

TR010032 Lower Thames Crossing
Gravesham response to Issues raised by National Highways on LIR

(IP ref: 20035747)

Notes

- For the most part the table only has brief comments on response [[REP2-058](#)] provided by National Highways to the Gravesham Local Impact Report
- For ease of reference each item has been given a reference – GL1.1 etc
- Where a longer response has been provided - see separate Appendices:
 - Appendix 1 Heritage Response
 - Appendix 2 Green Belt Response
- On some topics the ExQ1 questions and issues to be discussed at the relevant ISH mean that these can be dealt with more effectively by a submission at Deadline 4 drawing the threads together
- The subject and NH comment columns are the briefest of summary and reference should be made to the original to understand the detail of the subject or the comment made upon it

Ref #	LIR Ref	Subject	NH comment	GBC response
	Section 1		Introduction	
GL1.1	1.16	Discussions	Appropriate and proportionate approach	Comment stands
GL1.2	1.17	Monitoring	Commitments in dDCO, LEMP etc. meet concerns	Looking for a monitoring document that brings together all topics and clearly sets out potential actions. Accept that a degree of flexibility is needed but this should be through appropriate groups with appropriate terms of reference and governance procedures. On some issues the choice of solution depends on the weight given to different issues (e.g. landscape versus ecology versus heritage).
GL1.3	1.18	Construction will be disruptive	Accepted but number of strategies in dDCO and control documents address these	As above GL1.2
GL1.4	1.19 & 1.24	Need for further engagement and change	DCO application is the result of a rigorous process	The fundamental point that the applicant is in no different position to any other, and must avoid, mitigate or compensate for all types of impact produced by the project. Landscape impact on the Kent Downs AoNB is something that in essence cannot be mitigated and needs therefore compensation.
GL1.5	1.20	Mitigation	Application meets DMRB standards	There is still some way to go in the production of a proper mitigation and compensation package which looks across the area in the round
GL1.6	1.21	Comprehensive mechanism for engagement	Agree	Welcomed – such fora will need to have clear terms of reference, governance mechanisms and means of resolving disagreements

GL1.7	1.23	CoCP	Draws attention to latest version (REP1-157)	As above 1.21 (GL1.6)
GL1.8	1.27	s.106 Community Funds	Welcomed	Community Fund is supported as part of the wider support mechanisms for the Local Community
GL1.9	1.29	GBC s.106 asks	Detailed comment on school places	GBC is starting to refine its s.106 asks [ASA-107], considering the dDCO and control documents. It will co-ordinate with KCC and other bodies over matters of mutual interest. School places are dealt with under section 13
GL1.10	1.30	Core concerns over transport modelling, workers and monitoring	All covered by the appropriate methodology or control documents	Specific points covered elsewhere but note that many of the concerns raised by the Council are reflected in other IP's LIR/WR, as appropriate. These in turn are reflected in some of the questions in ExQ1
GL1.11	1.31	GBC asks	Detailed responses on specific points	To be considered further
GL1.12	1.33	Impact of 6-8 years construction	Refers to existing documents including Transport Assessment, ES, EEIA Regs and DMRB guidance	Council has highlighted in its Relevant Representation [RR-0368], s.106 asks [AS-070], LIR [REP1-228] and other submissions areas where improvements need to be made
GL1.13	1.34	Transport modelling implications	Response set out SoCG	Fundamental concern for both traffic and noise/air quality and related impacts
GL1.14	1.35	Monitoring and mitigations strategy	Clear strategy via dDCO and control documents	See GL1.2 above
GL1.15	1.36	Impact on Gravesham	See response to para 1.24	See GL1.4 above
GL1.16	1.37	Pitch & Putt and Southern Valley Golf Course (SVGC)	Discussions ongoing Pitch & Putt, and there remains a gap in open space provisions (SVGC – Southern Valley Golf Course)	Report produced on Pitch & Putt options, and response from applicant awaited. Open space will be dealt with in answering Q13.1.10 at Deadline 4

GL1.17	1.65, 1.66 & 1.68	Impact of project on Local Plan work	Refers to SoCG response	SoCG is not agreed, and impact is both from taking the overall implications for development from of the project into account, and the potential development options that it removes on the east side of Gravesend
GL1.18	1.67	Transport modelling for Local Plan	Applicant has supplied LTAM cordon	LTAM cordon is of no use for Local Plan work due to lack of detail in the local highway network, lack of validation on the local network and the underlying assumptions. Gravesham is following National Highways guidance on what is required for Local Plan evidence base.
	Section 2		Project Description	
GL2.1	2.30 & 2.31	Impact of one TBM	Addendum statement to be produced	The Addendum is under consideration as is the additional commitment reference MW009 in the Register of Environmental Actions and Commitments (REAC) which appears to provide the comfort requested in relation to the use of the southern portal. Meeting on 1 June was very helpful but information did not form part of the public consultation. National Highways seeking a further metring on this matter.
	Section 3		Traffic	
GL3.1	3.1	Traffic impacts	Detailed responses to specific points	In view of ISH4 and ExQ1, GBC will produce combined response for Deadline 4
GL3.2	3.4	Traffic impacts	Ditto	See GL3.1 comment
GL3.3	3.5	Traffic impacts	Ditto	See GL3.1 comment
GL3.4	3.7	Traffic impacts	Ditto	See GL3.1 comment
GL3.5	3.10	Traffic impacts	Ditto	See GL3.1 comment

GL3.6	3.14	Traffic impacts	Ditto	See GL3.1 comment
GL3.7	3.17	Traffic impacts	Ditto	See GL3.1 comment
GL3.8	3.19	Traffic impacts	Ditto	See GL3.1 comment
GL3.9	3.20	Traffic impacts	Ditto	See GL3.1 comment
GL3.10	3.21	Traffic impacts	Ditto	See GL3.1 comment
GL3.11	3.24	Traffic impacts	Ditto	See GL3.1 comment
GL3.12	3.27	Traffic impacts	Ditto	See GL3.1 comment
GL3.13	3.28	Traffic impacts	Ditto	See GL3.1 comment
GL3.14	3.29	Traffic impacts	Ditto	See GL3.1 comment
GL3.15	3.30	Traffic impacts	Ditto	See GL3.1 comment
GL3.16	3.31	Traffic impacts	Ditto	See GL3.1 comment
GL3.17	3.32	Traffic impacts	Ditto	See GL3.1 comment
GL3.18	3.33 & 3.34	Traffic impacts	Ditto	See GL3.1 comment
GL3.19	3.35	Traffic impacts	Ditto	See GL3.1 comment
GL3.20	3.37	Traffic impacts	Ditto	See GL3.1 comment
GL3.21	3.38	Traffic impacts	Ditto	See GL3.1 comment
GL3.22	3.40	Traffic impacts	Ditto	See GL3.1 comment
GL3.23	3.41	Traffic impacts	Ditto	See GL3.1 comment
GL3.24	3.43	Traffic impacts	Ditto	See GL3.1 comment
GL3.25	3.44	Traffic impacts	Ditto	See GL3.1 comment
GL3.26	3.45	Traffic impacts	Ditto	See GL3.1 comment
GL3.27	3.47	Traffic impacts	Ditto	See GL3.1 comment
GL3.28	3.48	Traffic impacts	Ditto	See GL3.1 comment

GL3.29	3.49	Traffic impacts	Ditto	See GL3.1 comment
GL3.30	3.51 & 3.52	Traffic impacts	Ditto	See GL3.1 comment
GL3.31	3.53	Traffic impacts	Ditto	See GL3.1 comment
GL3.32	3.54	Traffic impacts	Ditto	See GL3.1 comment
GL3.33	3.55	Traffic impacts	Ditto	See GL3.1 comment
GL3.34	3.57	Traffic impacts	Ditto	See GL3.1 comment
GL3.35	3.58	Traffic impacts	Ditto	See GL3.1 comment
GL3.36	3.60	Traffic impacts	Ditto	See GL3.1 comment
GL3.37	3.61	Traffic impacts	Ditto	See GL3.1 comment
GL3.38	3.63	Traffic impacts	Ditto	See GL3.1 comment
GL3.39	3.60	Traffic impacts	Ditto	See GL3.1 comment
GL3.40	3.65	Traffic impacts	Ditto	See GL3.1 comment
GL3.41	3.66	Traffic impacts	Ditto	See GL3.1 comment
GL3.42	3.67	Traffic impacts	Ditto	See GL3.1 comment
GL3.43	3.68	Traffic impacts	Ditto	See GL3.1 comment
GL3.44	3.69	Traffic impacts	Ditto	See GL3.1 comment
GL3.45	3.70	Traffic impacts	Ditto	See GL3.1 comment
GL3.46	3.71	Traffic impacts	Ditto	See GL3.1 comment
GL3.47	3.72	Traffic impacts	Ditto	See GL3.1 comment
GL3.48	3.75	Traffic impacts	Ditto	See GL3.1 comment
GL3.49	3.76	Traffic impacts	Ditto	See GL3.1 comment
GL3.50	3.77	Traffic impacts	Ditto	See GL3.1 comment
GL3.51	3.78	Traffic impacts	Ditto	See GL3.1 comment

GL3.52	3.79	Traffic impacts	Ditto	See GL3.1 comment
GL3.53	3.80	Traffic impacts	Ditto	See GL3.1 comment
GL3.54	3.81	Traffic impacts	Ditto	See GL3.1 comment
	Section 4		Construction Traffic	
GL4.1	4.7	Traffic around construction sites	Refers to oTMPfC [REP1-175] arrangements	Further discussion needed on terms of reference of the TMF and how this relates to other consultation arrangements (see GL1.6)
GL4.2	4.9	Major adverse impacts	TMP illustrative – but will be developed further by contractor	See comment above GL4.1
GL4.3	4.10	Wider traffic management: Request for full engagement	Unfair characterisation	See comment above GL4.1 – this is about the wider diversions that may be needed (e.g. when A2 is shut)
	Section 5		Air Quality	
GL5.1	5.4 – 5.6	Air quality monitoring	No significant effects therefore no mitigation required – but will engage GBC with their own monitoring	GBC does not have resources for additional monitoring, and the applicants case rests of its traffic forecasts. What does 'engage' mean in this context?
	Section 6		Cultural Heritage	
GL6.1	6.1 – 6.4	Three concerns about ES methodology	Methodology accepted at scoping and not objected to by KCC	See Appendix 1 for full Gravesham comments on the Heritage aspects
	Section 7		Landscape and visual	
GL7.1	7.2	Refers to Landscape report	Noted Appendix 7a	See comments below
GL7.2	7.3	Refers to Lighting report	Notes the points made	Further comment will be made on this issues at a future deadline

GL7.3	7.4	Overall landscape impact	Applicant says <i>Moderate adverse</i> whereas Gravesham says <i>major adverse</i>	Council does not agree. See comments below
GL7.4	7.10	Green Belt	Applicant relies on analysis in APP-500 Planning Statement Appendix E	Council considers APP-500 fails to address the task before it comprehensively. See Appendix 2 for more detailed response
GL7.5	7.12	Green Belt	ditto	See Appendix 2
GL7.6	7.15	Green Belt	ditto	See Appendix 2
GL7.7	7.16	Green Belt	ditto	See Appendix 2
GL7.8	7.17	Green Belt	ditto	See Appendix 2
GL7.9	7.18	Green Belt	ditto	See Appendix 2
GL7.10	7.19	Green Belt	ditto	See Appendix 2
GL7.11	7.20	Green Belt	ditto	See Appendix 2
GL7.12	7.25	Green Belt	ditto	See Appendix 2
GL7.13	7.27	Green Belt	ditto	See Appendix 2
GL7.14	7.29	Green Belt	ditto	See Appendix 2
GL7.15	7.30	Green Belt	ditto	See Appendix 2
GL7.16	7.31-7.36	Green Belt	ditto	See Appendix 2
GL7.17	7.37	Green Belt	ditto	See Appendix 2
GL7.18	7.38	Green Belt	ditto	See Appendix 2
GL7.19	7.39	Green Belt	ditto	See Appendix 2
GL7.20	7.40	Green Belt	ditto	See Appendix 2
GL7.21	7.41	Green Belt	ditto	See Appendix 2
GL7.22	7.42	Green Belt	ditto	See Appendix 2

GL7.23	7.43	Green Belt	ditto	See Appendix 2
GL7.24	7.44	Green Belt	ditto	See Appendix 2
GL7.25	7.45	Green Belt	ditto	See Appendix 2
GL7.26	7.46	Green Belt	ditto	See Appendix 2
GL7.27	7.47-7.49	Green Belt	ditto	See Appendix 2
GL7.28	7.50-7.54	Green Belt	ditto	See Appendix 2
GL7.29	7.55-7.58	Green Belt	ditto	See Appendix 2
GL7.30	7.59-7.66	Green Belt	ditto	See Appendix 2
GL7.31	7.67-7.68	Green Belt	ditto	See Appendix 2
			<i>LIR Landscape Appendix 7</i>	
GL7.32	Ap 7.4	Changes to landscape assessment	Maintains position on ES Chapter 7 as submitted	In view of ISH6 and ExQ1, GBC will produce combined response for Deadline 4 on these matters
GL7.33	Ap 7.6.5	Landscape Assessment	Chapter 7 as submitted is to correct methodology and the old (2020) version is not relevant	See GL7.32 comment
GL7.34	Ap 7.6.6	Changes to Cobham and Shorne LLCA's	Boundary change not significant	See GL7.32 comment
GL7.35	Ap 7.7.2	West Kent Downs and Gravesend Southern Fringe	Detailed comments on Table 7.1	See GL7.32 comment
GL7.36	Ap 7.7.6(ii)	Cultural heritage	Wider Cobham Estate	See GL7.32 comment
GL7.37	Ap 7.7.6(iii)	Brewers Road roundabout	Reinstatement will occur of any losses	See GL7.32 comment

GL7.38	Ap 7.7.9 (ii)	Impact of the scheme on AoNB	Refer to APP-384 6.3 Environmental Statement - Appendix 7.9 - Schedule of Landscape Effects	See GL7.32 comment
GL7.39	Ap 7.7.9(iii)	Impact on historic parkland	Refer to APP-384 6.3 Environmental Statement - Appendix 7.9 - Schedule of Landscape Effects	See GL7.32 comment
GL7.40	Ap 7.7.9 (iv)	Replacement/mitigation planting	See comments on 7.14.4(ii) and following below (GL7.48)	See GL7.32 comment
GL7.41	Ap 7.8.3	Construction sites visual impact	Refer to APP-140 , APP-145 , APP-204 , APP 243 , APP-385 , & REP1-157	See GL7.32 comment. ExQ1 Q12.3.6 also relates
GL7.42	Ap 7.10.1	GBC Table 7.2	Detailed comments	See GL7.32 comment
GL7.43	Ap 7.10.2	Lighting impacts	Detailed comments	See GL7.32 comment
GL7.44	Ap 7.12.1(vi)	Extent of impacts	Refers to APP-145 & APP-154	See GL7.32 comment
GL7.45	Ap 7.13.4	Assessment of sensitivity VP1	Refer to APP-235 & APP-388	See GL7.32 comment
GL7.46	Ap 7.13.5	Assessment of sensitivity VP2	Refer to APP-384 & APP-388	See GL7.32 comment
GL7.47	Ap 7.13.6	Views from Road	No view form the road currently	See GL7.32 comment
GL7.48	Ap 7.14.4(ii)	Native planting	Refer to APP-516	See GL7.32 comment
GL7.49	Ap7.14.(iv) & (v)	Screen planting	Planting is proposed to replicate existing landscape and patterns	See GL7.32 comment
GL7.50	Ap 7.14.4 (vi) & (xi)	Screening with time	See response to 7.10.1 (GL7.42)	See GL7.32 comment
GL7.51	Ap 7.14.6 (i) – (iii)	Ancient woodland compensation	Refer to oLEMP REP1-173	See GL7.32 comment
GL7.52	Ap 7.14.6 (iv)-(vii)	Comprehensive mitigation strategy	Refer to APP-509	See GL7.32 comment

GL7.53	Ap 7.15.3 (i)	Green Bridges	Refer to, APP-146, APP-384 , APP-385 , APP-509, APP-516 & REP1-173	See GL7.32 comment
GL7.54	Ap 7.15.5 (i) – (iv)	Impact on Kent Downs AoNB	Refer to APP-384 & APP-385	See GL7.32 comment
GL7.55	Ap 7.15.6 (i)	A122 junction and its setting	Additional cross sections shared	See GL7.32 comment
GL7.56	Ap 7.15.7 (ii) & (iii)	Park Pale	Refer to APP-384 & APP-385	See GL7.32 comment
GL7.57	Ap 7.15.7 (iv)	Park Pale	No justification for Green Bridge at Park Pale	See GL7.32 comment
GL7.58	Ap 7.15.8 (iii)	East of Thong	Refer to APP-516 & REP1-173	See GL7.32 comment
GL7.59	Ap 7.15.9 (vi (a))	Chalk Park	Refer to REP1-042 & REP1-173	See GL7.32 comment
GL7.60	Ap 7.15.9 (vi(b))	Hill top in Chalk Park	Performs a variety of functions – see APP-516	See GL7.32 comment
GL7.61	Ap 7.15.9 (vi(c))	Infiltration basins	Refer to APP-516	See GL7.32 comment
GL7.62	Ap 7.16.1 (i)	Photomontages	Agree locations in 2019	See GL7.32 comment
GL7.63	Ap 7.16.2 (iii)	Visual imagery	3D flythrough provided	See GL7.32 comment
	Section 8		Terrestrial Biodiversity	
GL8.1	8.5-8.8	Habitat loss	Amended design in AoNB during consultation to reduce land take	Net effect comes from utilities corridor and loss of central reservation

GL8.2	8.9-8.16	Veteran trees	Points to SoCG with KCC	Overall point is to ensure effective management and replacement for any loss of veteran trees. Content to rest the issue with KCC Ecology and Woodlands Trust.
GL8.3	8.17-8.21	Possible increased use of the North Kent marshes	No material changes predicted and not proposing to monitor	Recent site visit with National Highways to Southern Valley Golf Course (SVGC) illustrated high intensity use of that area, and some of that demand may be diverted during construction to the North Kent marshes. Matter for further discussion.
GL8.4	8.21	Severance	Highlights Green Bridges and specific Design Principles	The scheme increases severance and other IP's have concerns over the effectiveness of the Green Bridges in biodiversity terms. There is a discussion to be had about balancing the access, landscape and biodiversity functions of these which may potentially conflict with one another and may vary from bridge to bridge.
GL8.5	8.21-8.23	Air Quality, Noise and Dust	REAC commitments	Issue is about agreeing a clear monitoring strategy during construction and potential remedial actions
GL8.6	8.24-8.27	Groundwater on North Kent Marshes	REAC HR08 and RDWE033	REAC commitments welcomed but monitoring review needs to be more frequent when major activity is occurring in or under the marshes
GL8.7	8.28	Concerns of others over survey work	Application confident in submitted DCO and pre-construction surveys	Highlighted an issue raised by other IP's and content to allow them to deal with the matter

GL8.8	8.29-8.30	East of Thong	Refer to SoCG with KCC and proposed receptor site for reptiles	The Council objects to this proposal on landscape and heritage grounds, and the concept of downgrading the existing land. Noted that there is an additional site identified that the nitrogen deposition compensation sites may provide an alternative. The Council will work with the applicant, KCC and Natural England to try and find a way forward. Appendix 1 provides additional information from the Green Belt point of view
GL8.9	8.30-8.32	East of Thong	Concerns noted and will be considered in detailed design	As above GL8.8
GL8.10	8.33-8.34	Green Bridges width	History of increased width and design criteria	As set out in GL8.4 response there are potentially conflicting objectives for the Green Bridges, which increased width would assist with. The Brewers Road location is constrained but Thong Lane south could be further widened to provide flexibility.
GL8.11	8.35	Biodiversity Net Gain	Pointing out requirements are emerging and states 'the project has not claimed that it would achieve biodiversity net gain'.	Accept that requirement is new and welcome the applicant addressing the issue.
GL8.12	8.36	Light spill	Addressing the issue via Design Principles	Noted
GL8.13	8.37	Nitrogen deposition sites	oLEMP process via contractor will deal with detailed design	Point is that they should be considered in the round with all the other sites and agreement reached, as far as possible, amongst the relevant IP's
GL8.14	8.41-8.42	Wider project	Continue to engage with the Council	Positive comment welcomed but progress needed. Relates to GL8.13 as well.
	Section 9		Marine Biodiversity	

GL9.1	9.3-9.6	Discharge runoff in the marshes	Refers to proposed mitigations measures in ES Chapters 8 & 14	See GL14.2
	Section 10		Geology and Soils	
GL10.1	10.11-10.12	Unexploded Ordnance	Under 6.11 Appendix 2 CoCP pre-construction risk assessment and emergency response procedure will be prepared	Noted
	Section 11		Material Assets and Waste	
GL10.2	11.6-11.12	Hazardous waste	Revised quantities in application and references to oMHP (APP-388), oTMPfC (REP1-175) and CoCP (REP1-157)	Some of the specific queries not addressed
	Section 12		Noise and vibration	
GL12.1	12.9-12.11	Noise and vibration	No double counting and references to CoCP NV001, NV002 & NV004 inter alia	Noted. Further comments will be made at D4
GL12.2	12.12-12.14	Construction noise and vibration	Noted	Noted. Further comments will be made at D4
GL12.3	12.15-12.19	Operation noise and vibration	Focus on Henhurst Road under WNIPP (APP-545)	Noted. Further comments will be made at D4
GL12.4	12.23-12.25	Low noise surface	Earthworks and low noise surface	Noted. Further comments will be made at D4
GL12.5	12.28-12.29	Noise change to residential properties – noise barriers	Refer to APP-450	Noted. Further comments will be made at D4
GL12.6	12.30	Baseline noise surveys	Noted	Noted. Further comments will be made at D4
GL12.7	12.35	Contractor input	See CoCP NV001, NV002 & NV004 [REP1-157]	Noted. Further comments will be made at D4

GL12.8	12.37	Threshold criteria for vibration	Noted	Noted. Further comments will be made at D4
GL12.9	12.38	132Kv noise	Noted	Noted. Further comments will be made at D4
GL12.10	12.39	Inter-project cumulative noise effects	Noted	Noted. Further comments will be made at D4
GL12.11	12.43	Noise and vibration monitoring	See REAC NV009 in CoCP [REP1-157]	Noted. Further comments will be made at D4
GL12.12	12.44	s.61 needed where noise exceedances may occur	Refer to CoCP (REP1-157) NV002, NV004 & NV006	Noted. Further comments will be made at D4
GL12.13	12.45	Acoustic barriers	Refer to APP-450 & REP1-157	Noted. Further comments will be made at D4
GL12.14	12.46	Road traffic predictions	Detailed design issue	Noted. Further comments will be made at D4
GL12.15	12.47	Long term monitoring	Not intended to carry post completion noise monitoring	Noted. Further comments will be made at D4
	Section 13		Population and human health	
GL13.1	13.20-13.22	Tourism assets	A number of the assets and facilities identified in Gravesham's response are included within the assessment presented in ES Chapter 13. Some haven't i.e. outside 500m study area. GBC comment about impacts during construction, the oTMPfC [REP1-175] identifies a range of stakeholder considerations in Table 2.3	Response not recognising wider issues.
GL13.2	13.23	Events and festivals	oTMPfC [REP1-175] have been secured in the DCO in order to ensure congestion impacts are reduced during the construction phase	Confidence that oTMPfC will be sufficient is noted. Focus on congestion– no mention of other issues i.e. loss of visitor accommodation on experiential offer

GL13.3	13.30	Displacement of businesses	Businesses identified and engagement ongoing	Noted
GL13.4	13.31	Loss of Southern Valley Golf Course	The Applicant proposes to replace the area with equivalent scale of space in the form of public open space (Chalk Park which will be accessible and improve connectivity across the area and provide a recreational asset that is currently deficient in the area).	SVGC lost now. Replacement at end of project. Chalk Park is not like for like or alternative active leisure replacement
GL13.5	13.32	Southern Valley Golf Course not surplus to requirements	Applicant considers the benefits of the Project (including the need for the Project) outweigh the loss of Southern Valley Golf Club taking into account the positive proposal made by the Project to create Chalk Park which is an entirely new recreational site to be created in the same locality	Noted but not agreed
GL13.6	13.33	Baylis Landscape Contractors	Remains the Applicants preference to pursue a voluntary agreement that facilitates relocation	Noted
GL13.7	13.35-13.38	Business disruption	Where no land is taken or physically impacted, no compensation will be payable but the Applicant has developed a comprehensive set of mitigation measures set out in control documents	Noted but not accepted as the length of the construction period means the impacts are more than transitory.

GL13.8	13.39-13.44	Other NSIPs recognise potential for Projects to cause local disruption which could have adverse socio-economic impacts	Applicant considers comments are inaccurate	The Stage 2 Consultation document prepared by EDF Energy for Sizewell set out a number of areas of potential economic impact. The Stage 2 Consultation (para 5.1.2, p.35) states: <i>There would be a large increase in local employment and business opportunities during the construction phase and a long-term legacy of 900 new jobs once the station is operational. EDF Energy recognises that there are significant opportunities to maximise and support the uptake of local socio-economic benefits through targeted enhancement, initiatives and support, which define the aim and objectives of this study. However, EDF Energy recognises that there is also the potential for the Project to cause local disruption. This could have adverse socio-economic impacts, prior to mitigation.</i>
GL13.9	13.45-13.48	Private property and housing (including traveller sites)	The Applicant understands that the two sites referred to are likely to be affected by environmental change during construction and operation, but consider REAC etc sufficient	Noted but don't agree with position
GL13.10	13.49-13.54	Agricultural Land Holdings	The Applicant recognises that Gravesham Borough Council's concern relates to land-use viability in its existing use, rather than landowner compensation	But response relates to compensation

GL13.11	13.55-13.61	Loss of Cobham Services	The Applicant recognises Gravesham Borough Council's concern relating to the loss of a service station at Cobham but it is not agreed that additional provision should be considered as part of the Project, but will be considered by The Applicant Operational Directorate across the Strategic Road Network	Loss is part of the project so re-provision should be part of the project
We note that NH have not responded on 13.62 to 13.75				
GL13.12	13.76-13.80	WCH Construction	Series of detailed comments	Noted. Will respond further on this complex matter at a later deadline
GL13.13	13.83-13.88	WCH Operation	Applicant confirms proposed links will be built	Further clarity needed on some issues, including NCN177. Will respond further on this complex matter at a later deadline
GL13.14	13.90-13.95	Access to work, community, recreational, education and healthcare facilities	The oTMPfC [REP1-175], lists the envisaged affected groups, lists their outline requirements, and also details how the Traffic Management Plans (developed by the Contractors) would address their requirements as a minimum	Noted. Concern remains about reliance on future TMP
GL13.15	13.97-13.99	Meaningful input to TMP	A range of measures are in place to ensure that active travel routes for children are not adversely impacted by the Project, and to enable communication and engagement with individual schools	Noted. Concern remains about reliance on future TMP

GL13.16	13.100-13.102	Impact on Thames View Crematorium	The Applicant is aware of the sensitivity of facilities. For these reasons that the oTMPfC [REP1-175] highlights cemeteries and crematoria specifically as stakeholders who have particular requirements and that these would be addressed in the TMP	Noted. Concern remains about reliance on future TMP
GL13.17	13.105-13.111	Access to employment opportunities for local people	The SEE Strategy (appended to the Section 106 Agreements [APP-505] includes a number of obligations on the Project and its Contractors to promote employment opportunities across all skill and qualification attainment levels	Noted. Discussions ongoing on options for increased certainty of delivery
GL13.18	13.112, 13.114 & 13.117	Workforce impacts on accommodation during construction	Reiterates that not a problem	Noted but not accepted. Significant outstanding issue
GL13.19	13.123-13.131	Workforce impacts on accommodation during construction - elsewhere	Given the substantial difference in the demand/supply ratio between these two areas/projects, the Applicant does not consider this is a reasonable comparator	Noted but not accepted. Significant outstanding issue

GL13.20	13.132-13.133	GBC's practical solutions to workforce accommodation impacts	The Applicant has undertaken a robust assessment of the potential effects of the Project's non-local workforce on housing market capacity and stress, and identified a number of precautionary measures. Nonetheless the Applicant will continue to consider measures suggested by Gravesham Borough Council and is grateful for the Council's pragmatic and helpful approach to suggesting interventions it considers are required.	Willingness to consider is appreciated. Significant outstanding issue
GL13.21	13.136, 13.137 & 13.140	Population and Human Health (Mental Health and Wellbeing)	The position remains that the monitoring of health specifically or as an aggregated indicator is not proposed	Community Fund proposal is appreciated but is insufficient
GL13.22	13.141	Public able to access monitoring information	Ditto	Outstanding issue
GL13.23	13.143	Maintaining access for Emergency Services	The Applicant recognises Gravesham Borough Council's concerns and notes that this is being addressed by the Emergency Services and Safety Partner's Steering Group (ESSP SG) under their Community Impacts Consultation response recommendation 5.7	Noted
	Section 14		Road drainage and the Water Environment	
GL14.1	14.2-14.3	Road Drainage	Note Councils concern and being addressed with relevant parties	Noted

GL14.2	14.5-14.12	North Kent Marshes and extreme weather events	Rainfall only not dewatering or similar. Not practical to deal with extreme weather events	A side effect of climate change is an increase in extreme rainfall events. The construction period will remove vegetation cover and therefore increase surface runoff. The risk needs to be assessed and control measures taken
	Section 15		Climate	
GL15.1	15.2-15.10	Climate and net zero	Approaches taken to biodiversity and carbon management meet Governments objectives for 2050	Noted
	Section 16		Cumulative Effects	
GL16.1	16.7-16.8	Cumulative effects – especially on North Kent marshes	On North Kent Marshes refers to response at GL8.3	See GL8.3