm identified in the ES. The Planning Statement also provides an assessment of effects on Local Wildlife Sites and notes that the Project has sought to minimise impacts where possible and provide compensation for losses to seek to retain the function of these sites as far as practicable. A Habitats Regulations Assessment (HRA) [**Application Document APP-487**] has also been carried out to identify any likely significant effects of the Project on European designated sites, including the protected areas in and around the Thames Estuary. Habitat functionality enhancement measures to reduce the effects of land take and disturbance on the Thames Estuary and Marshes SPA and Ramsar site are described in paragraphs 7.1.21 to 7.1.37 of the HRA [**Application Document APP-487**]. This report also demonstrates the suitability of proposed mitigation for effects on European sites (Section 7).
Comments expressing concern about the Project's impacts on habitats, which included designated sites such as fens and marshes, as well as unprotected areas of verge, woodland, ponds and water courses. A comment expressed concern about the loss of brownfield sites near the River Thames, which are a breeding area for invertebrate species.	The impacts on biodiversity are documented in ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] which provides an assessment of the impacts on sensitive flora and fauna as a result of the construction and operation of the Project. It includes assessments of habitat loss and potential species mortality, as well as how changes to factors such as noise and vibration, lighting, air quality and hydrological conditions could affect the species and habitats present within the Project's Zone of Influence (ZoI). Regarding concerns on habitat loss and fragmentation, the Project would result in the loss of predominantly arable land, together with some semi-natural habitat, but would offset these losses through the creation of more semi-natural habitats that would, in the long-term, offer high quality habitat on a landscape scale. The Project would also create seven green bridges across the road to mitigate fragmentation impacts. Details of habitat loss and creation south and north of the River Thames are given in Table 8.31 and Table 8.35 respectively within ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**].
Comments expressing concern that the Project is likely to encourage future development in its vicinity, either new roads or commercial and residential development, which would have a greater negative impact on local terrestrial biodiversity.	At all phases of design development, the Applicant has sought to minimise the land impacted or required for the Project, while ensuring there is sufficient land to build and operate it. The draft Development Consent Order [**Additional Submission AS-038**] ensures specific use of the land within the Order Limits for the Project. Any future development outside the land required to construct, operate, and maintain the Project would be decided by the relevant local planning authority or other relevant approval body. For more information about local authority aspirations for future development, refer to their relevant local plans.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about the proposed measures in the Application that seek to offset or mitigate impacts on terrestrial biodiversity, including suggestions that protections for a Ramsar site are insufficiently secured, or that mitigation sites are too far from Thurrock to be beneficial to local people.	The Project includes a range of environmental commitments and mitigation measures in the form of: • Embedded mitigation • Good practice mitigation • Essential mitigation Embedded mitigation is included within the Design Principles [**Application Document APP-516**] or as features presented on ES Figure 2.4: Environmental Masterplan [**Application Documents APP-159 to APP-168**]. Good practice and essential mitigation are included in the Register of Environmental Actions and Commitments (REAC). The REAC forms part of ES Appendix 2.2: Code of Construction Practice (CoCP) [**Application Document APP-336**]. Relevant good practice and essential mitigation to reduce terrestrial biodiversity effects are identified below. Biodiversity connectivity would be maintained by crossings of the Project by seven mixed-use green bridges. Green bridges have been individually designed to provide the greatest benefit at each particular crossing location, with reference given to the Landscape Institute Technical Note for Green Bridges (Landscape Institute, 2015). Various sites have been identified by the Project as being required for essential ecological mitigation to address a number of adverse effects on terrestrial biodiversity, as identified in ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**]. Mitigation measures include the creation of significant areas of habitat (woodland planting; creation of open mosaic habitat; wetland habitats), and locations to create new or strengthen existing links between habitats, benefiting biodiversity by building resilience into the wider habitat networks across the landscape. A Habitats Regulations Assessment (HRA) [**Application Documents APP-487 and APP-488**] has also been carried out to identify any likely significant effects of the Project on European designated sites, including the Thames Estuary and Marshes Special Protection Area and Ramsar site. The HRA contains proposed mitigation measures to reduce potential adverse effects. The HRA concludes that there would be no adverse effects on the integrity of the Thames Estuary and Marshes Special Protection Area and Ramsar site or any other European designated site.
Comments expressing concern about the Project's impacts on wildlife, with particular concerns noted about impacts on bats, water voles, reptiles, birds, as well as insect and invertebrate populations.	The effects of the Project on terrestrial biodiversity have been assessed within the ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**], including protected species and important invertebrate assemblages, both terrestrial invertebrates and freshwater macroinvertebrates. The Applicant has designed the Project to reduce impacts on wildlife during operation and construction. The design has been developed following the mitigation hierarchy of 'avoid, reduce, restore and compensate'.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	The construction of highways can affect the area's ecology, with impacts occurring in several ways. Potential impact pathways arising from the Project were identified and characterised to assess the potential impacts to ecological features, with measures to mitigate potential impacts being employed. The level of potential impact was then considered against the importance of each ecological feature to determine the significance of any residual effects. A biodiversity mitigation strategy has been developed that aims to maintain and strengthen habitat connectivity, reduce disturbance to species and create new habitat areas for a range of species.
Comment noting that a particular stakeholder has an agreement with the Applicant as to how an area of land required for construction would be reinstated to improve its biodiversity value.	At a number of locations, habitats in land temporarily required for construction would be reinstated following construction to improve their biodiversity. The construction phase of the Project would result in habitat losses and gains of both a temporary and permanent nature. Tables 8.31 and 8.35 of ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] show the predicted habitat losses and gains associated with the Project south and north of the River Thames respectively.

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3.22 Marine Biodiversity

Introduction

3.22.1 Two IPs with whom the Applicant does not have an SoCG raised issues in their RRs on the topic of Marine Biodiversity.

3.22.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-146 6.1 Environmental Statement - Chapter 8 - Terrestrial Biodiversity

b. APP-147 6.1 Environmental Statement - Chapter 9 – Marine Biodiversity

c. APP-296 6.2 Environmental Statement - Figure 9.1 - Nationally and internationally designated sites within 11km of Order Limits

d. APP-297 6.2 Environmental Statement - Figure 9.2 - Comparison of Common Seal Locations in the Vicinity of the Thames Estuary Over Three Surveys (2013-14)

e. APP-298 6.2 Environmental Statement - Figure 9.3 - Comparison of Grey Seal Locations in the Vicinity of the Thames Estuary Over Three Surveys (2013-14)

f. APP-420 6.3. Environmental Statement - Appendix 9.1 - Assessment of Ground-borne Noise and Vibration, and Underwater Noise from the Tunnel Boring Machine at Marine Receptors

g. APP-421 6.3 Environmental Statement - Appendix 9.2 - Marine Biodiversity Legislation and Policy

h. APP-478 6.3 Environmental Statement - Appendix 14.7 - Water Framework Directive

i. APP-487 6.5 Habitats Regulations Assessment - Screening Report and Statement to Inform an Appropriate Assessment

j. APP-064 to APP-090 5.1 Consultation Report

k. APP-494 7.1 Need for the Project

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Table 3.21 Summary of issues raised in RRs concerning Marine Biodiversity, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about the Project's impacts on marine biodiversity, including fish and invertebrates, while also expressing concern about onshore water environments such as ponds, rivers and aquifers.	ES Chapter 9: Marine Biodiversity [**Application Document APP-147**] and the Habitats Regulations Assessment (HRA) [**Application Document APP-487**] assess the potential effects of the Project on marine biodiversity. This assessment includes the impacts during construction and operation of the Project and impacts of the Project in combination with other relevant developments in its vicinity. Where impacts are identified, these would be avoided or mitigated. There would be no likely significant negative effects on the marine environment as a result of the Project. ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] provides information about how the Applicant has assessed potential effects on biodiversity on land and within the freshwater environment, and how these have been avoided or mitigated. A Water Framework Directive (WFD) compliance assessment (ES Appendix 14.7) [**Application Document APP-478**] has been carried out to assess all aspects of the Project that have the potential to impact WFD quality elements of surface and groundwater bodies within the Project's Zone of Influence. This assesses the Project's impact on water scarcity, drinking and bathing water, emissions and water reuse, as well as river basin and flood risk management.
A comment requesting future consultation over the Project with regards to its impacts on marine biodiversity.	Various rounds of public consultation have taken place during the evolution of the design of the Project as outlined in the Consultation Report [**Application Documents APP-064 to APP-069**]. Consultees comprised prescribed bodies, local authorities, people with an interest in land affected by the Project and local communities. A summary of stakeholder engagement specific to marine biodiversity during the EIA process is provided in Table 9.1 of ES Chapter 9: Marine Biodiversity [**Application Document APP-147**], including meetings with the Marine Management Organisation, the Environment Agency, Natural England and the Port of London Authority. The Applicant will continue to engage and consult regularly with stakeholders as appropriate on issues of marine biodiversity.

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3.23 Geology and Soils

Introduction

3.23.1 Four of the IPs with whom the Applicant does not have an SoCG raised the topic of Geology and Soils in their RRs.

3.23.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-148 6.1 Environmental Statement - Chapter 10 - Geology and Soils

b. APP-299 6.2 Environmental Statement - Figure 10.1 - Geology Site Walkover

c. APP-300 6.2 Environmental Statement - Figure 10.2 - Soil Scape Mapping

d. APP-301 6.2 Environmental Statement - Figure 10.3 - Provisional Agricultural Land Classification Mapping

e. APP-302 6.2 Environmental Statement - Figure 10.4 - Agricultural Land Classification Mapping

f. APP-303 6.2 Environmental Statement - Figure 10.5 - Refined Conceptual Site Model - Credible Contamination Sources

g. APP-304 6.2 Environmental Statement - Figure 10.6 - Superficial Deposits

h. APP-305 6.2 Environmental Statement - Figure 10.7 - Bedrock Geology

i. APP-306 6.2 Environmental Statement - Figure 10.8 - Local Geological Sites

j. APP-307 6.2 Environmental Statement - Figure 10.9 - Unexploded Ordnance Map

k. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

l. APP-422 6.3 Environmental Statement - Appendix 10.1 - Geology and Soils Legislation and Policy

m. APP-423 6.3 Environmental Statement - Appendix 10.2 - Stability Report

n. APP-424 6.3 Environmental Statement - Appendix 10.3 - Site Walkover Factual Report

o. APP-425 6.3 Environmental Statement - Appendix 10.4 - Agricultural Land Classification Factual Report

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p. APP-426 6.3 Environmental Statement - Appendix 10.5 - Ground Model

q. APP-427 6.3 Environmental Statement - Appendix 10.6 – Preliminary Risk Assessment Report

r. APP-428 6.3 Environmental Statement - Appendix 10.7 – East Tilbury Landfill Risk Assessment

s. APP-429 6.3 Environmental Statement - Appendix 10.8 - Generic Quantitative Risk Assessment Report for the Phase 1 Investigation

t. APP-430 6.3 Environmental Statement - Appendix 10.9 - Generic Quantitative Risk Assessment Report for the Phase 2 Investigation (1 of 3)

u. APP-431 6.3 Environmental Statement - Appendix 10.9 - Generic Quantitative Risk Assessment Report for the Phase 2 Investigation (2 of 3)

v. APP-432 6.3 Environmental Statement - Appendix 10.9 - Generic Quantitative Risk Assessment Report for the Phase 2 Investigation (3 of 3)

w. APP-433 6.3 Environmental Statement - Appendix 10.10 - Unexploded Ordnance (UXO) Desk Study and Risk Assessment

x. APP-434 6.3 Environmental Statement - Appendix 10.11 - Remediation Options Appraisal and Outline Remediation Strategy

y. APP-486 6.4 Environmental Statement - Non-Technical Summary (NTS)

Table 3.22 Summary of issues raised in RRs concerning Geology and Soils, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern that the Project would result in soil contamination as a result of disturbance of existing sites, such as landfill or a former petrol station, or as a result of the introduction of contaminants by the Applicant or its Contractors.	The Applicant has carried out an assessment of the impacts of the Project during construction and operation on Geology and Soils in the affected area. Environmental Statement (ES) Chapter 10: Geology and Soils [**Application Document APP-148**] presents the assessment of the likely significant effects on geology and soil, including the potential impacts of contaminated land on human health and controlled water receptors. The assessment methodology for land contamination is presented in paragraphs 10.3.65 to 10.3.67 and Tables 10.2 and 10.3 of ES Chapter 10 [**Application Document APP-148**] and has been carried out in line with current best practice as presented in the Land Contamination Risk Management (LCRM) guidance (Environment Agency, 2021) and the methodology standard provided in the Design Manual for Roads and Bridges (DMRB). A Preliminary Risk Assessment Report (ES Appendix 10.6) [**Application Document APP-427**] and Generic Quantitative Risk Assessments (ES Appendices 10.8 and 10.9) [**Application**

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	Documents APP-429 to APP-432] have been completed and which set out the potential risks from contamination within the study area. The identified risks to human health and controlled waters from pre-existing contamination can be avoided or mitigated by the measures secured through Project commitments set out in ES Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan (CoCP) [**Application Document APP-336**], which includes the Register of Environmental Actions and Commitments (REAC) and the remediation methodologies described in ES Appendix 10.11: Remediation Options Appraisal and Outline Remediation Strategy [**Application Document APP-434**]. During construction, there is a risk of accidental spillages of oils, cement and fuels, occurring through the movement of construction traffic and the storage of materials. Good practice measures, including the requirement for a pre-condition survey; the management of chemical, waste oils or fuel storage and refuelling activities within construction compounds; and controls on refuelling activities where these take place on worksites outside of construction compounds. Measures to minimise any such impacts during the construction period (such as fuels) are set out in ES Appendix 2.2: CoCP [**Application Document APP-336**], which includes the REAC. With the implementation of proposed mitigation measures, no likely significant effects on or from contamination are predicted during the construction or operation of the Project.

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3.24 Material Assets and Waste

Introduction

3.24.1 One of the IPs with whom the Applicant does not have an SoCG raised the topic of Material Assets and Waste in their RR.

3.24.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-149 6.1 Environmental Statement - Chapter 11 - Material Assets and Waste

b. APP-308 6.2 Environmental Statement - Figure 11.1 - Active Landfill and Waste Transfer and Treatment

c. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

d. APP-337 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan - Annex A - Outline Site Waste Management Plan

e. APP-338 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First iteration of Environmental Management Plan - Annex B - Outline Materials Handling Plan

f. APP-435 6.3 Environmental Statement - Appendix 11.1 - Excavated Materials Assessment

g. APP-436 6.3 Environmental Assessment - Appendix 11.2 - Mineral Safeguarding Assessment

h. APP-437 6.3 Environmental Statement - Appendix 11.3 List of Third party Offsite Waste Infrastructure Receptors

i. APP-438 6.3 Environmental Statement - Appendix 11.4 - Material Assets Assessment Supporting Data

j. APP-439 6.3 Environmental Statement - Appendix 11.5 - Waste Assessment Supporting Data

k. APP-440 6.3 Environmental Statement - Appendix 11.6 - Material Assets and Waste Legislation and Policy

l. APP-516 7.5 Design Principles

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Table 3.23 Summary of issues raised in RRs concerning Materials Assets and Waste, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
A request for more information about the reuse of excavated materials for the Applicant's proposed landforms.	The Project would implement the waste hierarchy: prioritising the elimination of sources of waste, reusing site-derived wastes on site (including material excavated from cuttings and the tunnel approaches and portals), and minimising the volume sent off-site for recycling, recovery or disposal. This would reduce the number of vehicle movements required to service the construction phase. In line with feedback received during public consultation, an informal public space, Chalk Park, would be created around the South Portal. This would use excavated material from the tunnel portal and its approach, which would form the substrate for a mixture of chalk grassland, woodland and other suitable habitats to improve local biodiversity and ecological connectivity. A new landform, with woodland planting to the top, would create vantage points to the wider Thames Estuary. At the North Portal new landforms would be created using excavated material from the construction works. The Design Principles [**Application Document APP-516**] provides more information about the proposals to reuse excavated material at Chalk Park and Tilbury Fields as well as Project-wide landscaping proposals. An Excavated Materials Assessment (ES Appendix 11.1 [**Application Document APP-435**]) has been carried out to identify appropriate sites to receive and manage surplus excavated materials from tunnelling. The assessment has identified the availability of capacity in the local waste management infrastructure and evaluated potential sites against sustainability criteria, including distance from the Project and their accessibility to different transport modes. The assessment of material assets and waste is documented in ES Chapter 11: Material Assets and Waste [**Application Document APP-149**]. The appointed Contractor would produce a Site Waste Management Plan, which would be incorporated in the Environmental Management Plan in line with the First Iteration Environmental Management Plan presented in ES Appendix 2.2 [**Application Document APP-336**]. The proposed reuse of excavated materials on both the north and south sides of the river has notably decreased the volume of material that would otherwise have to be transported off site by road. The excavated material reuse plan played a substantial role in achieving a 46% reduction in the average number of HGVs per month compared to the initial proposals presented at Statutory Consultation. An outline Site Waste Management Plan (ES Appendix 2.2, Annex A) [**Application Document APP-337**] and outline Materials Handling Plan (ES Appendix 2.2, Annex B) [**Application Document APP-338**] are included as part of the DCO application. Materials excavated from the tunnels would be in the form of slurry pumped from the tunnel boring machine to the Slurry Treatment Plant equipment. The slurry would be treated to a suitable form to be used to construct Tilbury Fields located on top of Goshems Farm, near to the North Portal.

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3.25 Noise and Vibration

Introduction

3.25.1 A total of 62 of the IPs with whom the Applicant does not have an SoCG raised the topic of Noise and Vibration in their RRs.

3.25.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-146 6.1 Environmental Statement - Chapter 8 - Terrestrial Biodiversity

b. APP-150 6.1 Environmental Statement - Chapter 12 - Noise and Vibration

c. APP-151 6.1 Environmental Statement - Chapter 13 - Population and Human Health

d. APP-309 6.2 Environmental Statement - Figure 12.1 - Construction Noise and Vibration Study Area

e. APP-310 6.2 Environmental Statement - Figure 12.2 - Construction Traffic Noise - Affected Links

f. APP-311 6.2 Environmental Statement - Figure 12.3 - Operational Road Traffic Noise Study Area

g. APP-312 6.2 Environmental Statement - Figure 12.4 - Operational Ventilation Noise Sensitive Receptors

h. APP-313 6.2 Environmental Statement - Figure 12.5 - Baseline Noise Monitoring Locations

i. APP-314 6.2 Environmental Statement - Figure 12.6 - Operational Road Traffic Noise Mitigation

j. APP-315 6.2 Environmental Statement - Figure 12.7 - Opening Year Noise Change Contour (DSOY minus DMOY)

k. APP-316 6.2 Environmental Statement - Figure 12.8 - Future Year Noise Change Contour (DSFY minus DMOY)

l. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

m. APP-441 6.3 Environmental Statement - Appendix 12.1 - Noise and Vibration Legislation and Policy

n. APP-442 6.3 Environmental Statement - Appendix 12.2 - Operational Ventilation Noise Assessment: South Portal

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o. APP-443 6.3 Environmental Statement - Appendix 12.3 - Operational Ventilation Noise Assessment: North Portal

p. APP-444 6.3 Environmental Statement - Appendix 12.4 - Construction Noise and Vibration Assessment

q. APP-445 6.3 Environmental Statement - Appendix 12.5 - Baseline Noise Survey Information

r. APP-446 6.3 Environmental Statement - Appendix 12.6 - Assessment of Ground-borne Noise and Vibration at Land-Based Receptors

s. APP-447 6.3 Environmental Statement - Appendix 12.7 - Noise Insulation Regulations Assessment

t. APP-448 6.3 Environmental Statement - Appendix 12.8 - National Grid Electricity Transmission Network, Assessment for Audible Noise

u. APP-449 6.3 Environmental Statement - Appendix 12.9 - Effects of Vibration from Road Traffic (Highways England Ref. 1-457 Noise Support 2017-2021)

v. APP-450 6.3 Environmental Statement - Appendix 12.10 - Road Traffic Noise Mitigation and Cost Benefit Analysis

w. AS-038 3.1 Draft Development Consent Order

Table 3.24 Summary of issues raised in RRs concerning Noise and Vibration, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about increased noise and vibration during the Project's construction and operation. Some Interested Parties said noise and vibration would impact people's health and would affect property values.	The Applicant has carried out an assessment of the likely significant effects of the Project on noise and vibration during construction and operation, which is set out in ES Chapter 12: Noise and Vibration [**Application Document APP-150**]. The assessment considers potential changes to noise and vibration levels at identified noise sensitive receptors due to construction activities, as well as changes to road traffic noise levels and the tunnel ventilation system noise during operation. The assessment is compliant with the methodology set out in the Design Manual for Roads and Bridges (DMRB), which references relevant guidance including the Calculation of Road Traffic Noise (CRTN) (Department of Transport and Welsh Office, 1988), and other British Standards. Sections 12.5 and 12.6 of ES Chapter 12 [**Application Document APP-150**] present the Applicant's proposed mitigation during the Project's construction and operation, along with the predicted residual impacts and resultant significant effects on noise and vibration.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	There are expected to be temporary adverse significant effects from construction traffic at a total of 460 noise sensitive receptors, with the affected receptors varying over each of the construction years, along with temporary adverse effects at a total of 391 noise sensitive receptors adjacent to diversion routes, with the affected receptors varying over the duration of each diversion. During construction, the Applicant's assessments predict temporary adverse significant effects for up to 15 vibration sensitive receptors adjacent to structures identified to require percussive piling. This reduces to three vibration sensitive receptors with the implementation of vibratory piling methods. Once the Project is operational, permanent adverse effects are predicted at 1,440 noise sensitive receptors within the study area. Permanent beneficial effects are predicted at 1,372 noise sensitive receptors within the study area. The noise and vibration impacts for construction and operation are also summarised in the ES Non-Technical Summary [**Application Document APP-486**]. **Human health** In terms of noise and vibration impacts on human health, ES Chapter 13: Population and Human Health [**Application Document APP-151**] notes that there would be some significant negative health outcomes from the construction of the Project, and a range of positive and negative health outcomes from operation of the Project. The Applicant has made a series of commitments to mitigate significant negative impacts, and these are set out in Sections 13.5 and 13.6 of ES Chapter 13: Population and Human Health [**Application Document APP-151**] and the Code of Construction Practice (CoCP) (ES Appendix 2.2), including the Register of Environmental Actions and Commitments (REAC) [**Application Document APP-336**]. The commitments to mitigation would be legally binding under the provisions of Requirement 4 in Part 1 of Schedule 2 of the draft DCO [**Additional Submission AS-038**]. **Property values** Eligible owners and occupiers of land would be entitled to make a claim for compensation, where a relevant ground for compensation is made in accordance with the Compensation Code. Each claim for compensation would be considered on its own merits, in line with the Code. Further information about the compensation offered to those affected by the Project can be found in the Compulsory Purchase and Compensation booklet 2: Compensation to Business Owners and Occupiers and Compulsory Purchase and Compensation booklet 4: Compensation to Residential Owners and Occupiers. These include information about compensation for when the value of a property has been affected by the Project.
Comments expressing concern about the adequacy of the proposed	A range of measures have been included in the design of the Project to reduce its potential noise impacts on the surrounding area. These measures include landscaping and earthworks such

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
measures to mitigate noise impacts, including suggestions for mitigations including suggestions for additional measures as well as monitoring of impacts. Impacts on local people, including a nearby scout camp and a care home, were mentioned, as were impacts on specified areas such as Upminster, Cranham, Tilbury Viaduct and around the M25.	as cuttings and false cuttings, low-noise road surfacing, and noise barriers. Mitigation measures for reducing operational noise and vibration are presented on ES Figure 12.6: Operational Road Traffic Noise Mitigation [**Application Document APP-314**] and within Section 12.5 of ES Chapter 12: Noise and Vibration [**Application Document APP-150**], while the predicted residual impacts and resultant significant effects are set out in Section 12.6. ES Figures 12.7 and 12.8 [**Application Documents APP-315 and APP-316** respectively] show the area affected by operational road traffic noise within the vicinity of the Project, as well as the Applicant's predictions for how road traffic noise levels would change. Additional mitigation measures are set out in ES Appendix 2.2: Code of Construction Practice [**Application Document APP-336**], which describes the measures that the appointed Contractor would be required to implement to reduce construction noise. The impacts on local people and amenities, both during construction and operation of the Project, are presented in ES Chapter 13: Population and Human Health [**Application Document APP-151**] which also sets out the proposed mitigation measures. **Specified areas** ES Figure 12.7: Opening Year Noise Change Contour (DSOY minus DMOY) [**Application Document APP-315**] and ES Figure 12.8: Future Year Noise Change Contour (DSFY minus DMOY) [**Application Document APP-316**] indicate how the areas of Upminster and Cranham would be affected by changes in road traffic noise levels as a result of implementing the Project. These areas would see either no change in road traffic noise levels or minor decreases. Similarly, the area where the Project joins the M25 would see either no change or a reduction in road traffic noise levels, as a result of the installation of low-noise road surfacing on the new and upgraded sections of carriageway and screening effects of earthworks. The affected area around the proposed Tilbury Viaduct, which includes the Condovers Scout Activity Centre, would see an increase in operational road traffic noise levels, varying from a Major Adverse Change to a Minor Adverse Change, depending largely on proximity to the new road. The Code of Construction Practice includes entries aimed at addressing potential noise impacts during construction, with the implementation of these measures having mitigatory effects at both the Condovers Scout Activity Centre and the Whitecroft Care Home. In addition, the Habitats Regulations Assessment - Screening Report and Statement to Inform an Appropriate Assessment [**Application Document APP-487**] describes an assessment of noise that has been undertaken and specific noise mitigation measures that have been agreed with Natural England to avoid impacts to the qualifying features within the Thames Estuary and Marshes Ramsar site.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern that wildlife would be affected by Project noise.	The assessment of noise and vibration impacts from the Project includes consideration of how noise and vibration would disturb species in the vicinity of the Project. Section 8.6 of ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] sets out how the residual noise impacts would affect species, with Section 8.5 explaining the proposed mitigation.
Comments expressing concern over the installation of noise monitors without consultation.	Pre-construction baseline monitors have been installed on selected lamp posts along the proposed route of the Project. This has been carried out with the agreement of the relevant local authorities, and notification letters were sent to residents in the immediate vicinity of each installation.
Comments expressing concern over the adequacy of information about noise impacts during consultation.	The Applicant consulted on indicative noise and vibration impacts at various stages of the Project, including during Statutory Consultation in 2018 and during the Community Impacts Consultation in July 2021. Noise impacts as a result of localised design changes were presented during other consultations, such as during Local Refinement Consultation in May 2022. The Planning Inspectorate, in accepting the application for development consent in November 2022, stated that the Applicant has complied with Chapter 2 of Part 5 of the Planning Act 2008, including carrying out the necessary pre-application consultation with stakeholders, land interests and the public.

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3.26 Population and Human Health

Introduction

3.26.1 A total of 90 of the IPs with whom the Applicant does not have an SoCG raised the topic of Population and Human Health in their RRs.

3.26.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-143 6.1 Environmental Statement - Chapter 5 - Air Quality

b. APP-145 6.1 Environmental Statement - Chapter 7 - Landscape and Visual

c. APP-150 6.1 Environmental Statement - Chapter 12 - Noise and Vibration

d. APP-151 6.1 Environmental Statement – Chapter 13 – Population and Human Health

e. APP-317 6.2 Environmental Statement – Figure 13.1 – Population and Human Health Baseline – Private Property & Housing, Development Land & Businesses, Community Land & Asset

f. APP-318 6.2 Environmental Statement – Figure 13.2 – Population and Human Health Baseline – PRoW and WCH routes

g. APP-319 6.2 Environmental Statement – Figure 13.3 – Population and Human Health Assessment – Properties and Businesses at Risk of Demolition

h. APP-320 6.2 Environmental Statement – Figure 13.4 – Population and Human Health Assessment – Proposed WCH Links

i. APP-321 6.2 Environmental Statement – Figure 13.5 – Agricultural Landowners

j. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

k. APP-451 6.3 Environmental Statement – Appendix 13.1 – Population and Human Health Legislation and Policy

l. APP-452 6.3 Environmental Statement – Appendix 13.2 – Ward Sensitivities

m. APP-495 7.2 Planning Statement

n. APP-499 7.2 Planning Statement - Appendix D - Open Space

o. APP-500 7.2 Planning Statement - Appendix E - Green Belt

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p. APP-501 7.2 Planning Statement - Appendix F - Kent Downs Area of Outstanding Natural Beauty

q. APP-502 7.2 Planning Statement - Appendix G - Private Recreational Facilities

r. APP-505 7.3 Section 106 Agreements - Heads of Terms

s. APP-512 7.4 Project Design Report - Part E - Design for Walkers, Cyclists and Horse Riders

t. APP-539 7.10 Health and Equalities Impact Assessment

u. APP-553 7.20 Benefits and Outcomes Document

Table 3.25 Summary of issues raised in RRs concerning Population and Human Health, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern that the Project's construction and operation would have negative impacts on the local community, in particular children, young people and schools. Environmental impacts such as air and noise pollution were cited, as well as other impacts such as increased traffic. There were also concerns about impacts on a residential care home.	ES Chapter 13: Population and Human Health [**Application Document APP-151**], describes how local communities could be affected by the construction and operation of the Project and explains the ways in which these impacts would be reduced. As well as the assessments documented in ES Chapter 13, the Applicant has carried out a Health and Equalities Impact Assessment (HEqIA) [A**pplication Document APP-539**], which considers the Project's impacts during construction and operation on the health and wellbeing of local communities covering a number of topics including severance, accessibility, work and training, access to open spaces and mental health and wellbeing. The HEqIA also considers the impacts on those protected by equalities legislation, such as children, older people, disabled people, and those with pre-existing health conditions, accounting for the impacts during construction and operation phases. The ES also includes assessments of the Project's impacts on specific aspects of the environment, including ES Chapter 5: Air Quality [**Application Document APP-143**]; and ES Chapter 12: Noise and Vibration [**Application Document APP-150**]. Construction of the Project would comply with the Applicant's Code of Construction Practice (CoCP) presented in ES Appendix 2.2 [**Application Document APP-336**], which sets out the range of controls and mitigation measures that would be used to limit or avoid impacts on local communities, including local roads, during the Project's construction. The CoCP sets out general environmental management principles, as well as information about construction site management and traffic management. The Applicant has designed the Project to provide additional benefits to local people once it is operational, such as including new areas of landscaped recreational land at Chalk Park and Tilbury Fields, as well as an upgraded network of Public Rights of

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	Way. The creation of new landforms, including Chalk Park hilltop landform and the Tilbury Fields sculptural landforms also reduces the amount of excavated material that would need to be removed using Heavy Goods Vehicles during construction. The Project includes design features such as cuttings, false cuttings, tree-planting and low noise surfacing to limit the noise and visual impacts of the Project once it is operational. Once the Project is operational, there would be beneficial impacts on many cross river journeys, as well as on other routes. There would also be significant positive impacts on jobs and training opportunities; the provision of walking, cycling and horse-riding routes; as well as access to new areas of recreational land at Tilbury Fields and Chalk Park. There would be both positive and negative impacts on noise due to changes in traffic flows at different locations. As part of the efforts to generate benefits for local communities, the Applicant intends to provide opportunities for people living locally that might enable them to work on the construction or operation of the route and would also seek to help local businesses form part of the supply chain that would build and operate the route. The Applicant is working with stakeholders to develop these plans and put them into action. See Section 7.2 of Section 106 Heads of Terms [**Application Document APP-505**] for further information.
	The Applicant's Benefits and Outcomes Document [**Application Document APP-553**] provides a framework to communicate what is being delivered within the Project's Development Consent Order and some of the wider activities undertaken by National Highways (both already and planned for the future) in the local area of the Project to support local people and the environment. In terms of the Whitecroft Care Home, the Applicant has sought to address concerns raised by the owners of the care home, in particular concerns about noise and visual impacts, by moving the slip road further west, and increasing the amount of woodland planting between the home and the slip road. The Applicant has also included an earthwork bund to the west of the care home, which would be up to 9m above ground level. This would provide visual and noise screening once constructed. See paragraph 13.6.75(a) of ES Chapter 13: Population and Human Health [**Application Document APP-151**] for further information. Discussions with the owner would continue in order to identify appropriate mitigation measures. Any impact on the business would be compensated in accordance with the Compensation Code.

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about local people's physical and mental health. Respondents say that the impacts of building and operating the Project, especially changes in noise and air pollution levels, would negatively impact health and wellbeing. Comments express concern that the most vulnerable people, such as the elderly and those with pre-existing health conditions, are likely to be most affected.	A Health and Equalities Impact Assessment (HEqIA) [**Application Document APP-539**] has been prepared, which considers the health impacts on local people and communities, including those protected by equality legislation, such as children and older people, during the construction and operation of the Project. Detailed information about the air quality impacts of the Project in the assessed local areas is presented in ES Chapter 5: Air Quality [**Application Document APP-143**]. The assessment methodology sets out the locations where air quality modelling was carried out and why these sites were selected. The assessment predicts that there would be areas where air quality is likely to improve and areas where air quality is likely to worsen as a result of the Project. Overall, the Project is not expected to result in significant adverse impacts on air quality in relation to human health when considering national and European air quality target levels, and the Design Manual for Roads and Bridges. Given that there would be no significant adverse impacts on air quality in relation to human health from the Project during operation, no mitigation for air quality effects is required.
Comments expressing concern about the Project's impacts on green spaces such as parks, open countryside, common land and recreational facilities such as golf courses.	Chapter 6 of the Planning Statement [**Application Document APP-495**] includes an explanation of the importance that the National Policy Statement for National Networks (NPSNN) places on high quality open space, green infrastructure and countryside. The chapter also explains that the NPSNN stipulates that any potential impacts on open space, sports and recreational buildings and land should be avoided unless those buildings or land are deemed to be surplus to requirements, are to be replaced with equivalent or better provision, or the Secretary of State determines that the benefits of the project outweigh their loss. A full assessment of the impacts of the Project on existing areas of open space, recreational facilities and green infrastructure has been carried out and is presented in Appendix D: Open Space [**Application Document APP-499**], Appendix G: Private Recreational Facilities [**Application Document APP-502**], and Appendix H: Green Infrastructure Study [**Application Document APP-503**] to this Planning Statement. They identify the areas affected, the reason and justification for identified impacts and the measures proposed to mitigate and compensate for those impacts. Overall, it is considered that the measures identified in Appendices D, G and H demonstrate that the Project accords with the relevant provisions of the NPSNN and NPS EN-1 in so far as impacts on open space, recreational facilities and green infrastructure are concerned. ES Chapter 13 Population and Human Health [**Application Document APP-487**] assesses the impacts of the Project on community land (which includes parks, common land and recreational facilities such as golf courses). The Health and

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	Equalities Impact Assessment [**Application Document APP-539**] assesses the impacts of the Project on access to open space.
Comments expressing concern that the substantial workforce required to build the Project would have a negative impact on local health or other public services, which it is said are already unable to meet local demand.	Healthcare has been considered as a community asset, and both baseline data and the assessment has been provided in ES Chapter 13: Population and Human Health [**Application Document APP-151**]. A significant proportion of the construction workforce is likely to be home-based (and therefore would already be registered with a general practitioner (GP)). Evidence from previous large-scale construction projects suggests that members of the temporary workforce are likely to remain registered with their home GP practice. The Applicant's Code of Construction Practice (CoCP) (ES Appendix 2.2) [**Application Document APP-336**] sets out that construction compounds would include welfare facilities for members of construction staff. In addition, the Applicant's Main Works Contractor's Scope document specifies that the appointed Contractor would have to provide occupational health and wellbeing services onsite, including treatment rooms for minor injuries and illnesses, and mental health support services. The Project has secured a commitment in the REAC (PH002) **[Application Document APP-336**] whereby the Contractor will provide an appropriate range of medical and occupational healthcare services to meet the physical and mental health needs of the construction workforce. At this stage, it is noted that the range of services will be agreed with the Applicant, following engagement with Integrated Care Partnerships.
Comments expressing concern that the Project would have negative impacts on public health on the basis that it would not provide sufficient new active travel routes and would negatively impact existing walking, cycling and horse-riding (WCH) routes.	The Applicant is one of the biggest builders of pathways in the UK and the Project would add or improve more than 40 miles in total: three miles for every one mile of new road. These new or improved pathways are designed to encourage active travel and promote health and wellbeing across the region. The plans include seven new green bridges to provide safe and easy crossings for people and wildlife, including an 84m-wide bridge in Kent, one of the widest green bridges in Europe. New footbridges, two over the A127 and one over the M25, will create safe, easy crossing points and restore links severed by historic road building. A network of bridleways would give horse riders an uninterrupted route between woodlands such as Thames Chase Forest, Hole Farm community woodland and the Mardyke in Essex, and Ranscombe Farm Reserve, Ashenbank Wood and Shorne Woods Country Park in Kent. For more information about the proposed routes for walkers, cyclists and horse riders, see the Project Design Report Part E – Design for Walkers, Cyclists and Horse Riders [**Application Document APP-512**]. The Health and Equalities Impact Assessment [**Application Document APP-539**] addresses the health impacts associated with access to open space and active travel in Sections 7.4 and 7.5

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3.27 Road Drainage and the Water Environment

Introduction

3.27.1 A total of 13 of the IPs with whom the Applicant does not have an SoCG raised the topic of Road Drainage and the Water Environment in their RRs.

3.27.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-147 6.1 Environmental Statement - Chapter 9 – Marine Biodiversity

b. APP-152 6.1 Environmental Statement – Chapter 14 – Road Drainage and the Water Environment

c. APP-322 6.2 Environmental Statement – Figure 14.1 – Surface Water Receptors and Resources

d. APP-323 6.2 Environmental Statement – Figure 14.2 – Groundwater Receptors and Resources

e. APP-324 6.2 Environmental Statement – Figure 14.3 – Superficial Aquifer Designations

f. APP-325 6.2 Environmental Statement – Figure 14.4 – Bedrock Aquifer Designations

g. APP-326 6.2 Environmental Statement – Figure 14.5 – Water Framework Directive – Surface Water Bodies, Transitional Waterbodies and Current Status

h. APP-327 6.2 Environmental Statement – Figure 14.6 – Water Framework Directive – Groundwater Bodies and Current Status

i. APP-328 6.2 Environmental Statement – Figure 14.7 – Water Framework Directive – Protected Areas

j. APP-453 6.3 Environmental Statement – Appendix 14.1 – Assessment Criteria Tables

k. APP-454 6.3 Environmental Statement – Appendix 14.2 – Water Features Survey Factual Report (1 of 2)

l. APP-455 6.3 Environmental Statement – Appendix 14.2 – Water Features Survey Factual Report (2 of 2)

m. APP-456 6.3 Environmental Statement – Appendix 14.3 – Operational Surface Water Drainage Pollution Risk Assessment

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n. APP-457 6.3 Environmental Statement – Appendix 14.4 – Hydromorphology Assessment

o. APP-458 6.3 Environmental Statement – Appendix 14.5 – Hydrogeological Risk Assessment (Part 1 of 2)

p. APP-459 6.3 Environmental Statement – Appendix 14.5 – Hydrogeological Risk Assessment (Part 2 of 2)

q. APP-460 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 1

r. APP-461 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 2

s. APP-462 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 3

t. APP-463 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 4

u. APP-464 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 5

v. APP-465 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 6

w. APP-466 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 7

x. APP-467 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 8

y. APP-468 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 9

z. APP-469 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 9 – Annex A

aa. APP-470 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 9 – Annex B

bb. APP-471 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 9 – Annex C

cc. APP-472 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 9 – Annex D

dd. APP-473 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 9 – Annex E

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ee. APP-474 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 9 – Annex F

ff. APP-475 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 9 – Annex G

gg. APP-476 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 9 – Annex H

hh. APP-477 6.3 Environmental Statement – Appendix 14.6 – Flood Risk Assessment – Part 10

ii. APP-478 6.3 Environmental Statement – Appendix 14.7 – Water Framework Directive

jj. APP-479 6.3 Environmental Statement – Appendix 14.8 – Road Drainage and the Water Environment Legislation and Policy

kk. APP-487 6.5 Habitats Regulations Assessment - Screening Report and Statement to Inform an Appropriate Assessment

ll. APP-495 7.2 Planning Statement

mm. AS-038 3.1 Draft Development Consent Order

nn. AS-048 6.2 Environmental Statement – Figure 14.4 – Bedrock Aquifer Designation

Table 3.26 Summary of issues raised in RRs concerning Road Drainage and the Water Environment, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern that the Project's construction and operation would increase the risk of flooding, including concerns around homes, playing fields, commercial properties (including farms or fishing lakes), and Coalhouse Fort. There were also concerns around the use of culverts to divert the Tilbury Main.	A Flood Risk Assessment (FRA) for the Project is provided in ES Appendix 14.6 [**Application Documents APP-460 to APP-477**]. The FRA demonstrates how flood risk would be managed over the operational life of the Project, taking climate change into account. The FRA follows the methodology set out in the Design Manual for Roads and Bridges (DMRB), and relevant guidance including Environment Agency (EA) and Lead Local Flood Authority publications that give, for example, direction on applying climate change allowances and managing surface water runoff from development. This assessment has been undertaken in accordance with relevant legislation and having regard to national and local plans and policies. The design of the Project and its associated mitigation, including the use of culverts, has considered the potential for water quality, flows, and levels of groundwater and surface water to be affected by road drainage during construction and operation. With the implementation of proposed mitigation measures and allowance for projected

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	climate change effects, no likely significant effects on road drainage and the water environment, including waters used for agricultural irrigation or fishing purposes, are predicted during construction and operation of the Project. Areas such as homes and playing fields would be similarly unaffected. Areas of land to the north of the River Thames around the proposed North Portal site are currently at risk from flooding due to the low-lying geography of the area. Construction activities could increase the risk of river flooding through, for example, the creation of earthworks causing the loss of floodplain storage. As construction of the Project would remove some of the floodplain storage, the Project design would provide compensatory flood storage elsewhere to offset this. The size of these areas has been calculated to ensure the compensation would be adequate. Compensatory flood storage areas would be located in land adjacent to the Mardyke and the Mardyke West Tributary. Compensatory flood storage would also be provided in the upstream catchment of West Tilbury Main. The Applicant does not expect construction to have any impact on the River Thames flood defences and would monitor the integrity of the defences during construction. The deep cuttings required for the Project would have retaining walls and seepage control systems in place to limit the ingress of groundwater. Powers are sought within the draft DCO [**Application Document AS-038**] for the Applicant to undertake works affecting watercourses and Schedule 14, Part 3 of the draft DCO includes Protective Provisions for the protection of local drainage authorities.
Comments expressing concern that the Project's construction and operation would have negative environmental impacts on designated or protected areas, including fens and marshes, with changes in water levels having a negative impact on habitats and species.	ES Chapter 9: Marine Biodiversity [**Application Document APP-147**] and the Habitats Regulations Assessment (HRA) [**Application Document APP-487**] assess the potential effects of the Project on marine biodiversity and, where impacts are identified, how these would be avoided or mitigated. ES Chapter 16: Cumulative Effects Assessment [**Application Document APP-154**] and the HRA assess the impact of the Project in combination with other new developments that would take place during the construction phase and contains proposed mitigation measures to avoid and reduce likely significant effects. The HRA concludes that there would be no adverse effect from the construction and operation of the Project on the integrity of the Thames Estuary and Marshes Special Protection Area and Ramsar site or any other European designated site. ES Chapter 9 concludes that there would be no likely significant negative effects on the marine environment as a result of the Project. Chapter 14 of the ES, informed by the Hydrogeological Risk Assessment (Appendix 14.5) assesses the potential for changes to groundwater levels and surface water hydrology supporting wetland habitats. The assessment concludes, that with the embedded and good practice measures detailed in the REAC in place, there would be no likely significant effects.

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3.28 Climate

Introduction

3.28.1 A total of 360 of the IPs with whom the Applicant does not have an SoCG raised the topic of Climate in their RRs.

3.28.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-153 6.1 Environmental Statement - Chapter 15 – Climate

b. APP-480 6.3 Environmental Statement - Appendix 15.1 - Climate Legislation and Policy

c. APP-481 6.3 Environmental Statement - Appendix 15.2 - Climate Resilience Baseline

d. APP-482 6.3 Environmental Statement - Appendix 15.3 - Climate Resilience Impacts and Effects

e. APP-504 7.2 Planning Statement - Appendix I - Carbon Strategy and Policy Alignment

f. APP-552 7.19 Carbon and Energy Management Plan

Table 3.27 Summary of issues raised in RRs concerning Climate, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about the Project's impact on climate as a result of the emission of greenhouse gases (GHG) during construction and operation. Some noted changes in assessments of climate impacts carried out by governing bodies such as the Welsh Government. Others called for the Project to be 'carbon neutral' or to use carbon capture technology.	Paragraph 5.18 of the NPSNN requires promoters of NSIPs to demonstrate that their project would not have a material impact on the ability of Government to meet its carbon reduction targets. The Project is setting out an industry leading position in terms of driving out carbon in the preliminary design and setting a framework to continue to reduce its carbon impact through the commitments made in the Carbon and Energy Management Plan, which is one of three documents addressing carbon reduction in the DCO Application: ES Chapter 15: Climate [**Application Document APP-153**] Planning Statement Appendix I: Carbon Strategy and Policy Alignment [**Application Document APP-504**] Carbon and Energy Management Plan [**Application Document APP-552**]. Additionally, a review and the Project's response to legislation, policies and plans relevant to climate is presented in ES Appendix 15.1: Climate Legislation and Policy [**Application Document APP-480**].

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	ES Chapter 15 [**Application Document APP-153**] and Planning Statement Appendix I [**Application Document APP-504**] explain that carbon impacts associated with construction of the Project have been calculated as being no larger than 0.058% of the fourth carbon budget. It also explains that the Department for Transport's Decarbonising Transport: A Better, Greener Britain is expected to lead to significant reductions in road-user emissions over the lifetime of the Project. A second iteration of the Carbon and Energy Management Plan [**Application Document APP-552**] would be used to demonstrate the implementation of the carbon commitments secured through the DCO during the construction phase and would set out the ways in which appointed Contractors would demonstrate that carbon emissions are kept within the defined limits. The Project has a commitment to implement the PAS2080 'Carbon Management in Infrastructure' standard, and each Contractor's plan would be refreshed annually to demonstrate it remains consistent with emerging best practice and aligned with their emissions pathway. The Applicant is employing new technologies and practices to make the Project a 'pathfinder' for low-carbon construction, which means (paragraph 1.1.3 of the Carbon and Energy Management Plan): • Constructing the Project for the lowest practicable carbon emissions • Testing low-carbon innovation and approaches Leaving a legacy that enables future projects to decarbonise, in line with the Applicant's ambition for net zero construction emissions by 2040.
Comments expressing concern that the adoption of electric vehicles (EVs) in the UK will not happen sufficiently quickly for reductions in GHG to occur once the Project is operational and that EVs would not be used during the construction of the Project.	The Government is supporting the expansion of EV usage, as explained in its Transport Decarbonisation Plan (DfT, 2021), and the Applicant is supporting this development in various ways. For example, the Applicant has committed to publishing a blueprint for EV charging services on the SRN and delivering £950m of charging infrastructure, both by 2023, aiming at providing at least six 150-350kW charge points at each motorway service area. The availability of sufficient, reliable and convenient charging stations will promote the uptake of EVs and facilitate the reduction of carbon emissions by end users. The use of EVs for construction vehicles would be encouraged through the Carbon and Energy Management Plan [**Application Document APP-552**], which would require appointed Contractors to stay within ambitious thresholds for energy consumption and carbon emissions.
Comments expressing concern about changes to weather patterns as a result of GHG emissions and calling for detailed	ES Chapter 15: Climate [**Application Document APP-153**] explains how the Applicant has assessed the potential impacts of the Project on climate change and the Project's vulnerability to climate change. The standards and guidance documents that were used in devising the methodology for data collection and

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
assessments of the impacts.	assessment of climate impacts are set out in Section 15.3 of that chapter. ES Chapter 15 also describes how emissions associated with construction and operation of the Project have been assessed, provides emissions figures, and explains how these calculations fit within Government targets for emissions reductions. A cumulative effects assessment for climate having regard for the effects of other developments is detailed in Section 15.7 of ES Chapter 15 [**Application Document APP-153**]. ES Appendix 15.3: Climate Resilience Impacts and Effects [**Application Document APP-482**] provides a summary of the conclusions of the Applicant's assessments of the Project's vulnerability to climate change, including changing weather patterns. It sets out a series of 'climate events', for example increased extreme temperatures and their potential effects on the Project, then explains the different forms of mitigation that have been included in the Project plans as a response to those risks.

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3.29 Cumulative Effects

Introduction

3.29.1 A total of 135 of the IPs with whom the Applicant does not have an SoCG raised the topic of Cumulative Effects in their RRs.

3.29.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-154 6.1 Environmental Statement - Chapter 16 - Cumulative Effects Assessment

b. APP-329 6.2 Environmental Statement - Figure 16.1 - Cumulative Zones of Influence

c. APP-330 6.2 Environmental Statement - Figure 16.2 - Developments in the Cumulative Shortlist

d. APP-331 6.2 Environmental Statement - Figure 16.3 - Overview Map of Local Authorities and Wards

e. APP-336 6.3 Environmental Statement - Appendix 2.2 - Code of Construction Practice, First Iteration of Environmental Management Plan

f. APP-483 6.3 Environmental Statement - Appendix 16.1 - Long List of Developments

g. APP-484 6.3 Environmental Statement - Appendix 16.2 - Short List of Developments

h. APP-485 6.3 Environmental Statement - Appendix 16.3 - Cumulative Effects Assessment Legislation and Policy

i. APP-494 7.1 Need for the Project

j. APP-498 7.2 Planning Statement - Appendix C - Local Authority Policy Review

k. APP-550 7.17 Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes

l. AS-038 3.1 Draft Development Consent Order

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Table 3.28 Summary of issues raised in RRs concerning Cumulative Effects, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern about different combinations of environmental impacts of the Project for example, air quality and noise, or terrestrial biodiversity and marine biodiversity.	Minimising adverse impacts on the environment is one of the Scheme Objectives agreed between the Applicant and the Department for Transport, with the Scheme Objectives set out in Table 1.1 of the Need for the Project [**Application Document APP-494**]. The Project's proposals have been designed to provide an appropriate balance between the need to reduce environmental impacts during construction, including impacts on local people, while still allowing the Project to be built safely and efficiently. The Project has also been developed to minimise the amount of land needed for its construction while still fulfilling the Scheme Objectives. The proposals avoid unnecessary impacts on local communities, the water environment, noise and light-sensitive areas, assets of cultural value, and flora and fauna. Where adverse impacts are identified appropriate mitigation measures would be implemented to reduce the impacts on local communities and the environment. These mitigation measures have been decided upon after careful consideration of feedback from the public and key stakeholders. They are addressed in the topic-specific chapters of the ES and relevant appendices. Not least ES Appendix 2.2: Code of Construction Practice (CoCP) and the Register of Environmental Actions and Commitments (REAC), which forms part of the CoCP [**Application Document APP-336**]. Mitigation measures proposed would be legally secured through requirements in Part 1 of Schedule 2 of the draft DCO [**Additional Submission AS-038**].
Comments expressing concern about the environmental impacts of the Project in conjunction with the impacts of other projects being built or operated at the same time.	The Applicant has produced a Cumulative Effects Assessment presented at ES Chapter 16 [**Application Document APP-154**] which considers both inter- and intra-project effects. Assessments of the relevant local plans can be found in Planning Statement Appendix C [**Application Document APP-498**]. In all instances, the land impacted or required for the Project has been minimised, including the number of homes that would be demolished, while ensuring there is sufficient land to build and operate the road. The Applicant is aware of other major infrastructure and development projects taking place, or expected to take place, in proximity to the Project around the time it is planned to be constructed and during its operational phase. The Applicant has proactively engaged with the developers of those projects as well as relevant local authorities and stakeholders to seek to manage the potential for cumulative impacts. More information about the interface between major infrastructure projects is included within Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes [**Application Document APP-550**]. The measures set out in that document demonstrate how the Applicant has sought to ensure that the Project does not prejudice the delivery of other NSIPs or major development proposals and supports development and regeneration in the Lower Thames area in accordance with the objectives of the NPSNN (paragraphs 2.6 and 2.13) as well as the Scheme Objectives for the Project.

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3.30 Habitats Regulations Assessment

Summary

3.30.1 There were no IPs with whom the Applicant does not have an SoCG that raised the topic of the Habitats Regulations Assessment (HRA) in their RRs.

3.30.2 For information about feedback on the HRA from IPs with whom the Applicant has an SoCG, see Chapter 2 of this report.

3.31 Nitrogen Deposition

Introduction

3.31.1 Seven of the IPs with whom the Applicant does not have an SoCG raised the topic of Nitrogen Deposition in their RRs.

3.31.2 Appendix A of this document includes a table setting out which IPs made comments that were allocated by the Applicant to each SoCG category.

List of relevant Application Documents

a. APP-060 4.1 Statement of Reasons

b. APP-143 6.1 Environmental Statement - Chapter 5 - Air Quality

c. APP-146 6.1 Environmental Statement - Chapter 8 - Terrestrial Biodiversity

d. APP-350 6.3 Environmental Statement - Appendix 5.6 - Project Air Quality Action Plan

e. APP-490 6.7 Outline Landscape and Ecology Management Plan

f. APP-403 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (1 of 4)

g. APP-404 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (2 of 4)

h. APP-405 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (3 of 4)

i. APP-406 6.3 Environmental Statement - Appendix 8.14 - Designated Sites Air Quality Assessment (4 of 4)

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Table 3.29 Summary of issues raised in RRs concerning Nitrogen Deposition, and the Applicant's responses

Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
Comments expressing concern or raising queries about the land to be acquired to compensate for the impacts of nitrogen deposition. Some comments expressed concern about the amount of land across the Project, while others expressed concern about particular land parcels being acquired.	At all phases of design development, the Applicant has sought to minimise the land impacted or required for the Project, while ensuring there is sufficient land to build and operate it. Following advice from Natural England the Applicant updated its approach to assessing nitrogen deposition by including consideration of ammonia emitted from vehicle exhausts, as well as emissions of nitrogen oxides (NOx). This resulted in new proposals to address and compensate for these impacts. The DCO application provides 245ha of compensatory habitat, with details of the sites and how they were selected provided in ES Appendix 5.6: Project Air Quality Action Plan (PAQAP) [**Application Document APP-350**]. Nitrogen deposition compensation sites were selected using a site selection methodology developed in partnership with stakeholders including Natural England as explained in the PAQAP [**Application Document APP-350**]. The Applicant's Minor Refinement Consultation was launched in May 2023, and included proposals to reduce this compensatory provision to 205ha. Further information is provided in the documentation on the Applicant's Minor Refinement Consultation web pages. Matters related to the compulsory acquisition of land needed in order to construct, operate and maintain the Project are addressed in the Statement of Reasons [**Application Document APP-060**].
Comments expressing concern about the impact of the Project on nitrogen deposition once the new road opens. Concerns were expressed about habitats, landscapes and the species they support being impacted, and areas around the A2/M2 where it claimed that nitrogen deposition already exceed guidelines.	The results of the Applicant's air quality modelling are summarised in ES Chapter 5: Air Quality [**Application Document APP-143**]. The modelling has been undertaken in accordance with the advice in the Design Manual for Roads and Bridges (DMRB). ES Chapter 8: Terrestrial Biodiversity [**Application Document APP-146**] provides the assessment of the nitrogen deposition changes and the determination of significance on the ecological designated sites and habitats within the affected road network (ARN). Impacts of planting within nitrogen deposition compensation sites on landscape character and views are discussed in ES Appendix 7.9: Schedule of Landscape Effects [**Application Document APP-384**] and ES Appendix 7.10: Schedule of Visual Effects [**Application Document APP-385**]. The baseline (existing) nitrogen deposition is included within the assessment of the effects of nitrogen deposition on habitats within designated sites but the assessment of the effect of the Project is based on the additional contribution of nitrogen from the Project irrespective of whether the existing baseline conditions exceed guidelines. The conclusion of the assessment is that there is the possibility of degradation of habitat quality on a number of the ecological designated sites and habitats, as a result of increases in nitrogen

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Summary of issues raised by Interested Parties in their RRs	The Applicant's response(s) to the issues raised
	deposition sufficient to constitute a significant adverse effect. It should be noted that no significant effects have been identified for impacts on human health or compliance with air quality Limit Values. Mitigation has been proposed where feasible, but where there are no appropriate mitigation measures, the Applicant has proposed a compensation approach of habitat creation at a landscape scale. This comprises a number of larger compensation measures in carefully selected locations associated with identifiable habitat networks to provide an ecologically robust option to compensate for the residual effect of nitrogen deposition. 205ha of compensatory provision is proposed at four compensation areas to offset the potential impacts of nitrogen deposition on designated ecological sites and habitats. These sites are in the following areas: M2 corridor and Blue Bell Hill, Gravesham and Shorne Woods, Southfields (Thurrock), and Hole Farm (Brentwood). These areas would link into retained habitats, creating resilience in the wider network and facilitating species movement across the landscape, including dormice, amphibians, bats and invertebrates. More information about the impact of the Project on nitrogen deposition, and any subsequent mitigation or compensation for these impacts can be found in ES Appendix 5.6: Project Air Quality Action Plan [**Application Document APP-350**]. The creation and management of habitats as part of Project mitigation and compensation is set out in the outline Landscape and Ecology Management Plan (oLEMP) [**Application Document APP-490**]. The oLEMP sets out proposals for appropriate long-term adaptive management, which will be informed by long-term monitoring and will ensure that these areas would be managed to ensure retention of their proposed structure, composition, and function.
Comment on the subject of the potential for additional enforcement of the speed limit between M2 junctions 3 and 4 as a method of reducing nitrogen deposition.	A number of potential mitigation types for the impacts of nitrogen deposition have been considered on a site-by-site basis including speed limit reduction, speed enforcement management and physical barriers. The assessment presented in the ES Appendix 5.6: Project Air Quality Action Plan [**Application Document APP-350**] has confirmed that speed enforcement management measures are feasible mitigation for effects on sites adjacent to the M2 between junctions 3 and 4. This measure would be technically feasible and would not impact on traffic rerouting. The reduced emissions associated with this measure would avoid significant effects on seven sites. Research by National Highways confirms that that additional enforcement of national speed limits reduces emissions and therefore contributes to a reduction in nitrogen deposition.

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3.32 Protective Provisions

Summary

3.32.1 There were no IPs with whom the Applicant does not have an SoCG that raised the topic of Protective Provisions in their RRs.

3.32.2 For information about feedback on Protective Provisions from IPs with whom the Applicant has an SoCG, see Chapter 2 of this report.

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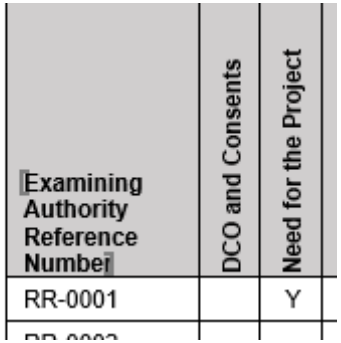
Appendix A Interested Parties and topics covered in their Relevant Representations

A.1.1 Appendix A comprises two tables.

A.1.2 In Table A.1, the reference numbers provided by the Planning Inspectorate for each Relevant Representation are listed along the ‘y’ axis and the names of the SoCG topic headings described in Chapter 1 of this report are listed along the ‘x’ axis. The Applicant has marked the relevant boxes in the table with the letter Y to indicate the topics that were identified in comments provided in each Relevant Representation.

A.1.3 For instance, the following example indicates that the Applicant identified comments on the subject of ‘Need for the Project’ but not ‘DCO and Consents’.

Plate A.1 Example reference from Table A.1



Examining Authority Reference Number	DCO and Consents	Need for the Project
RR-0001		Y

A.1.4 Table A.2 sets out the same references created by the Examining Authority alongside the names of each Interested Party, as they were provided when submitting their Relevant Representation.

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Table A.1 Matrix of Interested Parties and SoCG topic headings

Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0001		Y																												
RR-0002								Y				Y								Y										
RR-0003				Y																										
RR-0004		Y																												
RR-0005							Y	Y									Y							Y	Y					
RR-0006		Y																												
RR-0007																	Y													
RR-0008		Y																												
RR-0009																				Y							Y			
RR-0010		Y																												
RR-0011																				Y										
RR-0012		Y																												
RR-0013		Y		Y																							Y			
RR-0014							Y			Y		Y								Y										
RR-0015																				Y							Y			

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0016		Y																												
RR-0017		Y																												
RR-0018																	Y													
RR-0019																				Y							Y			
RR-0020																				Y							Y			
RR-0021																		Y												
RR-0022			Y					Y									Y			Y										
RR-0023		Y																		Y							Y			
RR-0024																									Y					
RR-0025																	Y			Y							Y			
RR-0026				Y											Y		Y		Y	Y										
RR-0027		Y																												
RR-0028																									Y					
RR-0029																												Y		
RR-0030			Y														Y		Y					Y						
RR-0031																				Y							Y			
RR-0032																				Y							Y			

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0033				Y																										
RR-0034																	Y													
RR-0035																				Y							Y			
RR-0036		Y																												
RR-0037		Y																												
RR-0038																				Y							Y			
RR-0039		Y									Y	Y								Y										
RR-0040																				Y										
RR-0041				Y																							Y			
RR-0042		Y																												
RR-0043				Y																										
RR-0044				Y																							Y			
RR-0045																				Y	Y									
RR-0046		Y		Y																Y										
RR-0047		Y																												
RR-0048		Y						Y																						
RR-0049																				Y							Y			

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0050		Y																												
RR-0051																				Y							Y			
RR-0052																				Y							Y			
RR-0053																				Y							Y			
RR-0054																												Y		
RR-0055		Y										Y					Y											Y		
RR-0056	Y								Y																					Y
RR-0057				Y																							Y			
RR-0058																												Y		
RR-0059																				Y							Y			
RR-0060		Y		Y																										
RR-0061																				Y							Y			
RR-0062		Y																												
RR-0063		Y																												
RR-0064		Y		Y																Y							Y			
RR-0065				Y													Y													
RR-0066																												Y		

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0067																									Y		Y			
RR-0068				Y																										
RR-0069		Y	Y								Y																Y	Y		
RR-0070																	Y													
RR-0071		Y																		Y							Y			
RR-0072		Y																												
RR-0073																				Y							Y			
RR-0074					Y		Y																							
RR-0075		Y																									Y			
RR-0076		Y	Y			Y		Y												Y						Y	Y			
RR-0077		Y		Y																							Y			
RR-0078		Y		Y								Y					Y		Y	Y							Y			
RR-0079		Y																												
RR-0080		Y																												
RR-0081																				Y							Y			
RR-0082						Y																								

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0083																				Y										
RR-0084																				Y							Y			
RR-0085									Y																					
RR-0086		Y						Y												Y										
RR-0087																				Y							Y			
RR-0088		Y																										Y		
RR-0089						Y																								
RR-0090																				Y							Y			
RR-0091						Y																								
RR-0092		Y										Y																		
RR-0093																				Y							Y			
RR-0094			Y		Y	Y																								
RR-0095																				Y							Y			
RR-0096		Y																							Y					
RR-0097		Y						Y		Y																				
RR-0098		Y																												
RR-0099		Y																												

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0100																				Y							Y			
RR-0101		Y																												
RR-0102		Y																												
RR-0103										Y		Y																Y		
RR-0104		Y																												
RR-0105			Y																	Y							Y			
RR-0106						Y		Y	Y																					
RR-0107		Y																												
RR-0108		Y																												
RR-0109			Y					Y				Y			Y									Y						
RR-0110												Y					Y													
RR-0111		Y																												
RR-0112												Y																		
RR-0113	Y	Y					Y	Y																						
RR-0114			Y																						Y					
RR-0115							Y																							
RR-0116		Y																												

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RR-0117																				Y									Y	
RR-0118				Y																							Y			
RR-0119																				Y										
RR-0120																				Y							Y			
RR-0121																				Y							Y			
RR-0122						Y																Y								
RR-0123		Y																												
RR-0124																				Y							Y			
RR-0125																														Y
RR-0126		Y																									Y			
RR-0127		Y											Y																	
RR-0128								Y																						
RR-0129																								Y						
RR-0130		Y		Y			Y											Y		Y							Y			
RR-0131										Y	Y						Y			Y				Y						
RR-0132																				Y										
RR-0133																											Y			

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0134		Y										Y							Y								Y			
RR-0135																				Y							Y			
RR-0136		Y																												
RR-0137																				Y							Y			
RR-0138																											Y			
RR-0139												Y					Y			Y					Y					
RR-0140																												Y		
RR-0141																				Y							Y			
RR-0142																				Y							Y			
RR-0143		Y																												
RR-0144		Y		Y																								Y		
RR-0145		Y																									Y			
RR-0146																				Y							Y			
RR-0147																				Y										
RR-0148						Y																								
RR-0149						Y																								
RR-0150																				Y							Y			

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0151		Y																												
RR-0152		Y																												
RR-0153																				Y							Y			
RR-0154		Y															Y													
RR-0155		Y																												
RR-0156						Y																								
RR-0157																				Y										
RR-0158		Y															Y													
RR-0159																				Y					Y					
RR-0160																				Y							Y			
RR-0161		Y																												
RR-0162						Y																								
RR-0163																				Y							Y			
RR-0164		Y										Y								Y							Y			
RR-0165												Y	Y																	
RR-0166		Y			Y																							Y		
RR-0167		Y	Y	Y			Y			Y		Y					Y											Y		

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RR-0168		Y								Y																	Y			
RR-0169																											Y			
RR-0170																				Y							Y			
RR-0171		Y				Y																								
RR-0172																											Y			
RR-0173		Y																												
RR-0174				Y																										
RR-0175								Y		Y		Y	Y																	
RR-0176						Y	Y										Y													
RR-0177		Y																												
RR-0178		Y																												
RR-0179		Y																												
RR-0180		Y					Y																							
RR-0181																											Y			
RR-0182				Y																										
RR-0183																				Y										
RR-0184												Y																		

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0185		Y																												
RR-0186																				Y							Y			
RR-0187																				Y							Y			
RR-0188				Y																										
RR-0189				Y																										
RR-0190																												Y		
RR-0191								Y																						
RR-0192		Y	Y									Y								Y							Y	Y		
RR-0193		Y		Y								Y					Y	Y		Y							Y	Y		
RR-0194						Y																								
RR-0195												Y																		
RR-0196							Y																							
RR-0197							Y					Y															Y			
RR-0198																				Y										
RR-0199																				Y							Y			
RR-0200																											Y			
RR-0201		Y																												

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0202																				Y							Y			
RR-0203				Y																Y							Y			
RR-0204			Y	Y	Y												Y													
RR-0205		Y				Y		Y				Y					Y			Y				Y						
RR-0206							Y																							
RR-0207		Y	Y		Y			Y				Y																		
RR-0208		Y		Y			Y																				Y	Y		
RR-0209				Y																										
RR-0210				Y																										
RR-0211						Y																							Y	
RR-0212		Y		Y																Y					Y			Y		
RR-0213																												Y		
RR-0214		Y																												
RR-0215																				Y										
RR-0216																				Y							Y			
RR-0217																				Y							Y			
RR-0218						Y																								

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0219		Y										Y							Y									Y		
RR-0220		Y																												
RR-0221		Y																												
RR-0222		Y															Y													
RR-0223																				Y							Y			
RR-0224		Y																												
RR-0225						Y																							Y	
RR-0226		Y											Y				Y			Y										
RR-0227																									Y					
RR-0228												Y					Y			Y							Y			
RR-0229																								Y						
RR-0230		Y					Y													Y							Y			
RR-0231																				Y							Y	Y		
RR-0232		Y	Y									Y																		
RR-0233																				Y							Y			
RR-0234																												Y		
RR-0235		Y						Y									Y		Y											

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0236		Y																												
RR-0237													Y																	
RR-0238					Y																									
RR-0239																				Y							Y			
RR-0240		Y																										Y		
RR-0241		Y						Y				Y																		
RR-0242		Y																												
RR-0243						Y																								
RR-0244		Y						Y				Y								Y				Y						
RR-0245																				Y							Y			
RR-0246		Y															Y			Y				Y			Y	Y		
RR-0247																				Y							Y			
RR-0248		Y																												
RR-0249																				Y							Y			
RR-0250																				Y							Y			
RR-0251						Y																								
RR-0252																	Y													

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RR-0253		Y																	Y	Y					Y		Y			
RR-0254		Y			Y			Y		Y							Y													
RR-0255		Y	Y				Y					Y								Y								Y			
RR-0256	Y					Y																								
RR-0257		Y		Y						Y							Y													
RR-0258												Y								Y								Y			
RR-0259		Y																												
RR-0260																												Y	Y		
RR-0261		Y					Y																								
RR-0262		Y		Y															Y											
RR-0263		Y	Y	Y	Y						Y						Y								Y			Y		
RR-0264			Y	Y															Y					Y		Y				
RR-0265				Y				Y																						
RR-0266																				Y							Y			
RR-0267													Y																	
RR-0268		Y											Y																	
RR-0269												Y																		

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RR-0270		Y																		Y										
RR-0271																												Y		
RR-0272		Y																												
RR-0273		Y																		Y							Y			
RR-0274																				Y							Y			
RR-0275							Y					Y													Y		Y	Y		
RR-0276		Y																												
RR-0277											Y																			
RR-0278						Y																								
RR-0279						Y																								
RR-0280						Y																								
RR-0281																												Y		
RR-0282		Y																												
RR-0283																				Y							Y			
RR-0284								Y				Y																		
RR-0285																				Y							Y			
RR-0286		Y								Y							Y													

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RR-0287			Y														Y													
RR-0288		Y																						Y						
RR-0289				Y																								Y		
RR-0290		Y																												
RR-0291										Y																				
RR-0292																				Y							Y			
RR-0293		Y					Y		Y	Y		Y			Y		Y			Y										
RR-0294		Y																									Y	Y		
RR-0295		Y																		Y					Y		Y	Y		
RR-0296		Y					Y													Y					Y		Y			
RR-0297						Y																								
RR-0298	Y																									Y				
RR-0299																												Y		
RR-0300		Y																												
RR-0301		Y					Y																				Y			
RR-0302																				Y										
RR-0303							Y																							

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RR-0304		Y																												
RR-0305		Y		Y	Y		Y	Y				Y	Y		Y															
RR-0306		Y																												
RR-0307	Y		Y				Y	Y		Y																				
RR-0308				Y										Y						Y										
RR-0309						Y																Y								
RR-0310						Y																								
RR-0311										Y																				
RR-0312		Y													Y															
RR-0313		Y	Y	Y	Y			Y									Y	Y							Y					
RR-0314																				Y							Y			
RR-0315																				Y							Y			
RR-0316																				Y										
RR-0317		Y																												
RR-0318																				Y							Y			
RR-0319				Y																										
RR-0320																								Y						

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RR-0321																				Y							Y			
RR-0322																				Y							Y			
RR-0323		Y										Y					Y		Y					Y						
RR-0324		Y										Y																Y		
RR-0325		Y															Y										Y			
RR-0326		Y																												
RR-0327						Y																								
RR-0328																	Y													
RR-0329																				Y							Y			
RR-0330																									Y					
RR-0331		Y																												
RR-0332		Y																												
RR-0333		Y								Y																				
RR-0334								Y									Y							Y						
RR-0335							Y																							
RR-0336		Y																												
RR-0337								Y																						

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RR-0338		Y																												
RR-0339							Y																							
RR-0340												Y																		
RR-0341		Y																									Y			
RR-0342		Y																												
RR-0343		Y															Y			Y					Y		Y			
RR-0344												Y																		
RR-0345		Y		Y															Y	Y										
RR-0346																				Y							Y			
RR-0347		Y	Y																											
RR-0348																												Y		
RR-0349								Y									Y								Y					
RR-0350																				Y							Y			
RR-0351		Y	Y	Y								Y								Y					Y		Y			
RR-0352																				Y							Y			
RR-0353		Y			Y																							Y		
RR-0354		Y		Y								Y					Y		Y					Y						

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RR-0355	Y		Y	Y				Y									Y							Y						
RR-0356																				Y							Y			
RR-0357		Y						Y																				Y		
RR-0358				Y																										
RR-0359		Y																												
RR-0360		Y																									Y	Y		
RR-0361									Y																					
RR-0362													Y																	
RR-0363																				Y							Y			
RR-0364		Y					Y												Y	Y				Y						
RR-0365												Y																Y		
RR-0366				Y													Y			Y										
RR-0367					Y																									
RR-0368	Y	Y	Y	Y	Y	Y	Y	Y				Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		
RR-0369	Y						Y	Y																						
RR-0370								Y																						
RR-0371		Y	Y									Y			Y		Y		Y	Y							Y	Y		

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RR-0372																				Y										
RR-0373																				Y							Y			
RR-0374						Y																								
RR-0375						Y																								
RR-0376																				Y							Y			
RR-0377		Y										Y					Y								Y		Y			
RR-0378																				Y							Y			
RR-0379		Y	Y														Y			Y				Y	Y		Y			
RR-0380									Y																					
RR-0381				Y			Y	Y									Y										Y			
RR-0382		Y										Y	Y												Y			Y		
RR-0383						Y																								
RR-0384		Y																							Y		Y			
RR-0385		Y								Y							Y			Y										
RR-0386													Y																	
RR-0387																				Y							Y			
RR-0388																				Y										

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RR-0389																											Y			
RR-0390																				Y							Y			
RR-0391			Y				Y	Y		Y		Y	Y				Y			Y				Y						
RR-0392																Y														
RR-0393						Y																								
RR-0394		Y																						Y						
RR-0395																		Y												
RR-0396																														Y
RR-0397		Y																												
RR-0398		Y																												
RR-0399				Y																										
RR-0400																				Y							Y			
RR-0401																									Y					
RR-0402																				Y										
RR-0403				Y													Y			Y				Y						
RR-0404		Y	Y				Y										Y			Y				Y	Y		Y			
RR-0405						Y																								

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RR-0406										Y																				
RR-0407							Y													Y										
RR-0408		Y																									Y	Y		
RR-0409																	Y													
RR-0410				Y													Y													
RR-0411									Y																					
RR-0412		Y																												
RR-0413	Y																													
RR-0414				Y													Y			Y							Y			
RR-0415																												Y		
RR-0416								Y																				Y		
RR-0417				Y								Y								Y					Y			Y		
RR-0418		Y	Y	Y																Y							Y			
RR-0419		Y		Y																										
RR-0420		Y	Y					Y									Y							Y						
RR-0421												Y					Y			Y										
RR-0422					Y																									

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RR-0423																				Y							Y			
RR-0424																												Y		
RR-0425																				Y							Y			
RR-0426		Y		Y								Y					Y		Y					Y						
RR-0427		Y					Y					Y							Y								Y			
RR-0428																				Y										
RR-0429													Y																	
RR-0430							Y																							
RR-0431		Y																												
RR-0432																				Y							Y			
RR-0433		Y																												
RR-0434																				Y							Y			
RR-0435		Y																												
RR-0436													Y																	
RR-0437		Y	Y	Y			Y			Y																	Y	Y		
RR-0438		Y															Y							Y						
RR-0439		Y										Y															Y	Y		

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RR-0440		Y		Y												Y											Y			
RR-0441		Y																												
RR-0442																				Y							Y			
RR-0443																												Y		
RR-0444																				Y							Y			
RR-0445																	Y								Y					
RR-0446																				Y							Y			
RR-0447																				Y							Y			
RR-0448																				Y							Y			
RR-0449							Y																							
RR-0450		Y					Y																							
RR-0451					Y																									
RR-0452		Y																		Y					Y					
RR-0453								Y																						
RR-0454			Y																	Y							Y			
RR-0455		Y								Y																		Y		
RR-0456							Y										Y													

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RR-0457							Y																							
RR-0458		Y																												
RR-0459							Y																				Y	Y		
RR-0460		Y															Y											Y		
RR-0461		Y																												
RR-0462																				Y							Y			
RR-0463		Y															Y		Y											
RR-0464																				Y							Y			
RR-0465																				Y							Y			
RR-0466				Y													Y													
RR-0467																				Y							Y			
RR-0468		Y																										Y		
RR-0469																											Y			
RR-0470																				Y							Y			
RR-0471																				Y							Y			
RR-0472						Y																								
RR-0473		Y																												

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RR-0474		Y	Y	Y						Y							Y													
RR-0475				Y								Y								Y							Y			
RR-0476																												Y		
RR-0477																				Y							Y			
RR-0478		Y																												
RR-0479		Y	Y																								Y			
RR-0480		Y																												
RR-0481		Y																												
RR-0482		Y																												
RR-0483		Y		Y																					Y			Y		
RR-0484																											Y			
RR-0485		Y		Y								Y																		
RR-0486				Y																										
RR-0487		Y																												
RR-0488												Y																		
RR-0489			Y	Y		Y			Y															Y						
RR-0490				Y																										

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RR-0491	Y	Y										Y																		
RR-0492																	Y			Y				Y						
RR-0493																												Y		
RR-0494												Y																		
RR-0495							Y																							
RR-0496		Y																												
RR-0497		Y																												
RR-0498				Y	Y			Y									Y							Y						
RR-0499								Y																						
RR-0500												Y																		
RR-0501							Y																							
RR-0502	Y	Y																												
RR-0503																				Y							Y			
RR-0504		Y																												
RR-0505																				Y							Y			
RR-0506		Y																	Y											
RR-0507		Y																									Y			

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RR-0508		Y									Y																			
RR-0509																				Y							Y			
RR-0510			Y														Y							Y						
RR-0511						Y		Y			Y																	Y		
RR-0512		Y																												
RR-0513		Y																												
RR-0514		Y																												
RR-0515																				Y							Y			
RR-0516		Y																		Y					Y		Y			
RR-0517		Y	Y							Y							Y			Y							Y			
RR-0518		Y		Y								Y					Y		Y											
RR-0519																											Y			
RR-0520		Y			Y			Y											Y											
RR-0521		Y					Y					Y					Y													
RR-0522										Y																				
RR-0523																				Y							Y			
RR-0524							Y					Y								Y										

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RR-0525																				Y							Y			
RR-0526																				Y							Y			
RR-0527																				Y					Y		Y			
RR-0528																				Y							Y			
RR-0529																												Y		
RR-0530								Y				Y																		
RR-0531																				Y							Y			
RR-0532		Y																												
RR-0533																				Y							Y			
RR-0534		Y		Y	Y															Y										
RR-0535		Y															Y								Y					
RR-0536		Y																		Y										
RR-0537		Y					Y																		Y		Y	Y		
RR-0538																				Y							Y			
RR-0539																											Y	Y		
RR-0540																				Y							Y			
RR-0541		Y																									Y			

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RR-0542																											Y	Y		
RR-0543																				Y							Y			
RR-0544						Y																								
RR-0545																				Y										
RR-0546		Y																		Y										
RR-0547																				Y							Y			
RR-0548								Y			Y				Y															
RR-0549																				Y							Y			
RR-0550							Y																							
RR-0551												Y	Y				Y			Y					Y					
RR-0552		Y			Y			Y												Y							Y			
RR-0553				Y																										
RR-0554																				Y							Y			
RR-0555		Y											Y												Y			Y		
RR-0556							Y																							
RR-0557	Y	Y						Y					Y												Y					
RR-0558	Y	Y	Y	Y															Y	Y								Y		

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RR-0559		Y																												
RR-0560				Y																Y							Y			
RR-0561																				Y							Y			
RR-0562																											Y			
RR-0563																				Y										
RR-0564																				Y							Y			
RR-0565																				Y										
RR-0566		Y															Y								Y					
RR-0567		Y		Y	Y							Y													Y		Y			
RR-0568		Y																												
RR-0569												Y							Y											
RR-0570																				Y							Y			
RR-0571		Y																												
RR-0572		Y						Y		Y										Y					Y		Y			
RR-0573					Y			Y																				Y		
RR-0574																				Y							Y			
RR-0575		Y			Y												Y			Y						Y	Y			

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RR-0576		Y	Y		Y	Y	Y										Y			Y				Y	Y	Y	Y			
RR-0577																											Y			
RR-0578		Y																							Y					
RR-0579																			Y											
RR-0580		Y																	Y								Y			
RR-0581																				Y							Y			
RR-0582		Y		Y								Y					Y		Y					Y						
RR-0583							Y	Y												Y										
RR-0584						Y																								
RR-0585		Y						Y																						
RR-0586		Y			Y												Y								Y			Y		
RR-0587																											Y			
RR-0588																	Y			Y							Y			
RR-0589				Y																										
RR-0590																									Y					
RR-0591		Y																												
RR-0592																				Y										

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RR-0593					Y															Y						Y		Y		
RR-0594																	Y								Y			Y		
RR-0595																				Y							Y			
RR-0596																				Y							Y			
RR-0597				Y																								Y		
RR-0598																				Y							Y			
RR-0599																												Y		
RR-0600		Y		Y								Y								Y										
RR-0601																				Y							Y			
RR-0602				Y																										
RR-0603																				Y										
RR-0604		Y								Y																				
RR-0605		Y	Y					Y			Y		Y																	Y
RR-0606		Y		Y			Y					Y															Y			
RR-0607																											Y			
RR-0608	Y	Y								Y		Y																		
RR-0609																				Y							Y			

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RR-0610																	Y			Y				Y	Y					
RR-0611																				Y							Y			
RR-0612		Y																									Y			
RR-0613		Y																												
RR-0614												Y								Y					Y					
RR-0615																				Y							Y			
RR-0616					Y							Y																		
RR-0617																				Y							Y			
RR-0618									Y																					
RR-0619																												Y		
RR-0620																				Y							Y			
RR-0621																				Y							Y			
RR-0622																				Y							Y			
RR-0623						Y																								
RR-0624																	Y										Y			
RR-0625		Y		Y				Y				Y																Y		
RR-0626																				Y							Y			

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RR-0627		Y																									Y			
RR-0628		Y		Y	Y						Y	Y	Y				Y												Y	
RR-0629		Y		Y																							Y			
RR-0630																				Y							Y			
RR-0631												Y																		
RR-0632				Y																										
RR-0633						Y																								
RR-0634		Y																					Y		Y					
RR-0635		Y																												
RR-0636		Y																												
RR-0637		Y																												
RR-0638				Y																Y								Y		
RR-0639		Y																												
RR-0640			Y			Y														Y										
RR-0641		Y		Y								Y					Y		Y					Y						
RR-0642																											Y			
RR-0643												Y																Y		

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RR-0644		Y										Y					Y								Y					
RR-0645		Y		Y																										
RR-0646		Y			Y												Y													
RR-0647		Y																												
RR-0648		Y																												
RR-0649																					Y									
RR-0650							Y										Y								Y				Y	
RR-0651																					Y									
RR-0652		Y		Y																							Y	Y		
RR-0653																													Y	
RR-0654		Y		Y																							Y			
RR-0655				Y																										
RR-0656		Y																												
RR-0657		Y																												
RR-0658		Y																												
RR-0659																												Y		
RR-0660		Y																												

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RR-0661				Y																										
RR-0662		Y										Y																		
RR-0663								Y												Y					Y		Y			
RR-0664																	Y			Y					Y					
RR-0665											Y																			
RR-0666		Y																							Y					
RR-0667		Y						Y																						
RR-0668																				Y							Y			
RR-0669		Y																												
RR-0670		Y	Y														Y			Y							Y			
RR-0671		Y										Y																		
RR-0672		Y		Y													Y													
RR-0673																				Y							Y			
RR-0674			Y			Y														Y										
RR-0675																	Y										Y			
RR-0676																												Y		
RR-0677		Y																		Y										

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RR-0678						Y																								
RR-0679				Y																						Y				
RR-0680		Y	Y				Y													Y					Y		Y	Y		
RR-0681						Y																								
RR-0682		Y				Y					Y	Y					Y						Y						Y	
RR-0683												Y																Y		
RR-0684																				Y							Y			
RR-0685																				Y							Y			
RR-0686																				Y							Y			
RR-0687						Y																								
RR-0688						Y																Y								
RR-0689		Y					Y					Y							Y	Y										
RR-0690						Y																								
RR-0691		Y		Y																										
RR-0692			Y																						Y			Y		
RR-0693												Y					Y													
RR-0694							Y																							

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RR-0695		Y																												
RR-0696																				Y										
RR-0697								Y				Y																		
RR-0698		Y																												
RR-0699		Y			Y																									
RR-0700								Y																						
RR-0701							Y																							
RR-0702												Y																		
RR-0703		Y										Y								Y										
RR-0704																				Y							Y			
RR-0705		Y	Y	Y																								Y		
RR-0706																												Y		
RR-0707																												Y		
RR-0708				Y						Y							Y			Y										
RR-0709		Y																												
RR-0710							Y																							
RR-0711		Y																										Y		

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RR-0712																											Y			
RR-0713		Y																												
RR-0714																	Y													
RR-0715		Y																												
RR-0716																				Y							Y			
RR-0717		Y	Y				Y													Y					Y		Y			
RR-0718		Y	Y																	Y								Y		
RR-0719		Y																												
RR-0720		Y																												
RR-0721		Y															Y										Y			
RR-0722												Y																		
RR-0723																				Y										
RR-0724								Y											Y						Y					
RR-0725												Y					Y													
RR-0726								Y																						
RR-0727		Y																												
RR-0728																				Y							Y			

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RR-0729						Y																		Y						
RR-0730			Y	Y																										
RR-0731		Y						Y									Y							Y						
RR-0732		Y	Y							Y							Y							Y	Y					
RR-0733						Y																								
RR-0734		Y																												
RR-0735		Y															Y			Y				Y						
RR-0736		Y								Y																				
RR-0737							Y																							
RR-0738		Y																												
RR-0739	Y																													
RR-0740		Y																												
RR-0741																				Y							Y			
RR-0742																												Y		
RR-0743																				Y							Y			
RR-0744		Y	Y	Y			Y			Y		Y								Y							Y	Y		
RR-0745								Y																				Y		

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RR-0746		Y															Y													
RR-0747																	Y													
RR-0748						Y																								
RR-0749		Y		Y			Y	Y																						
RR-0750		Y	Y																	Y					Y		Y			
RR-0751		Y																												
RR-0752		Y																												
RR-0753						Y																								
RR-0754		Y				Y				Y										Y					Y					
RR-0755								Y				Y					Y							Y	Y					
RR-0756																				Y							Y			
RR-0757		Y						Y				Y								Y										
RR-0758		Y																												
RR-0759				Y			Y										Y													
RR-0760												Y																		
RR-0761																									Y					
RR-0762			Y	Y													Y													

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RR-0763																				Y							Y			
RR-0764																				Y							Y			
RR-0765		Y			Y							Y							Y							Y				
RR-0766		Y																		Y							Y			
RR-0767		Y										Y					Y			Y				Y			Y			
RR-0768		Y		Y			Y	Y																						
RR-0769		Y		Y			Y	Y																				Y		
RR-0770				Y																							Y			
RR-0771																				Y							Y			
RR-0772						Y																								
RR-0773		Y		Y	Y		Y	Y		Y							Y											Y		
RR-0774																				Y							Y			
RR-0775																				Y							Y			
RR-0776		Y															Y			Y							Y			
RR-0777																											Y			
RR-0778																				Y							Y			
RR-0779																				Y							Y			

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RR-0780		Y	Y																	Y										
RR-0781																				Y							Y			
RR-0782									Y																					Y
RR-0783									Y																					
RR-0784	Y																Y			Y					Y					
RR-0785		Y																												
RR-0786		Y						Y									Y										Y			
RR-0787						Y																								
RR-0788																									Y					
RR-0789																				Y					Y					
RR-0790			Y	Y																							Y			
RR-0791																				Y										
RR-0792		Y																												
RR-0793																												Y		
RR-0794										Y																				
RR-0795		Y			Y																							Y		
RR-0796																										Y				

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-0797									Y																					
RR-0798						Y																								
RR-0799		Y																												
RR-0800																				Y							Y			
RR-0801		Y	Y																	Y							Y			
RR-0802		Y																												
RR-0803						Y																								
RR-0804						Y																								
RR-0805						Y																								
RR-0806	Y			Y								Y																		
RR-0807						Y																								
RR-0808																				Y							Y			
RR-0809		Y		Y	Y		Y										Y			Y					Y		Y			
RR-0810		Y		Y																Y					Y		Y			
RR-0811		Y	Y									Y					Y			Y				Y	Y					
RR-0812								Y																				Y		
RR-0813		Y																										Y		

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RR-0814																				Y							Y			
RR-0815																									Y					
RR-0816							Y	Y																						
RR-0817							Y										Y													
RR-0818		Y		Y			Y										Y										Y			
RR-0819		Y		Y																										
RR-0820					Y			Y																						
RR-0821																											Y			
RR-0822		Y																												
RR-0823				Y																										
RR-0824																				Y							Y			
RR-0825		Y																												
RR-0826								Y				Y																		
RR-0827		Y																												
RR-0828																												Y		
RR-0829		Y										Y								Y										
RR-0830		Y																												

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RR-0831			Y	Y				Y				Y					Y		Y	Y				Y	Y					
RR-0832		Y		Y													Y			Y										
RR-0833		Y																												
RR-0834		Y	Y	Y								Y													Y					
RR-0835						Y																								
RR-0836																											Y			
RR-0837		Y		Y																										
RR-0838		Y																												
RR-0839		Y																									Y			
RR-0840				Y	Y							Y	Y				Y									Y				
RR-0841		Y																												
RR-0842		Y																												
RR-0843											Y																			
RR-0844		Y																									Y	Y		
RR-0845											Y																			
RR-0846								Y									Y													
RR-0847				Y			Y										Y													

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RR-0848																				Y							Y			
RR-0849								Y				Y					Y							Y	Y					
RR-0850		Y																												
RR-0851																												Y		
RR-0852		Y																									Y			
RR-0853		Y																									Y			
RR-0854										Y																				
RR-0855				Y																										
RR-0856		Y																												
RR-0857		Y										Y																		
RR-0858																										Y				
RR-0859																												Y		
RR-0860		Y																												
RR-0861																				Y							Y			
RR-0862	Y						Y										Y	Y	Y		Y									Y
RR-0863						Y	Y					Y								Y						Y				
RR-0864		Y	Y	Y																										

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RR-0865		Y						Y		Y							Y			Y				Y						
RR-0866		Y					Y													Y					Y		Y			
RR-0867										Y																				
RR-0868																				Y							Y			
RR-0869			Y	Y								Y																Y		
RR-0870		Y																												
RR-0871	Y																													
RR-0872										Y																		Y		
RR-0873								Y																Y						
RR-0874																				Y										
RR-0875																	Y													
RR-0876																											Y			
RR-0877		Y																												
RR-0878		Y																												
RR-0879																				Y							Y			
RR-0880		Y		Y			Y										Y			Y				Y	Y		Y			
RR-0881		Y										Y					Y			Y							Y			

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RR-0882		Y																												
RR-0883		Y																												
RR-0884												Y																		
RR-0885						Y																								
RR-0886												Y																		
RR-0887																				Y							Y			
RR-0888																				Y							Y			
RR-0889																				Y							Y			
RR-0890		Y																												
RR-0891													Y																	
RR-0892		Y																									Y			
RR-0893																				Y							Y			
RR-0894																												Y		
RR-0895		Y																												
RR-0896				Y																										
RR-0897		Y						Y				Y								Y							Y			
RR-0898		Y																												

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RR-0899																				Y							Y			
RR-0900		Y		Y															Y									Y		
RR-0901		Y		Y													Y			Y					Y		Y			
RR-0902		Y										Y																		
RR-0903		Y																												
RR-0904		Y																									Y			
RR-0905		Y								Y																				
RR-0906						Y																								
RR-0907		Y																												
RR-0908		Y						Y		Y							Y													
RR-0909																												Y		
RR-0910																				Y							Y			
RR-0911		Y																												
RR-0912								Y																						
RR-0913																	Y			Y				Y						
RR-0914																				Y										
RR-0915		Y			Y					Y		Y				Y														

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RR-0916												Y					Y													
RR-0917		Y																							Y		Y	Y		
RR-0918		Y		Y	Y																							Y		
RR-0919		Y						Y																	Y					
RR-0920		Y			Y		Y	Y									Y			Y				Y			Y			
RR-0921						Y																								
RR-0922																				Y							Y			
RR-0923				Y			Y																							
RR-0924		Y																												
RR-0925		Y																												
RR-0926																				Y							Y			
RR-0927		Y																												
RR-0928																				Y							Y			
RR-0929		Y		Y						Y							Y			Y				Y						
RR-0930							Y			Y			Y				Y		Y											
RR-0931		Y	Y																											
RR-0932																											Y			

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RR-0933								Y																						
RR-0934						Y				Y									Y											
RR-0935																				Y					Y					
RR-0936																				Y							Y			
RR-0937		Y																												
RR-0938		Y																												
RR-0939		Y			Y					Y																				
RR-0940																												Y		
RR-0941								Y																						
RR-0942	Y																			Y										
RR-0943						Y	Y	Y									Y	Y	Y					Y	Y					
RR-0944						Y	Y	Y									Y	Y	Y					Y	Y					
RR-0945		Y	Y				Y										Y			Y				Y	Y		Y			
RR-0946						Y																								
RR-0947		Y										Y					Y													
RR-0948												Y							Y											
RR-0949						Y																								

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RR-0950						Y																								
RR-0951												Y																		
RR-0952						Y																								
RR-0953																												Y		
RR-0954					Y	Y																						Y		
RR-0955		Y	Y	Y																								Y		
RR-0956																				Y							Y			
RR-0957																												Y		
RR-0958																				Y							Y			
RR-0959																				Y							Y			
RR-0960																												Y		
RR-0961		Y																												
RR-0962			Y					Y			Y						Y			Y				Y						
RR-0963		Y																							Y					
RR-0964																				Y							Y			
RR-0965					Y																							Y		
RR-0966								Y																						

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RR-0967																				Y							Y			
RR-0968		Y					Y			Y							Y			Y				Y	Y					
RR-0969																				Y							Y			
RR-0970							Y			Y										Y							Y			
RR-0971		Y			Y																						Y			
RR-0972																				Y							Y			
RR-0973		Y		Y			Y	Y									Y													
RR-0974		Y										Y																		
RR-0975						Y																								
RR-0976																				Y							Y			
RR-0977																									Y					
RR-0978																												Y		
RR-0979																												Y		
RR-0980		Y	Y				Y	Y												Y							Y	Y		
RR-0981																				Y							Y			
RR-0982																				Y							Y			
RR-0983																												Y		

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RR-0984		Y										Y																		
RR-0985		Y																												
RR-0986		Y			Y							Y	Y				Y									Y				
RR-0987		Y		Y																							Y	Y		
RR-0988																												Y		
RR-0989																											Y			
RR-0990		Y															Y			Y				Y			Y			
RR-0991		Y									Y																			
RR-0992																								Y						
RR-0993		Y																Y		Y										
RR-0994		Y																										Y		
RR-0995		Y																												
RR-0996																														Y
RR-0997																														Y
RR-0998	Y																									Y				
RR-0999						Y																								
RR-1000						Y																								

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RR-1001		Y		Y		Y																								
RR-1002		Y																												
RR-1003																				Y							Y			
RR-1004		Y															Y							Y	Y					
RR-1005							Y																							
RR-1006		Y	Y				Y										Y			Y				Y	Y		Y			
RR-1007		Y					Y	Y				Y																Y		
RR-1008		Y																	Y								Y	Y		
RR-1009	Y																													
RR-1010		Y																									Y	Y		
RR-1011																				Y							Y			
RR-1012		Y															Y							Y						
RR-1013					Y																									
RR-1014		Y	Y				Y	Y									Y			Y				Y						
RR-1015				Y																										
RR-1016																												Y		
RR-1017		Y										Y					Y										Y			

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RR-1018		Y																												
RR-1019		Y																												
RR-1020		Y																												
RR-1021						Y																				Y				
RR-1022			Y															Y		Y										
RR-1023																											Y			
RR-1024																				Y							Y			
RR-1025																				Y							Y			
RR-1026																				Y										
RR-1027																												Y		
RR-1028																				Y							Y			
RR-1029		Y	Y																											
RR-1030																				Y							Y			
RR-1031																				Y							Y			
RR-1032													Y																	
RR-1033																				Y							Y			
RR-1034		Y															Y									Y				

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RR-1035				Y													Y													
RR-1036		Y																		Y							Y			
RR-1037																												Y		
RR-1038																				Y							Y			
RR-1039								Y																						
RR-1040		Y											Y																	
RR-1041												Y																Y		
RR-1042						Y																								
RR-1043			Y	Y				Y									Y							Y	Y		Y			
RR-1044				Y																										
RR-1045						Y																								
RR-1046		Y											Y			Y														
RR-1047												Y																		
RR-1048		Y																												
RR-1049																				Y										
RR-1050																				Y							Y			
RR-1051		Y																												

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RR-1052		Y	Y				Y	Y												Y							Y	Y		
RR-1053		Y																												
RR-1054		Y								Y			Y		Y		Y		Y								Y			
RR-1055									Y																					
RR-1056						Y																								
RR-1057		Y			Y		Y			Y		Y					Y										Y	Y		
RR-1058		Y						Y				Y																		
RR-1059		Y													Y												Y			
RR-1060						Y																								
RR-1061																				Y										
RR-1062						Y																								
RR-1063						Y																								
RR-1064												Y																		
RR-1065						Y																								
RR-1066		Y																		Y							Y			
RR-1067																											Y			
RR-1068			Y									Y																		

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-1069						Y																								
RR-1070						Y																								
RR-1071		Y		Y	Y			Y				Y					Y		Y											
RR-1072								Y	Y				Y																	
RR-1073						Y																								
RR-1074			Y			Y																								
RR-1075						Y																Y								
RR-1076						Y			Y																					
RR-1077						Y			Y																					
RR-1078						Y																								
RR-1079		Y					Y																				Y	Y		
RR-1080	Y																													
RR-1081															Y															
RR-1082		Y				Y	Y	Y									Y		Y					Y						
RR-1083	Y																													
RR-1084																				Y							Y			
RR-1085		Y																												

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-1086																											Y			
RR-1087																				Y							Y			
RR-1088																				Y							Y			
RR-1089																				Y							Y			
RR-1090		Y	Y		Y																									
RR-1091							Y																							
RR-1092																									Y					
RR-1093		Y										Y	Y			Y	Y										Y		Y	
RR-1094		Y		Y													Y										Y			
RR-1095																				Y							Y			
RR-1096																											Y			
RR-1097																				Y							Y			
RR-1098													Y																	
RR-1099		Y																												
RR-1100		Y																									Y	Y		
RR-1101		Y											Y																Y	
RR-1102			Y																	Y					Y		Y			

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-1103		Y			Y			Y									Y			Y										
RR-1104																				Y							Y			
RR-1105																	Y								Y					
RR-1106		Y								Y															Y		Y	Y		
RR-1107						Y						Y	Y				Y										Y		Y	
RR-1108		Y																												
RR-1109										Y																				
RR-1110		Y						Y		Y																		Y		
RR-1111		Y	Y	Y			Y			Y							Y			Y					Y		Y			
RR-1112		Y								Y		Y								Y							Y			
RR-1113																				Y							Y			
RR-1114						Y																								
RR-1115		Y																												
RR-1116																	Y													
RR-1117		Y																												
RR-1118												Y																		
RR-1119									Y																					

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-1120								Y					Y				Y			Y				Y			Y			
RR-1121		Y																												
RR-1122																												Y		
RR-1123		Y																										Y		
RR-1124		Y																												
RR-1125						Y																								
RR-1126		Y	Y				Y	Y									Y			Y				Y			Y			
RR-1127																												Y		
RR-1128		Y																												
RR-1129																											Y			
RR-1130		Y															Y										Y			
RR-1131	Y																													
RR-1132	Y																													
RR-1133		Y																												
RR-1134		Y				Y																					Y	Y		
RR-1135																												Y		
RR-1136		Y																												

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Examining Authority Reference Number	DCO and Consents	Need for the Project	Planning Statement and Policy	Route Selection, Modal Alternatives and Assessment of Reasonable Alternatives	Consultation and Engagement	Land and Compulsory Acquisition	Design of Roads, Tunnels, and WCH Provision	Construction (General and Highways)	Construction (Tunnels and Utilities)	Operation and Maintenance	Charging	Traffic and Economics	Wider Network Impacts	Sustainability	Socio-economics	EIA Methodology	Air Quality	Cultural Heritage	Landscape and Visual	Terrestrial Biodiversity	Marine Biodiversity	Geology and Soils	Material Assets and Waste	Noise and Vibration	Population and Human Health	Road Drainage and the Water Environment	Climate	Cumulative Effects	Nitrogen Deposition	Protective Provisions
RR-1137		Y																												
RR-1138																				Y										
RR-1139		Y																		Y										
RR-1140																											Y			
RR-1141																				Y							Y			
RR-1142				Y																										
RR-1143												Y																		
RR-1144																												Y		
RR-1145					Y		Y													Y										
RR-1146																				Y										
RR-1147																				Y							Y			
RR-TC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	

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Table A.2 Examining Authority references and Interested Parties

Reference	Interested Party
RR-0001	AA Peluso
RR-0002	Absolute Action Ltd
RR-0003	Adam
RR-0004	Adam Holloway MP
RR-0005	Aisha Saher
RR-0006	Akin Mojola
RR-0007	Alan Dolan
RR-0008	Alan Howard
RR-0009	Alan Last
RR-0010	Alan Paul Camfield
RR-0011	Alan Turner
RR-0012	Alan Wade
RR-0013	Alasdair John Foden
RR-0014	Alec Nelson
RR-0015	Alex Acott
RR-0016	Alex Bigham
RR-0017	Alex Haniewicz
RR-0018	Alexander Campbell
RR-0019	Ali Parsons
RR-0020	Alice Whitaker
RR-0021	Alison Campbell
RR-0022	Alison Clayton
RR-0023	Alison Cogger
RR-0024	Alison Craig
RR-0025	Alison Shepherd
RR-0026	Alison Wingfield
RR-0027	Alistair Baxter
RR-0028	Amanda Dockrill
RR-0029	Amanda Wolsey
RR-0030	Amy Cole
RR-0031	Amy Mansfield
RR-0032	Andre Hewitt
RR-0033	Andrea Goring
RR-0034	Andrea Kay

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Reference	Interested Party
RR-0035	Andrea Mason
RR-0036	Andrew Allman
RR-0037	Andrew Baker
RR-0038	Andrew Briffett
RR-0039	Andrew Charlton
RR-0040	Andrew Cox
RR-0041	Andrew Craig
RR-0042	Andrew Davies
RR-0043	Andrew Gill-Cogan
RR-0044	Andrew Goatly
RR-0045	Andrew Keeler
RR-0046	Andrew Moore
RR-0047	Andrew Smith
RR-0048	Andrew Thompson
RR-0049	Angela Davy
RR-0050	Angela Jones
RR-0051	Angela Kurton
RR-0052	Angela Lewington
RR-0053	Angela Mary Brace
RR-0054	Angela Rackham
RR-0055	Angharad Johnson
RR-0056	Anglian Water Services Ltd
RR-0057	Angus Hewlett
RR-0058	Ann Batson
RR-0059	Anna Brown
RR-0060	Anna Bryant
RR-0061	Anna Hilbery
RR-0062	Anna Louise Sparrow
RR-0063	Anna-Marie Nash
RR-0064	Anne Bulman
RR-0065	Anne Copeland
RR-0066	Anne Morgan
RR-0067	Anne Pease
RR-0068	Anne Rea
RR-0069	Anne Robinson

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Reference	Interested Party
RR-0070	Annette Fletcher
RR-0071	Annie Webster
RR-0072	Anthony Barry Barton
RR-0073	Anthony Biggs
RR-0074	Anthony Mack
RR-0075	Anthony Rae
RR-0076	Antony Hughes
RR-0077	Antony Starns
RR-0078	Arundel SCATE South Coast Alliance for Transport & Environment
RR-0079	Ashley Roger Hambridge
RR-0080	Aubrey Nestor
RR-0081	Autumn Worboys
RR-0082	Avis House (Nominees) Limited
RR-0083	Badger Trust
RR-0084	Bailey Tait
RR-0085	Barking Power Limited
RR-0086	Barry David George Osborne
RR-0087	Barry Fleet
RR-0088	Barry Goodwin
RR-0089	Barry Hawkins
RR-0090	Barry West
RR-0091	Baylis Family
RR-0092	Bean Residents Association
RR-0093	Belinda Burns
RR-0094	Bellway Homes Limited
RR-0095	Ben Mott
RR-0096	Bertie Ramsden
RR-0097	Bev Lang
RR-0098	Bhoseok Nam
RR-0099	Bill Hollis
RR-0100	Bill Stallard
RR-0101	Bill Wiseman
RR-0102	Bluewater (Landsec)
RR-0103	Bob Baker
RR-0104	Bonnie Hinz

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Reference	Interested Party
RR-0105	Brenda Andrews
RR-0106	Brenda Angell (Brenda Angell)
RR-0107	Brian Dobson
RR-0108	Brian Lishak
RR-0109	Brian Martin
RR-0110	Brian Maurice Murphy
RR-0111	Brian Pearson
RR-0112	Brian Seeger
RR-0113	Brian Smith
RR-0114	Brian Young
RR-0115	British Horse Society (on behalf of Kent)
RR-0116	Bruce Michael Drew
RR-0117	Buglife- The Invertebrate Conservation Trust
RR-0118	Bulphan Village Community Forum
RR-0119	Bumblebee Conservation Trust
RR-0120	C Fenwick
RR-0121	C Fox
RR-0122	C H L Mott & M Mott
RR-0123	C Stubbings
RR-0124	C.Dawson
RR-0125	Cadent Gas Limited
RR-0126	Camille Simonet
RR-0127	Canterbury City Council
RR-0128	Carol Goldsmith
RR-0129	Carol Lawson
RR-0130	Carol Rintoul
RR-0131	Carole Anne Watling
RR-0132	Carole Wingrove
RR-0133	Caroline Beattie-Merriman
RR-0134	Carolyn Ager
RR-0135	Carolyn McAllister
RR-0136	Carolyn Richards
RR-0137	Caron Willans
RR-0138	Caspar Hughes
RR-0139	Catherine Hoggarth

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Reference	Interested Party
RR-0140	Catherine Sisterson
RR-0141	Catherine Waterhouse
RR-0142	Cathryn McGuinness
RR-0143	Celia Burns
RR-0144	Chadwell St Mary Centre
RR-0145	Charles Perceval
RR-0146	Charlotte Hall
RR-0147	Charlotte Lyons
RR-0148	Cheale Group Limited
RR-0149	Chelmsford Diocesan Board of Finance (CDBF)
RR-0150	Chloe O'Donnell
RR-0151	Chris Gillham
RR-0152	Chris Hossack
RR-0153	Chris Todd
RR-0154	Chris White
RR-0155	Chris Windle
RR-0156	Christine Barnes
RR-0157	Christine Bell
RR-0158	Christine Board
RR-0159	Christine Burden
RR-0160	Christine Cliburn
RR-0161	Christine Scott
RR-0162	Christopher Scott Padfield
RR-0163	Christopher Sewell
RR-0164	Christopher Wright
RR-0165	Christopher Zgoda
RR-0166	Church of St Mary the Virgin, Chalk
RR-0167	Claire Richardson
RR-0168	Claire Walker
RR-0169	Clare Baker
RR-0170	Clare Clemens
RR-0171	Clearserve Ltd
RR-0172	Climate Emergency Planning and Policy
RR-0173	Clive Graeme Bramley
RR-0174	Clive James Rea

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Reference	Interested Party
RR-0175	Cobham Parish Council
RR-0176	Cole Family
RR-0177	Coleen
RR-0178	Colette Hammond
RR-0179	Colin Cooper
RR-0180	Colin Dearman
RR-0181	Colin Ettinger
RR-0182	Colin Hardy
RR-0183	Colin Horwood
RR-0184	Colin Ivin
RR-0185	Colin Johnson
RR-0186	Colin Kidner
RR-0187	Colin Lambert
RR-0188	Colin Randall
RR-0189	ConnctedCities ltd
RR-0190	Coranne Marney
RR-0191	Councillor Sue Sammons
RR-0192	CPRE Essex
RR-0193	CPRE Kent
RR-0194	Cranham Golf Course Ltd
RR-0195	Cuxton Parish Council
RR-0196	Cycle Advocacy Network
RR-0197	Cycling UK
RR-0198	Cyril Gregory
RR-0199	Damien Bell
RR-0200	Dan Harwood
RR-0201	Dan Williams
RR-0202	Daniel Higgs
RR-0203	Daniel Smith
RR-0204	Daphne Revell
RR-0205	Daren Thomas
RR-0206	Darren Bartholomew
RR-0207	Dartford Borough Council
RR-0208	Dave Walker
RR-0209	David Allen

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Reference	Interested Party
RR-0210	David Archer
RR-0211	David Attwood
RR-0212	David Baker
RR-0213	David Bowling
RR-0214	David Boyd
RR-0215	David Burbridge
RR-0216	David Chivers
RR-0217	David Cowlbeck
RR-0218	David Creamer - Foxhounds Riding School & Tack Shop
RR-0219	David Gates
RR-0220	David Irwin
RR-0221	David James
RR-0222	David Kay
RR-0223	David Ketley
RR-0224	David Livitt
RR-0225	David Malcolm South
RR-0226	David Martindale
RR-0227	David Mcsweeney
RR-0228	David Morton
RR-0229	David Penman
RR-0230	David Plumb
RR-0231	David Reynolds
RR-0232	David Robert Plant
RR-0233	David Sawkins
RR-0234	David Shilston
RR-0235	David Smith
RR-0236	David Spence
RR-0237	David Thomas
RR-0238	David Walland
RR-0239	David Whybrow
RR-0240	David Williams
RR-0241	David Woods
RR-0242	Dawn Sibley
RR-0243	Dean Bradbrook
RR-0244	Dean Lincoln

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Reference	Interested Party
RR-0245	Deanne Attreed
RR-0246	Debbie Preston-Low
RR-0247	Deborah Reynolds
RR-0248	Debra Barrell
RR-0249	Debra Malyon
RR-0250	Dee Noble
RR-0251	DeGiorgio Holdings Limited
RR-0252	Denise Drain
RR-0253	Denise Lorne
RR-0254	Denise Mulchrone
RR-0255	Dennis English
RR-0256	Department for Transport
RR-0257	Derek Gunner Parkinson
RR-0258	Derek Kortlandt
RR-0259	Derek Maslin
RR-0260	Derek West
RR-0261	DHL Supply Chain Ltd
RR-0262	Diana Childs
RR-0263	Diana Zachau
RR-0264	Dickens' Country Protection Society
RR-0265	Dobinson Michael
RR-0266	Donna Goddard
RR-0267	Dover District Council
RR-0268	Dover Harbour Board
RR-0269	Dr D J van Rest
RR-0270	Dr David Macpherson
RR-0271	Dr E Thompson
RR-0272	Dr Elinor Thompson
RR-0273	Dr James Stevens
RR-0274	Dr Susan Huggett
RR-0275	Dr Tim Stout
RR-0276	Duncan Foster
RR-0277	Duncan Victor Simons
RR-0278	E and K Benton Limited
RR-0279	E W Ballard Holdings Limited

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Reference	Interested Party
RR-0280	EA Strategic Land LLP
RR-0281	Eamonn Mooney
RR-0282	Ed Kimatta
RR-0283	Edward Barratt
RR-0284	Elaine Denmead
RR-0285	Elaine Rogers
RR-0286	Elizabeth Bruce
RR-0287	Elizabeth Mary Murphy
RR-0288	Elke Browning
RR-0289	Ellie Beadle
RR-0290	Elwyn Lloyd Jones
RR-0291	Emergency Services and Safety Partners Steering Group
RR-0292	Emily McParland
RR-0293	Emma Edwards
RR-0294	Emma Lawrence
RR-0295	Emma Nicholson
RR-0296	Emma Tristram
RR-0297	Enovert South Limited
RR-0298	Environment Agency
RR-0299	Erik Paul ter Brake
RR-0300	Erwin Go
RR-0301	Essex Area Ramblers
RR-0302	Essex Badger Protection Group
RR-0303	Essex Bridleways Association
RR-0304	Essex Chambers of Commerce & Industry Ltd
RR-0305	Essex County Council
RR-0306	Essex Developers Group
RR-0307	Essex Police
RR-0308	Essex Wildlife Trust
RR-0309	Esso Petroleum Company, Limited
RR-0310	European Metal Recycling Limited
RR-0311	Farrukh Naeem Khan-Sherwani
RR-0312	Federation of Small Businesses
RR-0313	Fiona Bunton
RR-0314	Fiona Marshall

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Reference	Interested Party
RR-0315	Fleur Derbyshire-Fox
RR-0316	Forestry Commission
RR-0317	Frances Sladden
RR-0318	Francesca Burke
RR-0319	Francis Dunne
RR-0320	Francis Wilson
RR-0321	Frank Street
RR-0322	Frank Talbot
RR-0323	Frank Woollard
RR-0324	Fraser Massey
RR-0325	Frederick Kilner
RR-0326	G W Clemence
RR-0327	Gagg Family
RR-0328	Gail Chard
RR-0329	Gail Farrow
RR-0330	Gareth Byrne
RR-0331	Gareth Johnson MP
RR-0332	Gareth Oakland
RR-0333	Gary Bradbury
RR-0334	Gary Davidoff
RR-0335	Gary Davies
RR-0336	Gary Fitzgerald
RR-0337	Gary Flowers
RR-0338	Gaz Driver
RR-0339	Gemma Benton
RR-0340	Geoff Edwards
RR-0341	Geoffrey Carlton-Smith
RR-0342	Geoffrey Martin Gibbs
RR-0343	George Fereday
RR-0344	George Moffat
RR-0345	Gerald Kells
RR-0346	Gerry Larkin
RR-0347	Giles Dadd
RR-0348	Gill Gilmour
RR-0349	Gillian Davidoff

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Reference	Interested Party
RR-0350	Gillian Jones
RR-0351	Gina Armstrong
RR-0352	Ginny Still
RR-0353	Gladys Vellamaa
RR-0354	Glen Platt
RR-0355	Glenn Daniels
RR-0356	Glenys Jackson
RR-0357	Global Mutual
RR-0358	Glyn Jarvis
RR-0359	Gordon Goldsmith
RR-0360	Gordon Hayers
RR-0361	Graeme Peterson
RR-0362	Graham Bates
RR-0363	Graham Cogger
RR-0364	Graham Glombek
RR-0365	Graham Horsler
RR-0366	Graham Parker
RR-0367	Graham Pike
RR-0368	Gravesham Borough Council
RR-0369	Gravesham Rights of Way Committee
RR-0370	Great Warley Conservation Society
RR-0371	Greater North Kent
RR-0372	Greener Camping Club of GB
RR-0373	Greg Gilmore
RR-0374	Gressier Family
RR-0375	GRT Holdings Limited
RR-0376	Guy Wootton
RR-0377	Gwyneth Jones
RR-0378	Hannah Stewart
RR-0379	Hanne Lene Schierff
RR-0380	Harry Rayner
RR-0381	Havering Cyclists
RR-0382	Hazel Cox
RR-0383	Helen Burgess
RR-0384	Helen Fooks

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Reference	Interested Party
RR-0385	Helen Martin
RR-0386	Helen Whately MP
RR-0387	Helen Wood
RR-0388	Hellen Brown
RR-0389	Henrietta Bewley
RR-0390	Henry Binns
RR-0391	Higham Parish Council
RR-0392	Hilary Davies
RR-0393	Hill Residential Ltd
RR-0394	Hills Leslie
RR-0395	Historic England
RR-0396	HS1 Limited
RR-0397	Hutchison Ports
RR-0398	Ian Brown
RR-0399	Ian Carter
RR-0400	Ian Cotgrove
RR-0401	Ian Isaac
RR-0402	Ian Noble
RR-0403	Ian Pirie
RR-0404	Imogen Slater
RR-0405	Ingrebourne Valley Limited
RR-0406	Inoventech Ltd
RR-0407	Inspire You Wellbeing Ltd
RR-0408	Irene Hamilton
RR-0409	Irene Hoysted
RR-0410	Iris Buffoni
RR-0411	ITS TECHNOLOGY GROUP LIMITED
RR-0412	Ivan Murray-Smith
RR-0413	J Dand
RR-0414	J Montgomerie
RR-0415	J Tester
RR-0416	J Whitehead
RR-0417	J. Merriott
RR-0418	J.Shippam
RR-0419	Jackie Doyle-Price MP

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Reference	Interested Party
RR-0420	Jackie Wells
RR-0421	Jacqueline Cooper
RR-0422	Jacqueline Turner
RR-0423	Jacqui Bedding
RR-0424	Jacqui Mann
RR-0425	Jacqui Shannon
RR-0426	Jaime Anderson
RR-0427	Jaki Penfold
RR-0428	James Adams
RR-0429	James Booth
RR-0430	James Gillies
RR-0431	James Harkins
RR-0432	James Keith William GARDINER
RR-0433	James Mullan
RR-0434	James Stewart-Evans
RR-0435	James Thompson
RR-0436	James Wiggins
RR-0437	James Willis
RR-0438	Jamie Clark
RR-0439	Jamie Russell
RR-0440	Jan Davis
RR-0441	Jan Green
RR-0442	Jan Marshall
RR-0443	Jane Frances Cross
RR-0444	Jane Giffould
RR-0445	Jane Higgins
RR-0446	Jane Ponton
RR-0447	Jane Smith
RR-0448	Janet Dunford
RR-0449	Janet Middleton
RR-0450	Janet Murray
RR-0451	Janet Winch
RR-0452	Janice McAleavey
RR-0453	Janie Biegun
RR-0454	Jean Norton

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Reference	Interested Party
RR-0455	Jean Rogers
RR-0456	Jeanette Hogan
RR-0457	Jeanette Wellard
RR-0458	Jeff Belmour
RR-0459	Jeff Stafford
RR-0460	Jenny Scott-Thompson
RR-0461	Jeremy Stanyard
RR-0462	Jessica Alborough
RR-0463	Jill Barnett
RR-0464	Jill Bruce
RR-0465	Jill Duckworth
RR-0466	Jim Harkins
RR-0467	Jimmy Allan
RR-0468	Jo Kemp
RR-0469	Joanna Haigh
RR-0470	Joanna Harmsworth
RR-0471	Joanne Standing
RR-0472	Joanne Taylor
RR-0473	John Awty
RR-0474	John Blake
RR-0475	John Booth
RR-0476	John Bradley
RR-0477	John Camp
RR-0478	John Cheeseman
RR-0479	John Conway
RR-0480	John Cooper
RR-0481	John Corbett
RR-0482	John David Fish
RR-0483	John Dighton
RR-0484	John Edwin Burgess
RR-0485	John Elliott
RR-0486	John England
RR-0487	John Fox
RR-0488	John Goff
RR-0489	John Gostling

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Reference	Interested Party
RR-0490	John Green
RR-0491	John Harold Anthony Taylor MIVR MILT
RR-0492	John Harrison
RR-0493	John Hughes
RR-0494	John Johnson
RR-0495	John McCann
RR-0496	John Otley
RR-0497	John Prescott
RR-0498	John Purkiss
RR-0499	John Short
RR-0500	John Stewart
RR-0501	John White
RR-0502	Jon Ruben
RR-0503	Jonathan Fox
RR-0504	Jonathan Olney
RR-0505	Jonathan Pittock
RR-0506	Jonathan Roy Mullett
RR-0507	Joseph Downie
RR-0508	Joseph Patrick Finnegan
RR-0509	Josephine Delaney
RR-0510	Joshua Kay
RR-0511	Joshua Maurel
RR-0512	Joyce Bell
RR-0513	Joyce Hill
RR-0514	Judith De St Croix
RR-0515	Judith Reed
RR-0516	Julia Broad
RR-0517	Julia Colley
RR-0518	Julia Deeley
RR-0519	Julia Guest
RR-0520	Julia Lopez MP
RR-0521	Julian Howes
RR-0522	Julian Quinton
RR-0523	Julie Chaney
RR-0524	Julie Cooke

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Reference	Interested Party
RR-0525	Julie Eve
RR-0526	Julie Harris
RR-0527	Julie Johnson
RR-0528	Julie Salter
RR-0529	Julie Wetherall
RR-0530	June Watson
RR-0531	Karen Calder
RR-0532	Karen Fitzgerald
RR-0533	Karen Liff
RR-0534	Karen Moore
RR-0535	Karen Richardson-Judd
RR-0536	Karin Munro
RR-0537	Karine Suhrbier
RR-0538	Karla Ann Bohn
RR-0539	Kate Geary
RR-0540	Kate Hayward
RR-0541	Kate Soper
RR-0542	Kate Styles
RR-0543	Kathleen Jolly
RR-0544	Kathryn Homes Limited
RR-0545	Kathryn Turner
RR-0546	Kathryn Westell
RR-0547	Katy Jarrett
RR-0548	Keith Banks
RR-0549	Keith Morris
RR-0550	Keith Tomlins
RR-0551	Kelly Tolhurst MP
RR-0552	Kelvin Moon
RR-0553	Ken Bowman
RR-0554	Kenny Knowles
RR-0555	Kent & Medway Economic Partnership
RR-0556	Kent Countryside Access Forum
RR-0557	Kent County Council
RR-0558	Kent Downs AONB Unit
RR-0559	Kent Invicta Chamber of Commerce

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Reference	Interested Party
RR-0560	Kent Wildlife Trust
RR-0561	Kerry Creamer
RR-0562	Kerstin Oloff
RR-0563	Kevin Coombes
RR-0564	Kevin Cox
RR-0565	Kevin Johncock
RR-0566	Kevin Tilson
RR-0567	Kieran Dyer
RR-0568	Kimberley Dennis
RR-0569	Kimberley Richardson
RR-0570	Kirstie Tomlin
RR-0571	Lance Paul
RR-0572	Laura Blake
RR-0573	Laura Hicks
RR-0574	Lauren Cosson
RR-0575	Lauren Rayner
RR-0576	Leigh Hughes
RR-0577	Leo Borwick
RR-0578	Leonard Colin Gaunt
RR-0579	Leonidas Peppard
RR-0580	Les Gamester
RR-0581	Lesley Cornish
RR-0582	Lesley Goodwin
RR-0583	Lesley Keefe
RR-0584	Lesley Quigley
RR-0585	Leslie Newell
RR-0586	Letrois Bernard
RR-0587	Linda Allen
RR-0588	Linda Beard
RR-0589	Linda Catton
RR-0590	Linda Dolan
RR-0591	Linda Hall
RR-0592	Linda Helsey
RR-0593	Linda Holland
RR-0594	Linda Jones

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Reference	Interested Party
RR-0595	Linda Margaret Reynolds
RR-0596	Lindsey Squire
RR-0597	Lindsey White
RR-0598	Lisa Derbyshire
RR-0599	Lisa Gouge
RR-0600	Lisa Payne
RR-0601	Lisa Rollisson
RR-0602	Lisa Scott
RR-0603	Liz Brandon-Jones
RR-0604	Logistics UK
RR-0605	London Borough of Havering
RR-0606	London Cycling Campaign
RR-0607	London Friends of the Earth Network
RR-0608	London Gateway Port Limited
RR-0609	Lorna Cannon
RR-0610	Lorraine Jackman
RR-0611	Louise Ismail
RR-0612	Louise Macpherson
RR-0613	Lucy Bubb
RR-0614	Lucy Grant
RR-0615	Lucy Marum
RR-0616	Luddesdown Parish Council
RR-0617	Luke Klein
RR-0618	Lumen Technologies UK Limited (formerly CenturyLink)
RR-0619	Lynda Kay
RR-0620	Lynda Townend
RR-0621	Lynette Adams
RR-0622	Lynne Henderson
RR-0623	M Osborne
RR-0624	M Salter
RR-0625	M. B. Leahy
RR-0626	Madeleine Wells
RR-0627	MAG
RR-0628	Maidstone Borough Council
RR-0629	Mair Bain

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Reference	Interested Party
RR-0630	Malcolm Baber
RR-0631	Malcolm McKee
RR-0632	Malcolm Phelps
RR-0633	Malthurst South East Limited
RR-0634	Mandy Martin
RR-0635	Manjit Atwal
RR-0636	Marc Dobroch
RR-0637	Marc Harding
RR-0638	Margaret Haig
RR-0639	Margaret Moore
RR-0640	Margaret Ockendon
RR-0641	Margaret Platt
RR-0642	Maria Bagnoli
RR-0643	Maria Guest-Naharnowicz
RR-0644	Marian Mestanek
RR-0645	Marianne Kok
RR-0646	Marianne Longhurst
RR-0647	Marie Flynn
RR-0648	Marie Frost
RR-0649	Marine Management Organisation
RR-0650	Marion Money
RR-0651	Maritime and Coastguard Agency
RR-0652	Marj Powner
RR-0653	Mark Bavin
RR-0654	Mark Coleman
RR-0655	Mark Costin
RR-0656	Mark Easter
RR-0657	Mark Edge
RR-0658	Mark Gunns
RR-0659	Mark R Bird
RR-0660	Mark Scutt
RR-0661	Mark Sullivan MRTPI
RR-0662	Mark Teeton
RR-0663	Mark Warnett
RR-0664	Mark William Sopher

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Reference	Interested Party
RR-0665	Markus Schmidt
RR-0666	Martin Bryant
RR-0667	Martin Carroll
RR-0668	Martin Stitchman
RR-0669	Martin Walker
RR-0670	Mary Clare Martin
RR-0671	Matthew Fooks
RR-0672	Matthew Jackson
RR-0673	Matthew Turner
RR-0674	Matthew William Ockendon
RR-0675	Maud Waret
RR-0676	Maureen Hattam
RR-0677	Maurice Leigh
RR-0678	Mayor's Office for Policing and Crime
RR-0679	Mbeko Sihwa
RR-0680	MD Elliott
RR-0681	Medebridge Solar Limited
RR-0682	Medway Council
RR-0683	Medway Labour and Cooperative Group
RR-0684	Mel Flaxman
RR-0685	Mel Perry
RR-0686	Melanie Waddoups
RR-0687	Melburg
RR-0688	Melville Hamilton Lowe Mott
RR-0689	Meopham Parish Council
RR-0690	Metropolitan Police Service
RR-0691	Metrotidal Limited
RR-0692	Michael Anthony Tarbard
RR-0693	Michael Ashby
RR-0694	Michael Bannister
RR-0695	Michael Bilton
RR-0696	Michael Brooks
RR-0697	Michael Coates
RR-0698	Michael Cox
RR-0699	Michael Dovey

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Reference	Interested Party
RR-0700	Michael Doyle
RR-0701	Michael Dwyer
RR-0702	Michael Farman
RR-0703	Michael Harris
RR-0704	Michael Jiggens
RR-0705	Michael John Saunders
RR-0706	Michael Marlow
RR-0707	Michael Newens
RR-0708	Michael Portwain
RR-0709	Michael Shipway
RR-0710	Michael Smoker
RR-0711	Michael Spurr
RR-0712	Michael Stanway
RR-0713	Michael Vine
RR-0714	Mikala Malpass
RR-0715	Mike Peters
RR-0716	Mike Stringer
RR-0717	Mike Tristram
RR-0718	Miss Christine Ann Salter
RR-0719	Mnika Davis
RR-0720	Moira Brock
RR-0721	Monica Saunders
RR-0722	Morzine Limited c/o Graham Stark
RR-0723	Mr Alan Goldsworthy
RR-0724	Mr Alan Sanderson
RR-0725	Mr Anthony G Scott
RR-0726	Mr Chris Forsyth
RR-0727	Mr Chris Jones
RR-0728	Mr Cristian J Ramis
RR-0729	Mr David Barron
RR-0730	Mr Graham Grice
RR-0731	Mr Graham Neill
RR-0732	Mr Ian Black
RR-0733	Mr John Anthony White
RR-0734	Mr John F Reymond BSc CEng MIET

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Reference	Interested Party
RR-0735	Mr John Thacker
RR-0736	Mr Jonathan Baker
RR-0737	Mr Michael Beiley
RR-0738	Mr Michael Durrant
RR-0739	Mr Michael Enifer
RR-0740	Mr Paul Walford BA(Hons)
RR-0741	Mr Peter Johnson
RR-0742	Mr Richard Claridge
RR-0743	Mr Robert W Owen
RR-0744	Mr Robin Bull
RR-0745	Mr Shaun Barrell
RR-0746	Mr Simon Daniel
RR-0747	Mr. C. Hounsell
RR-0748	Mrs Antoinette Schatzmann
RR-0749	Mrs Christine Rouse
RR-0750	Mrs Fay Plumb
RR-0751	Mrs Gill Stembridge
RR-0752	Mrs Heather E Colver
RR-0753	Mrs J. Carver
RR-0754	Mrs Janet Vera Gray
RR-0755	Mrs Katherine Hicks
RR-0756	Mrs L A Knowles
RR-0757	Mrs Lin Weiss
RR-0758	Mrs Lynne Fish
RR-0759	Mrs Marilyn Going
RR-0760	Mrs Nicola Costin
RR-0761	Mrs Pamela C March
RR-0762	Mrs Patricia Dobinson
RR-0763	Mrs S Hadwin
RR-0764	Mrs Susan Goodge
RR-0765	Mrs Susan Lindley
RR-0766	Mrs Veronica Washington
RR-0767	Mrs Vivien King
RR-0768	Mrs. F. Ball
RR-0769	Mrs. Jacqueline Thacker

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Reference	Interested Party
RR-0770	Ms Alison M Chisholm
RR-0771	Ms M J Jenkins
RR-0772	Mulberry Strategic Land Limited
RR-0773	Muriel Blake
RR-0774	Muriel Cornwell
RR-0775	Myles Cook
RR-0776	Naomi Cooper
RR-0777	Naomi Doran
RR-0778	Naomi Eckersley
RR-0779	Natalie Lewis
RR-0780	Natasha Clark
RR-0781	Natasha Mound
RR-0782	National Gas Transmission
RR-0783	National Grid Electricity Transmission Plc
RR-0784	Natural England
RR-0785	Neil Camp
RR-0786	Neil Harrod
RR-0787	Network Rail Infrastructure Limited
RR-0788	NHS Kent and Medway
RR-0789	Nick Andrews
RR-0790	Nick Jukes
RR-0791	Nick Macnab
RR-0792	Nick Power
RR-0793	Nicola Ovey
RR-0794	Nigel Fern
RR-0795	Nigel Irvine Bourne
RR-0796	North Kent Marshes Internal Drainage Board
RR-0797	Northumbrian Water Limited (operating as Essex & Suffolk Water)
RR-0798	Ockendon Solar Limited
RR-0799	Ola George
RR-0800	Olga Ruocco Daley
RR-0801	Oliver Platts
RR-0802	Opportunity South Essex
RR-0803	Orsett Fen Right Holders
RR-0804	Orsett Golf Club

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Reference	Interested Party
RR-0805	Orsett Showground
RR-0806	Owen Berkeley-Hill
RR-0807	Owners of RK & D Shearer
RR-0808	Pam Jones
RR-0809	Pamela Bunton
RR-0810	Pat Baker
RR-0811	Patricia Ann Sparrow
RR-0812	Patricia Giddings
RR-0813	Patricia Janice Lang
RR-0814	Patricia Webster
RR-0815	Patricia Wykes
RR-0816	Patrick Lewarne
RR-0817	Paul Brice
RR-0818	Paul Cole
RR-0819	Paul Elliott
RR-0820	Paul Fisher
RR-0821	Paul Gill
RR-0822	Paul Howard
RR-0823	Paul Howsam
RR-0824	Paul King
RR-0825	Paul Mercer
RR-0826	Paul Parmenter
RR-0827	Paul Reed
RR-0828	Paul Scott
RR-0829	Paula Boeg
RR-0830	Paula Clarke
RR-0831	Pauline Clifton
RR-0832	Pauline Smith
RR-0833	Peel Ports Ltd
RR-0834	Penny Ellmore
RR-0835	Persimmon Homes Essex
RR-0836	Peter Alan Braben
RR-0837	Peter Booth
RR-0838	Peter Booth
RR-0839	Peter Caton

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Reference	Interested Party
RR-0840	Peter de Klerk
RR-0841	Peter Graves
RR-0842	Peter Hill
RR-0843	Peter Hill
RR-0844	Peter Le Warne
RR-0845	Peter Masson
RR-0846	Peter Nash
RR-0847	Peter North
RR-0848	Peter Rowe
RR-0849	Peter Saunders
RR-0850	Peter Skelton
RR-0851	Peter Slowe
RR-0852	Peter Somerville
RR-0853	Peter Still
RR-0854	Peter Thomas
RR-0855	Phil Church
RR-0856	Phil Stanier
RR-0857	Philip Healy
RR-0858	Philip Leonard Edgar
RR-0859	Philip Maber
RR-0860	Philip Rickard
RR-0861	Pippa Hepburn
RR-0862	Port of London Authority
RR-0863	Port of Tilbury London Limited
RR-0864	Professor Phil Goodwin
RR-0865	Punam Chada
RR-0866	Quentin Daniel
RR-0867	R Lingham
RR-0868	Rachel Cross
RR-0869	Ralph A Tebbutt
RR-0870	Ralph Cochrane
RR-0871	Ranjit Pattar
RR-0872	Ray Hockley
RR-0873	Ray Sheehan
RR-0874	Ray Styles

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Reference	Interested Party
RR-0875	Raymond alan Murray
RR-0876	Raymond Hill
RR-0877	Raymond Jackson
RR-0878	Raymond Krystofiak
RR-0879	Rebecca Fricker
RR-0880	Rebecca Lush
RR-0881	Rebecca Reynolds
RR-0882	Rebekah Marsh
RR-0883	Recycled In Orsett Ltd
RR-0884	Redrow Homes Limited
RR-0885	Rees Hales
RR-0886	Reg Ramm
RR-0887	Ria Bejko-Cowlbeck
RR-0888	Rich Yates
RR-0889	Richard Chew
RR-0890	Richard Edward Meredith
RR-0891	Richard Gethin
RR-0892	Richard Hawker
RR-0893	Richard Hayward
RR-0894	Richard Jackman
RR-0895	Richard Jones
RR-0896	Richard Keegan
RR-0897	Richard Pool
RR-0898	Richard Wheeler
RR-0899	Richard Worn
RR-0900	Rick Pedler
RR-0901	Rimrose Valley Friends / Save Rimrose Valley
RR-0902	Ripe Now Limited
RR-0903	Rita Bateman
RR-0904	Rita Godfrey
RR-0905	Road Haulage Association (RHA) Ltd
RR-0906	Rob Cox
RR-0907	Rob Sibley
RR-0908	Robert Blake
RR-0909	Robert Cassels

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Reference	Interested Party
RR-0910	Robert Goodrick
RR-0911	Robert Hall
RR-0912	Robert Heath
RR-0913	Robert Kelly
RR-0914	Robert Knight
RR-0915	Robert Lane
RR-0916	Robert Oliver
RR-0917	Robert Rogers
RR-0918	Robert Rudge
RR-0919	Robert Syrett
RR-0920	Robert William Quick
RR-0921	Robert Wynn
RR-0922	Robin Ball
RR-0923	Robin Beard
RR-0924	Robin Dodridge
RR-0925	Robin Eatwell
RR-0926	Robin Walter
RR-0927	Roger Hill
RR-0928	Roger Hoodless
RR-0929	Roger Lindley
RR-0930	Roger Michael Phillips
RR-0931	Roger Slade
RR-0932	Roger Stocker
RR-0933	Ronald F.C.Ower
RR-0934	Ronald Simpson
RR-0935	Rosalind Young
RR-0936	Rosie Clarke
RR-0937	Rowland Wheatley
RR-0938	Roy Clare
RR-0939	Roy Meleady
RR-0940	Roy Tulkens
RR-0941	Royal Mail Group
RR-0942	RSPB
RR-0943	Runwood Homes Limited
RR-0944	Runwood Properties Limited

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Reference	Interested Party
RR-0945	Rupert Pitt
RR-0946	Ruskin Landscapes Limited
RR-0947	Russell Plumb
RR-0948	Rydon Homes Limited
RR-0949	S&J Padfield & Partners LLP
RR-0950	S&J Padfield Estates LLP
RR-0951	Sally Templeton
RR-0952	Sally Trussler
RR-0953	Sam Wollen
RR-0954	Samantha Bradbrook
RR-0955	Samantha List
RR-0956	Samantha Quill
RR-0957	Samantha Zoe Constance Brant
RR-0958	Sandra Ashley
RR-0959	Sandra Devine
RR-0960	Sandra Elliott
RR-0961	Sandy Scotting
RR-0962	Sappho Brammer
RR-0963	Sara Muldowney
RR-0964	Sarah Binnie
RR-0965	Sarah Daniels
RR-0966	Sarah Jane Scrace
RR-0967	Sarah Lane
RR-0968	Sarah Lovell
RR-0969	Sarah Meyer
RR-0970	Sardra Conway
RR-0971	Savannah
RR-0972	Scott Callender
RR-0973	Scott Seacombe
RR-0974	Sevenoaks District Council
RR-0975	Seventyholds Ltd
RR-0976	Sharmin Barton
RR-0977	Sharon Darby
RR-0978	Sharon Innes
RR-0979	Sharon larsen

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Reference	Interested Party
RR-0980	Sharron Peel
RR-0981	Sheena Booth
RR-0982	Sheila Dearns
RR-0983	Sheila Pearce
RR-0984	Sheila Pinkstone
RR-0985	Shirley A McCarthy
RR-0986	Shorne Parish Council
RR-0987	Simon Barber
RR-0988	Simon Johnson
RR-0989	Simon Pirani
RR-0990	Simon Rose
RR-0991	Simon Walther
RR-0992	Simon Winter
RR-0993	Slough Fort Preservation Trust
RR-0994	South Coast Alliance for Transport and the Environment
RR-0995	South East Local Enterprise Partnership
RR-0996	Southern Gas Networks PLC
RR-0997	Southern Water Services Limited
RR-0998	Sport England
RR-0999	St John's College, Cambridge
RR-1000	St Modwen Developments Limited
RR-1001	Stephen Ayley
RR-1002	Stephen Baron
RR-1003	Stephen Bickford
RR-1004	Stephen Brennan
RR-1005	Stephen Clark
RR-1006	Stephen Lang
RR-1007	Stephen Metcalfe
RR-1008	Stephen Perrett
RR-1009	Stephen Ray
RR-1010	Steve Birch
RR-1011	Steve Hackett
RR-1012	Steve Kelley
RR-1013	Steven Brace
RR-1014	Steven Edwards

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Reference	Interested Party
RR-1015	Steven Troy
RR-1016	Stewart Hammond
RR-1017	Stop the Silvertown Tunnel Coalition
RR-1018	Strategic Aviation Special Interest Group of the LGA
RR-1019	Stuart Dixon
RR-1020	Stuart Holpin
RR-1021	Stuart Mee
RR-1022	Stuart Richard Chappell
RR-1023	Suami Rocha
RR-1024	Sue Clark
RR-1025	Sue Cook
RR-1026	Sue Doidge
RR-1027	Sue Mathers
RR-1028	Sue Parnwell
RR-1029	Sue Slade
RR-1030	Susan Bejko-Cowlbeck
RR-1031	Susan Binns
RR-1032	Susan Fitzjohn
RR-1033	Susan Francis
RR-1034	Susan Hammock
RR-1035	Susan Harvey
RR-1036	Susan Higgins
RR-1037	Susan King
RR-1038	Susan Mayes
RR-1039	Suzanne Heath
RR-1040	Swale Borough Council
RR-1041	Swanley Town Council
RR-1042	Swing Rite Golf Ltd
RR-1043	Syed Qutab
RR-1044	T Turner
RR-1045	Tarmac Building Products Limited
RR-1046	Tarmac Cement and Lime Ltd
RR-1047	Taylor Wimpey
RR-1048	Terence Fox
RR-1049	Terence Haines

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Reference	Interested Party
RR-1050	Teresa Holdstock
RR-1051	Teresa Webster
RR-1052	Tessa Barnby
RR-1053	Tevva Motors
RR-1054	TfSE
RR-1055	Thames and Medway Canal Association
RR-1056	Thames Chase Trust
RR-1057	Thames Crossing Action Group
RR-1058	Thames Enterprise Park Limited
RR-1059	Thames Estuary Growth Board
RR-1060	Thames Water
RR-1061	Thamesview Camping
RR-1062	The Antoinette Schatzmann Discretionary Trust
RR-1063	The Boreham Family
RR-1064	The Church Commissioners for England
RR-1065	The Executors of the late R L Osborne
RR-1066	The Faversham Society
RR-1067	The Green Party of England and Wales
RR-1068	The Hoo Consortium
RR-1069	The landowners of the land as referenced on the Land Registry as BGL106153 – being Yue Keung Stephen Lee and Lai Yu Cheung
RR-1070	The Linford Land Group
RR-1071	The Orsett Community Forum
RR-1072	The owner/Occupiers of Foxburrows
RR-1073	The Owners and Occupiers C/O of Buxton, Princess Margaret Road
RR-1074	The owners C/O Rosenholme, Princess Margaret Road
RR-1075	The Owners of Norrskken, Station Road, East Tilbury
RR-1076	The residents of Hollycrest, Mill Lane
RR-1077	The Residents of Mill House, Mill Lane
RR-1078	The Rochester Bridge Trust
RR-1079	Thibault Jeakings
RR-1080	Thomas J Foster
RR-1081	Thompson Welding & Construction
RR-1082	Thurrock District Scout Council
RR-1083	Thurrock Power Limited

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Reference	Interested Party
RR-1084	Tim Bourne
RR-1085	Tim Matthews
RR-1086	Timothy Root
RR-1087	Timothy Vaughan
RR-1088	Tina Higginson
RR-1089	Toby Buttress
RR-1090	Toby Larkin
RR-1091	Tom Benton
RR-1092	Tom Brodie
RR-1093	Tonbridge and Malling Borough Council
RR-1094	Tonbridge and Tunbridge Wells Bicycle Users Group
RR-1095	Toni Stacey
RR-1096	Tony Bosworth
RR-1097	Tony Cocca
RR-1098	Tony Rice
RR-1099	Tony Silver
RR-1100	Tony Starns
RR-1101	Tracey Crouch CBE MP
RR-1102	Tracey Mendham
RR-1103	Tracey Payne
RR-1104	Tracy Ahern
RR-1105	Tracy White
RR-1106	Transport Action Network
RR-1107	Transport for London
RR-1108	Trevor Andrew March
RR-1109	Trevor Barham
RR-1110	Trevor James Sparrow
RR-1111	Trevor Thacker
RR-1112	Trina Dunk
RR-1113	Trudi Needham
RR-1114	Trustees of AJA Booth Voluntary Settlement c/o Michael Booth
RR-1115	Tunbridge Wells Borough Council
RR-1116	UK Health Security Agency
RR-1117	UK Regional and Business Airports (RABA) Group
RR-1118	Uniper

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Reference	Interested Party
RR-1119	United Kingdom Oil Pipelines Ltd c/o British Pipeline Agency
RR-1120	Upminster & Cranham Residents' Association
RR-1121	Usman Kabbia
RR-1122	Valerie Adams
RR-1123	Valerie Baker
RR-1124	Velimir Micic
RR-1125	Veolia ES Landfill Limited
RR-1126	Veronica Prince
RR-1127	Vince Knight
RR-1128	Vincent Hancock
RR-1129	Virginia Kirkham
RR-1130	Wandsworth Bridge Road Association
RR-1131	Warley Green Limited
RR-1132	Warren Rainforth
RR-1133	Wayne Sibley
RR-1134	Wayne Thacker
RR-1135	WELCOM Forum
RR-1136	Wendy Curtis
RR-1137	Wendy White
RR-1138	West Kent Badger Group
RR-1139	William Andrews
RR-1140	William Embliss
RR-1141	William Hamilton
RR-1142	William Jones
RR-1143	William Watson
RR-1144	William Wight
RR-1145	Woodland Trust
RR-1146	Zoe Connell
RR-1147	Zoe Kent
RR-TC	Thurrock Council*

**Thurrock Council submitted a Relevant Representation outside of the advertised period for submissions and so their reference identification is in a different format.*

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