

# Lower Thames Crossing

## **9.89 Responses to the Examining Authority's ExQ1 Appendix I – 13. Social, Economic & Land-Use Considerations**

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# 1 Introduction

## 1.1 Introduction

- 1.1.1 This document has been prepared by the Applicant to set out its responses to the Examining Authority's (ExA's) first round of written questions [\[PD-029\]](#)
- 1.1.2 These can be found in Tables set out under the following headings:
- a. Climate Change and carbon emissions (found in Appendix A)
  - b. Consideration of alternatives (Found in Appendix A)
  - c. Traffic and transportation (Found in Appendix B)
  - d. Air quality (Found in Appendix C)
  - e. Geology and soils (Found in Appendix D)
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  - k. Social, economic and land-use considerations (Found in Appendix I)
  - l. Draft Development Consent Order, planning obligations, agreements and adequacy of security (Found in Appendix J)
  - m. The acquisition and temporary possession of land and rights (Found in Appendix J)
  - n. General overarching questions (Found in Appendix J)

## 2 Responses to the Examining Authority's ExQ1 13

PINS ID	External Stakeholder (where applicable)	Question / Response
ExQ1_Q13.1.2	N/A	<p><b>Methodology - Land Use and Accessibility</b></p> <p>Table 13.3 of ES Chapter 13 – Population and Human Health [APP-151] identifies that the environmental value for community land and assets in the 'very high', 'high', and 'medium' classifications are based on more than 50% of a community using the asset. The Applicant is asked to explain how the relevant 'community' are defined for this purpose and how the figure of 50% was arrived at?</p> <p><b>Response:</b></p> <p>Table 13.3 of Environmental Statement (ES) Chapter 13: Population and Human Health [APP-151] sets out the criteria by which the environmental value for community land and assets are identified, in line with Design Manual for Roads and Bridges (DMRB) LA 112 Population and Human Health<sup>1</sup>. The standard identifies that for community land and assets to be categorised as 'very high', 'high', or 'medium' sensitivity, a combination of factors are used including one which states in Table 3.11 that <i>'the land and assets are used by the majority (≥50%) of the community'</i>.</p> <p>For this purpose, both 'community' and the level of likely usage has been defined using professional judgement within the framework provided in DMRB LA 112, which defines community as <i>'A group of people living in the same place or having a particular characteristic in common'</i>. Table 13.2 of ES Chapter 13: Population and Human Health [APP-151] explains <i>'The study area is based on the Order Limits plus a 500m area surrounding it. Where likely effects have been identified beyond this (for example relating to potential catchment areas of individual facilities), the study area has been extended to reflect this'</i>. It should be noted that usage by the majority of the community is one of four factors which contributes to the level of sensitivity; other factors include degree of severance between community and assets, availability of alternative assets, and frequency of use (daily, weekly and so on).</p> <p>Levels of sensitivity have been attributed to community land in Tables 13.57 and 13.58 of ES Chapter 13: Population and Human Health [APP-151] for the construction assessment, with the same sensitivity levels carried forward into Tables 13.69 and 13.70 for the operational assessment. For</p>

<sup>1</sup> National Highways (2020). Design Manual for Roads and Bridges LA 112 Population and Human Health.

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		<p>those community land receptors and assets attributed a 'very high', 'high' or 'medium' level of sensitivity, levels of use may in fact be ≤50% of the community, however, other factors (such as frequency of use) may have resulted in the receptor being placed in this category of sensitivity. A similar approach has been used in relation to the categorisation of community assets.</p>
ExQ1_Q13.1.3	N/A	<p><b>Community Woodland Hole Farm</b></p> <p>Paragraph 13.3.69 of ES Chapter 13 – Population and Human Health [APP-151] states that the environmental assessments for Population and Human Health have assumed that the mitigation and compensation planting areas at Hole Farm are in place and have begun to establish prior to the start of construction. The compensation at Hole Farm is noted to overlap with a community woodland legacy project. Can the Applicant advise whether the community woodland project has been delayed as a result of the Project and if so what effect the construction delay to the Project would have on delivery timeframes on this community woodland?</p> <p><b>Response:</b></p> <p>The Hole Farm community woodland project has not been delayed as a result of the Project, or the delay to the construction of the Project. The first 15,000 trees were planted on the site in November 2022, and a further 70,000 are intended to be planted in November/December 2023. The remaining trees will be planted the following year, following which the grassland habitats will be established. The Environmental Statement is therefore accurate in stating that mitigation and compensation planting areas at Hole Farm are in place and have begun to establish prior to the start of construction.</p> <p>A separate Town and Country Planning Act planning application (Ref. No. 23/00862/FUL) was submitted to Brentwood Borough Council in July 2023 for community infrastructure for the site which requires planning permission, including a new vehicular access into a 94-space car and coach park with electric vehicle charging points and overflow area, substation, visitor shelter, café, bin store, cycle parking and WC facilities, demolition of grain store and development of community building with associated infrastructure. The planning application is due to be determined by Brentwood Borough Council by 11 October 2023. These aspects of the community woodland project are not part of the Project, and for the avoidance of doubt, the Development Consent Order (DCO) (if made) would not authorise their construction.</p>

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ExQ1_Q13.1.5	N/A	<p><b>Tilbury Fields – Permissive Routes</b></p> <p>The creation of a new public park, known as Tilbury Fields at Goshems Farm, would include new permissive routes to allow users to reach the elevated areas. However, permissive routes can be closed at any time thereby limiting the benefit of the North Portal mitigation. Can the Applicant please clarify why dedicated rights of way have not been sought? In addition, if the permissive routes were subsequently extinguished, can the Applicant clarify what impact that would have on the usability of the new public park? Finally, the proposed new permissive routes proposed as part of Tilbury Fields are listed as not surfaced. These are routes that could experience significant use due to their location close to Coalhouse Fort. Their usability will be hindered as a result and the Applicant is asked to explain what incentive there is for the landowner to keep them appropriately maintained?</p> <p><b>Response:</b></p> <p>To provide public access through the country park at Tilbury Fields, the Applicant is proposing two north–south routes. These routes will connect to the FP200, which is proposed to be realigned and redesignated as bridleway to Two Forts Way along the shoreline of the Thames, where the Applicant proposes to resurface, widen and redesignate the footpath to a pedestrian-cycle track in readiness for similar future improvements (by others) to the west and east. The western of these routes will be designated as a permissive footpath and will follow the newly created topography to bring users to these new viewing points. The eastern route will follow an historic watercourse through the marshes and will be designated as a Public Right of Way (PRoW) footpath. There will be two permissive paths linking these routes. The proposed north–south PRoW footpath and the Two Forts Way east–west route are considered to provide valuable improvements to the existing PRoW network consistent with Thurrock Council’s aspirations to improve public access. There may be an opportunity in the future for the eastern footway through Tilbury Fields to be upgraded to bridleway/cycle route by the same third parties as the eastern works to Two Forts Way, in order to create a complete loop from Coalhouse Fort, but it is not considered appropriate to prejudice those proposals or incorporate them as part of the Project.</p> <p>Permissive routes are proposed through Tilbury Fields to allow flexibility of design. Tilbury Fields would be subject to further detailed design once the full earthwork quantities are known; therefore, the geometry, height and shape of the earthworks could be subject to change. By having permissive routes, the location and alignment of the footpaths could change as the detailed design of Tilbury Fields changes is developed.</p>

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		<p>The permissive footpaths also go through proposed open mosaic habitat and in proximity to the Thames Estuary and Marshes Ramsar site and other habitat designations on the coastline. The Applicant, therefore, considers the routes should be permissive to allow flexibility for any closures needed for maintenance, and to enable management of visitors (if required) to retain some control on the use of the footpaths, and have the ability to close, divert, or restrict use, for example restricting use by dog walkers during appropriate times of the year to minimise disruption to breeding birds.</p> <p>The requirement for the Project to provide accessible permissive routes through Tilbury Fields is secured by clause S9.02 of the Design Principles <a href="#">[REP3-110]</a> which states '<i>The new recreational site shall be publicly accessible, via the Two Forts Way in the south and from FP200 in the north. It shall incorporate accessible permissive routes through the landforms and allow users to reach the elevated areas</i>'. Tilbury Fields would be managed/owned by the Applicant. If the permissive routes require closure due to maintenance, the proposed north–south PRoW footpath and the Two Forts Way east–west route will still be open to walkers.</p> <p>Project Design Report Part E: Design for Walkers, Cyclists and Horse Riders <a href="#">[APP-512]</a>, paragraph 4.3.10, states '<i>The detailed design of these footpaths has not been undertaken. Further design of the route will ensure the surface is appropriate to the setting whilst providing a suitable robust surface.</i>' Nonetheless, Design Principles <a href="#">[REP3-110]</a> clause PEO.03 'WCH detail design' sets out that surfaces should be appropriate to the type of usage permitted and appropriate to its surrounding context as much as is reasonably practicable.</p>
ExQ1_Q13.1.6	N/A	<p><b>Benefits and Outcomes</b></p> <p>Section 2.9 of ES Chapter 2 – Project Description <a href="#">[APP-140]</a> implies that there are several legacy projects in play as part of the LTC proposal but does not explain what they are or how LTC aids their delivery. Chapter 5 of Document 7.20 - Benefits and Outcomes <a href="#">[APP-553]</a> states that over £30 million of designated funds have been allocated to Lower Thames Crossing to deliver various improvements with local partners. The Projects in Tables 5.1, 5.2 and 5.3 (totalling over £5 million) are noted to have already been funded, so presumably are not direct benefits of the Project. The Applicant should clarify the relationship between the funded projects and the LTC application Project, as it is understood that Designated Funds are standalone funds independent of highway delivery. Chapter 6 of Document 7.20 - Benefits and Outcomes <a href="#">[APP-553]</a> adds that the remaining funds from the £30 million have to be spent by 31 March 2025 which is not yet allocated. Can the Applicant explain if that funding is committed regardless of the decision on the Project or if it only contingent on the Project</p>



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		<p>being approved and construction commencing. The ExA needs to be clear if these funds are a benefit of the Project or not. Furthermore, can the Applicant clarify whether there is likely to be an extension to the spend date, because if the remaining funding pot is contingent on the Project being approved (and/or starting construction) then that date does not allow much time for LTC legacy projects to be developed and realised.</p> <p><b>Response:</b></p> <p>The reference in Section 2.9 in ES Chapter 2 [APP-140] to legacy projects relates to the Benefits and Outcomes Document and the allocation of the Designated Funds which are detailed in Section 5.3 of that document [APP-553]. Hole Farm is referenced as an example of an environment based project and is facilitating the provision of visitor infrastructure to support the delivery of early mitigation for the Project and provides a legacy in the form of an extension to the Thames Chase Community Forest.</p> <p><b>Relationship between the funded projects and the LTC application Project, as it is understood that Designated Funds are standalone funds independent of highway delivery.</b></p> <p>This is correct – the Applicant’s designated funds are separate to its core work of operating, maintaining and improving England’s strategic road network. The Designated Fund for the Project area of £30m including the committed funding allocated to projects of £5m provides ring-fenced funding that is used to invest in and support initiatives that deliver lasting benefits for road users, the environment and communities across England. Additional detail regarding Designated Funds can be found in Section 4.2 of the Benefits and Outcomes Document [APP-553].</p> <p><b>£30 million have to be spent by 31 March 2025 which is not yet allocated. Can the Applicant explain if that funding is committed regardless of the decision on the Project or if it only contingent on the Project being approved and construction commencing.</b></p> <p>The Designated Fund is independent of the Project and is not reliant on the Project. Paragraph 4.2.2 of the Benefits and Outcomes Document [APP-553] states:</p> <p><i>‘These funds sit outside the Lower Thames Crossing Project and are not considered benefits as part of the planning balance. They form part of National Highways’ ‘business as usual’ and are not directly linked to the DCO application.’</i></p> <p>Since November 2022 the Applicant has approved a further £2.7m of Designated Fund funding for Schemes in the Project area. The current position is that £13.1m of proposals have been submitted and are going through the Designated Fund approvals process and a forward programme of</p>

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		<p>proposals (£9.2m) are being developed into submissions for approval by end of October 2023 taking up the remaining £30m commitment. The Applicant is confident these will be deliverable by end of March 2025. There is also a reserve list of a further circa £30m of schemes, which can be drawn into the programme if for any reason a scheme is not approved, is no longer needed or the Applicant predicts an underspend against the £30m commitment.</p> <p>The Department for Transport provides the investment for designated funds as part of government's Road Investment Strategy 2: 2020 to 2025 (RIS2)<sup>2</sup>.</p> <p>RIS2 commits the government to spend a total of £27.4 billion during the second Road Period, which runs from 2020 to 2025. Some of this will be used to build new road capacity, but much more will be focused on improving the current strategic road network and its surroundings, so that every part of the country will benefit. The Applicant's designated funds – ring-fenced funding streams totalling £936m – come from the RIS2 investment period and play a vital role in providing wider benefits in the Project area outside the constraints of the DCO project.</p> <p><b>Can the Applicant clarify whether there is likely to be an extension to the spend date, because if the remaining funding pot is contingent on the Project being approved (and/or starting construction) then that date does not allow much time for LTC legacy projects to be developed and realised.</b></p> <p>The Designated Fund is not contingent of the approval of the A122 Lower Thames Crossing DCO and therefore the fund is accessible now and this funding is linked to the government's RIS2 and potentially for the RIS 3 period 2025–2030. The designated funds process therefore means it does not affect the time for legacy projects to be developed and realised. Hole Farm delivery is an example of this. There is to be no extension to the spend date for the current RIS2 designated fund.</p>
ExQ1_Q13.1.7	N/A	<p><b>Loss of Service Station</b></p> <p>It is understood that the ESSO Cobham Service Station is well used and that there are no plans for a direct replacement of this type of facility as part of the Project. The Applicant suggests that it is taking active steps to improve provision of roadside facilities, including making progress to explore the possibility of a new lorry park at Chigwell, and encouraging further service provision as a key element of the forthcoming Route Strategies in the region. Can The Applicant provide an update on this? Can</p>

<sup>2</sup> Department for Transport (2020). Road Investment Strategy 2: 2020–2025.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/951100/road-investment-strategy-2-2020-2025.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951100/road-investment-strategy-2-2020-2025.pdf)

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		<p>the Applicant also confirm that such proposals would require a planning application separate to the Project DCO and so cannot be guaranteed to come forward?</p> <p><b>Response:</b></p> <p>The Applicant acknowledges that the Esso Cobham Service Station is utilised but its removal is unavoidable due to the shortage of land available and the overall benefits provided by the route selected. The Applicant does not establish or operate service stations, and this is a matter for the roadside service facility operators, but notes that Tollgate Services, within 1 mile, has been expanded in recent years.</p> <p>As an update within the vicinity of the Lower Thames Crossing:</p> <ul style="list-style-type: none"> <li>• The National Highways Roadside Facility Working Group continues to be active in communicating with stakeholders such as roadside service facility operators and local planning authorities, to encourage interest in establishing new facilities in areas where there is a shortage and inform the local plan process.</li> <li>• There is currently an application for a lorry park on the strategic road network (SRN) from a roadside service facility operator which is currently being considered by the Tonbridge and Malling planning authority.</li> <li>• National Highways is investing in improving roadside facilities on the SRN, including providing £20 million for extra Heavy Goods Vehicle (HGV) driver facilities and providing extra capacity for rapid charging at Maidstone, Clacket Lane East and Clacket Lane West.</li> <li>• The Department for Transport (DfT) and National Highways are still exploring the possibility of a site on the M11 near Chigwell becoming a lorry park.</li> <li>• The DfT Circular 01/22<sup>3</sup> requires that local planning authorities (where applicable) have regard to the shortage of HGV parking on or near the SRN (when producing and adhering to their local plans).</li> </ul>

<sup>3</sup> Department for Transport (2022). Strategic road network and the delivery of sustainable development. Accessed August 2023.  
<https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development>.

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		<ul style="list-style-type: none"> <li>• The National Highways Route Strategy Initial Overview Reports were published in May 2023<sup>4</sup> as part of the continuing investigation of strategy for roadside and other facilities. There are three reports which detail the SRN in the vicinity of the Lower Thames Crossing:                             <ul style="list-style-type: none"> <li>– London Orbital and M23<sup>5</sup></li> <li>– East of England<sup>6</sup></li> <li>– Kent Corridors to M25<sup>7</sup></li> </ul> </li> </ul> <p>In response to the last part of the question, the Applicant confirms that such proposals would require a planning application separate from the Project DCO and so cannot be guaranteed to come forward.</p>
ExQ1_Q13.1.8	N/A	<p><b>New Car Park Area to the west of Thong Lane</b></p> <p>A new car park area with provision for a kiosk, toilets, changing facilities and an area for cycle hire to the west of Thong Lane has been identified as a possible environmental enhancement opportunity to provide recreational access to the Public Right of Way network. It is noted that Work No. 1P in Schedule 1, Part 1 of the dDCO relates to the construction of a new car park next to the realignment of Thong Lane but this does not commit the applicant to the other suggested features. Can the Applicant confirm that the kiosk, toilets and changing facilities would require a planning application separate to the Project DCO and so cannot be guaranteed to come forward? Have any designated funds or s106 funds been earmarked for these facilities?</p> <p><b>Response:</b></p> <p>The Applicant can confirm that a separate planning application from a third party will be required for the kiosk, toilets and changing facilities at the new car park area to the west of Thong Lane and so cannot be guaranteed to come forward. However, the facilities are not relied upon to mitigate impacts</p>

<sup>4</sup> National Highways (2023). Route Strategy Initial Overview Reports. Accessed August 2023. <https://routestrategies.nationalhighways.co.uk/>

<sup>5</sup> National Highways (2023). Route Strategy Initial Overview Report: London Orbital and M23. Accessed August 2023.

[https://nationalhighways.co.uk/media/zoqp53rx/r16-london-orbital-and-m23\\_acc.pdf](https://nationalhighways.co.uk/media/zoqp53rx/r16-london-orbital-and-m23_acc.pdf)

<sup>6</sup> National Highways (2023). Route Strategy Initial Overview Report: East of England. Accessed August 2023.

[https://nationalhighways.co.uk/media/aofgdtcp/r12-east-of-england\\_acc.pdf](https://nationalhighways.co.uk/media/aofgdtcp/r12-east-of-england_acc.pdf)

<sup>7</sup> National Highways (2023). Route Strategy Initial Overview Report: Kent Corridors to M25. Accessed August 2023.

[https://nationalhighways.co.uk/media/jbgh5ham/r14-kent-corridors-to-m25\\_acc.pdf](https://nationalhighways.co.uk/media/jbgh5ham/r14-kent-corridors-to-m25_acc.pdf)

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		<p>as a result of the Project, and so are only an enhancement opportunity. Accordingly, no funding has yet been earmarked to provide the facilities.</p> <p>The car park itself would serve to support access to recreational areas and likely reduce the risk of on-road parking in this area. The facilities were identified by Kent County Council as being required should they or another operator wish to take on the management of the car park and ensure that it would be commercially viable.</p> <p>Work No. 1P in Schedule 1, Part 1 of the draft Development Consent Order (DCO) <a href="#">[REP3-077]</a> provides for the construction of a new car park next to the realignment of Thong Lane as follows:</p> <p><i>'Work No. 1P – as shown on sheet 4 of the works plans and being the construction of a new car park next to the realignment Thong Lane over the improved section of the A2 mainline (Work No. 1H).'</i></p> <p>The intention is for part of the construction compound in this location (Work No. CA2) to be repurposed as a car park which may be attractive to visitors and to users of walking, cycling and horse riding routes and recreational areas in and around Shorne Woods Country Park and the facilities within Shorne Woods Country Park itself, noting that the existing Shorne Woods Country Park car park would remain the primary access location/focal point for vehicle-based visitors to Shorne Woods Country Park.</p> <p>The DCO provides for the appropriate space and utility connections that would support the subsequent application for the facilities outlined above, rather than providing the facilities.</p>
ExQ1_Q13.1.9	N/A	<p><b>Visual Bulk and Overshadowing</b></p> <p>Neither ES Chapter 13 – Population and Human Health [APP-151] nor the Planning Statement [APP-495] have addressed visual bulk or overshadowing impacts on individual properties as a result of the scale and proximity of new structures and embankments in close proximity to residential properties. For example, some of the properties at Woolings Close, Orsett will have an embankment immediately adjacent and a road above them. A visual bulk and daylight and sunlight assessment on residential properties (which includes care homes) is seemingly absent. The Applicant is requested to review the proposal to identify which residential properties may be affected by tall structures and embankments in close proximity to habitable room windows and to appraise the impacts. This appraisal shall be submitted at Deadline 5 at the latest.</p>

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		<p><b>Response:</b></p> <p>A Daylight and Sunlight analysis is more usually required in urban areas, where tall buildings are proposed in close proximity to existing dwellings. Because the Lower Thames Crossing Project passes through rural areas and because of the relatively low scale of proposed structures and embankments near residential properties, the Applicant did not consider this analysis to be necessary. In addition, the need for a Daylight and Sunlight Analysis was not identified in the Inspectorate's Scoping Opinion, set out in ES Appendix 4.1: The Inspectorate's Scoping Opinion and National Highways Response <a href="#">[APP-340]</a>. However, in response to this question a preliminary review of residential receptors likely to be notably affected by changes to daylight and sunlight has been undertaken and the Applicant believes that very few, if any, properties would meet the criteria for analysis set out in the Building Research Establishment (BRE) <i>Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice</i><sup>8</sup>.</p> <p>The Applicant will establish whether a Daylight and Sunlight Analysis is required under the relevant guidance, <i>Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice</i>, to determine if any residential properties in close proximity to proposed structures and tall embankments meet the criteria for this type of assessment and will report back to the ExA at Deadline 5.</p> <p>The visual bulk of the Project has been assessed in terms of the effects on visual amenity, including the effects on residential receptors, in ES Appendix 7.10 Schedule of Visual Effects <a href="#">[APP-385]</a>.</p>
ExQ1_Q13.1.11	N/A	<p><b>Healthcare Services</b></p> <p>The Register of Environmental Actions and Commitments No. PH002 (contained in ES Appendix 2.2 – Code of Construction Practice, First Iteration of Environmental Management Plan) [REP1-157] states that “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 (ICPs).” The term ‘appropriate range’ is vague. Can the Applicant</p>

<sup>8</sup> Paul Littlefair, Stephanie King, Gareth Howlett, Cosmin Ticleanu & Adam Longfield for Building Research Establishment (08 June 2022). *Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*, BR209, 2022 edition.

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		<p>explain what dedicated healthcare services have been agreed with the ICPs (if any) and how such services will be secured?</p> <p><b>Response:</b></p> <p>Commitment PH002 contained in ES Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan [REP3-104] was developed following discussion with stakeholders (notably local authorities and other attendees of the Community Impacts and Public Health Advisory Group (CIPHAG)) in relation to the impact of the construction workforce on demand and access to healthcare. The word "appropriate" is used as the needs of different elements of the Project in this regard will be different. It is not therefore appropriate to establish a numerical limit, or threshold. Instead the engagement established under the commitment. The measure was developed with the intention of ensuring that impacts on local healthcare services would be minimised, as this was a specific area of concern raised by stakeholders. At the time of submission, the specific nature and breadth of services potentially required was not known; the wording of the commitment was first introduced at the CIPHAG meeting held in August 2022, as documented in Table 5.2 of the Health and Equalities Impact Assessment (HEqIA) [REP3-118]. Stakeholders were broadly satisfied with the measure, given that it included a requirement for onsite facilities for both medical and occupational services, and covered both physical and mental health needs. For example, a meeting was held on 25 August 2022 with the Dartford, Gravesham and Swanley Integrated Care Partnership (ICP) (referred to in Table 5.3 of the HEqIA [REP3-118]) which discussed commitment PH002 as worded. Minutes of the August 2022 CIPHAG meeting record this and note that <i>'following the DCO submission more work will be done and the topic discussed further'</i>.</p> <p>No dedicated healthcare services have been agreed with ICPs to date; however, the Applicant is continuing to discuss the appropriateness of the health services committed in PH002, including how this will be secured, with stakeholders:</p> <ul style="list-style-type: none"> <li>• A Statement of Common Ground is being developed with NHS North East London Integrated Care Board (ICB) [REP1-214]. Meetings have been held in June and July 2023. The impact of a large construction workforce and their families on local health services and on available capacity remains a Matter Under Discussion with the ICB, and the Applicant has committed to continued engagement with the ICB to determine the nature of services required.</li> <li>• Meetings have held been held with NHS Kent and Medway Board since submission of the DCO and the commitment was discussed with them at a high level. A meeting was held with NHS Kent</li> </ul>



PINS ID	External Stakeholder (where applicable)	Question / Response
		<p>and Medway Board on 22 August 2023 where it was agreed the ICB should be involved, and the Applicant has committed to continued engagement.</p> <ul style="list-style-type: none"> <li>Engagement with other organisations, for example the Mid-South Essex ICB is continuing, and will include discussion relating to commitment PH002 and further definition of appropriate healthcare services.</li> </ul> <p>Engagement has also started with Delivery Partners in relation to the provision of healthcare services for their workforce, building on their understanding and experiences of the types of services likely to be most appropriate for their workers and how these should be designed and managed to ensure maximum use.</p> <p>Of further note is that discussions have taken place with Thurrock Council since submission of the DCO regarding concerns around the word 'appropriate' in commitment PH002, with enquiries about the process in case the integrated care partnerships (and its constituents) cannot agree the scope of these services post consent. The Applicant has clarified that all the relevant stakeholders would be consulted when the range of medical and occupational healthcare services are being planned, as committed to in PH002.</p>
ExQ1_Q13.1.12	N/A	<p><b>Whitecroft Care Home 1</b></p> <p>Paragraph 13.6.75 of ES Chapter 13 – Population and Human Health [APP-151] assesses the likely significant effects on Whitecroft Care Home. It identifies that the care home is of high sensitivity but concludes that the impacts are minor adverse due only to a discernible change in access during the construction period, which is not significant. Can the Applicant advise of the specific air quality and noise impacts on Whitecroft Care Home residents during construction and operation of the Project and whether any specific mitigation is required given the high sensitivity of the residents?</p> <p><b>Response:</b></p> <p>Paragraph 13.6.75 of Environmental Statement (ES) Chapter 13: Population and Human Health [APP-151] confirms that part of Whitecroft Care Home is located within the Order Limits with the care home building within 300m of the Stanford Road compound (Works No. CA7). It is confirmed that the care home building would not be affected by the permanent or temporary use of land for construction of the Project, although a small area of land owned by the care home would be required permanently for the works to connect the existing driveway to the realigned Stanford Road.</p>



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		<p>Access to the care home would be maintained at all times during the construction phase. Mitigation measures identified in relation to construction traffic management and community engagement are set out in ES Appendix 2.2: Code of Construction Practice (CoCP) [REP3-104].</p> <p>Paragraph 13.6.75 of ES Chapter 13 Population and Human Health [APP-151] confirms that Whitecroft Care Home is identified as being of high sensitivity. However, 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.</p> <p>The assessment and consideration of noise is presented in ES Chapter 12: Noise and Vibration [APP-150], concluding the following.</p> <ul style="list-style-type: none"> <li>• Operational Impacts: Minor Beneficial Impacts below a Significant Observed Adverse Effect Level in accordance with Design Manual for Roads and Bridges LA 111 Noise and vibration<sup>9</sup>. As such, during the operational phase the contribution of road traffic noise at the site reduces due to screening of the Project, the existing A13 and the proposed A13/A1089/A122 junction, earthworks to the west of the care home and the provision of low-noise surfacing along the Project, A13 and Stanford Road.</li> <li>• Construction Impacts: Whitecroft Care Home is noted as a sensitive receptor (CN 85) within Table 12.33 of ES Chapter 12: Noise and Vibration [APP-150]. In the absence of any mitigation, a moderate or greater impact is predicted during the daytime and night-time periods. However with the implementation of Best Practicable Means (BPM) measures set out in the application and secured under REAC commitment NV007 of ES Appendix 2.2: CoCP [REP3-104], construction noise impacts are concluded to not constitute a significant effect.</li> <li>• No further mitigation is proposed above that contained within ES Chapter 12: Noise and Vibration [APP-150] relating to: <ul style="list-style-type: none"> <li>– Provision of Low Noise Surfacing as detailed within ES Figure 12.6: Operational Road Traffic Noise Mitigation [APP-314], secured by Register of Environmental Actions and Commitments (REAC) commitment NV013 within ES Appendix 2.2: CoCP [REP3-104].</li> </ul> </li> </ul>

<sup>9</sup> Highways England (2020). Design Manual for Roads and Bridges LA 111 Noise and vibration.  
<https://www.standardsforhighways.co.uk/tses/attachments/cc8cfcf7-c235-4052-8d32-d5398796b364?inline=true>

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		<p>– Provision of extensive earthworks measures as detailed on ES Figure 12.6: Operational Road Traffic Noise Mitigation [APP-314].</p> <p>Since submission of the application further consideration of the BPM measures that can be implemented at the care home has been undertaken. Detailed three-dimensional acoustic modelling of the care home facility is being undertaken within proprietary acoustic modelling software that considers each façade of the care home and specifics of the external amenity spaces, derived from information supplied by Runwood Homes and a site visit undertaken by the Applicant on 13 June 2023. The Applicant is currently engaging with the Care Home regarding what those BPM measures may be and how they would be implemented.</p> <p>As these measures would be considered to fall under BPM, secured under REAC commitment NV007, and considered through the works necessary under REAC commitments NV004 (section 61 consents) and NV006 (Noise and vibration assessment), these measures will be developed and implemented through mechanisms already committed in ES Chapter 12: Noise and Vibration [APP-150] and secured through commitments in ES Appendix 2.2: CoCP [REP3-104].</p> <p>The air quality assessment is presented within ES Chapter 5: Air Quality [APP-143] and has included Whitecroft Care Home as a sensitive receptor (LTC262) in the modelling assessment. The Project is not expected to lead to significant air quality effects for human health and compliance with Limit Values, and so does not require mitigation for these effects. The air quality results show that there are no exceedances of Air Quality Strategy objectives for nitrogen dioxide (NO<sub>2</sub>), particulate matter where particles are less than 10 micrometres in diameter (PM<sub>10</sub>) and less than 2.5 micrometres in diameter (PM<sub>2.5</sub>), predicted at Whitecroft Care Home in the construction and operational phase (with and without the Project). Dust and emission management measures will be in place during construction as set out within the REAC, which forms part of the CoCP [REP3-104].</p> <p>The Health and Equalities Impact Assessment (HEqIA) [REP3-118] considers health outcomes relating to various areas of environmental change, including air quality and noise, in relation to vulnerable groups such as older people and people with disabilities. These are also protected characteristics for which differential and disproportionate impacts have been identified and who it is understood may be more susceptible to increases in noise levels. The HEqIA notes that a range of mitigation measures would be in place during construction to reduce impacts associated with construction noise. Sensitive receptors such as the Whitecroft Care Home have formed part of discussions with stakeholders, including at the March 2022 meeting of the Community Impacts and</p>

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		Public Health Advisory Group (CIPHAG) on which local authorities such as Thurrock Council are represented. Engagement with the Care Home directly has included involvement of the Population and Human Health specialist, with a view to understanding issues directly and informing assessments.
ExQ1_Q13.1.14	N/A	<p><b>Treetops and Beacon Hill Schools</b></p> <p>Treetops and Beacon Hill Schools are both establishments for children with Special Educational Needs and Disabilities, which Paragraph 13.6.75 of ES Chapter 13 – Population and Human Health [APP-151] notes have an intake of children and young people with a variety of sensory and other issues. The Applicant notes that those schools have concerns over air quality and noise but does not specifically address the issues. Can the Applicant advise of the specific air quality and noise impacts on the aforementioned schools during construction and operation of the Project and whether any mitigation is required given the high sensitivity of the users?</p> <p><b>Response:</b></p> <p>Paragraph 13.6.75 of ES Chapter 13: Population and Human Health [APP-151] identifies Treetops and Beacon Hill schools as education establishments located next to the A1089 and A1013 at Grays, Thurrock, both of which are within approximately 10m of the Order Limits for the Project. The schools are identified as establishments for children with Special Educational Needs and Disabilities (SEND), with the intake including children and young people with a variety of sensory and other issues. Engagement with the schools has highlighted they have concerns over potential air quality, noise and access impacts during the construction phase.</p> <p>Paragraph 5.6.126 of Environmental Statement (ES) Chapter 5: Air Quality [APP-143] concludes that impacts during the construction phase will not lead to a significant effect on local air quality at sensitive human health receptors. Receptor LTC121 is located immediately east of Treetops and Beacon Hill schools, between the schools and the A1089, so the Applicant considers this sensitive receptor to be representative of Treetops and Beacon Hill schools. There is an imperceptible change (0.4µg/m<sup>3</sup> or less) predicted for annual mean nitrogen dioxide (NO<sub>2</sub>) and particulate matter where particles are less than 10 micrometres in diameter (PM<sub>10</sub>) at this sensitive receptor in all construction years, as a result of road traffic changes associated with the construction of the Project. Furthermore, the annual mean NO<sub>2</sub> and PM<sub>10</sub> concentrations predicted at this sensitive receptor are well below Air Quality Strategy (AQS) objectives for NO<sub>2</sub> and PM<sub>10</sub> in all construction years. Construction dust effects are not considered to be significant following the adoption of the good practice measures</p>

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		<p>(commitments AQ002 to AQ005) outlined in the Register of Environmental Actions and Commitments (REAC) <a href="#">[REP3-104]</a>. During construction of the Project, air quality will be monitored where required to make sure significant construction dust effects do not occur. The monitoring locations will be approved by the Secretary of State (SoS) in consultation with the relevant local authorities (commitment AQ006).</p> <p>Paragraph 5.6.137 of ES Chapter 5: Air Quality <a href="#">[APP-143]</a> concludes that impacts during the operational phase will not lead to a significant effect on local air quality at human health receptors, and no mitigation is therefore required in regards to these effects. During operation the changes in NO<sub>2</sub> and PM<sub>10</sub> are predicted to be imperceptible at receptor LTC121 and annual mean pollutant concentrations are expected to be well below AQS objectives.</p> <p>Treetops School and Beacon Hill Academy are both noted as sensitive receptors in ES Chapter 12: Noise and Vibration <a href="#">[APP-150]</a>.</p> <p>Within the assessment presented in ES Chapter 12: Noise and Vibration <a href="#">[APP-150]</a>, construction noise impacts have been assessed at Treetops School noted as receptor CN 74. This receptor is closer to the construction works than Beacon Hill and the Applicant considers this location to also be representative of Beacon Hill, which is located approximately 70m to the west of Treetops School.</p> <p>As presented within Table 12.33 of ES Chapter 12: Noise and Vibration <a href="#">[APP-150]</a>, at receptor CN 74, construction noise impacts are concluded to not constitute a significant effect, with impacts in the absence of any mitigation predicted to only exceed construction noise thresholds during the night-time (23:00 to 07:00) when neither school would be a sensitive receptor.</p> <p>Noise and vibration from construction activities associated with the Project would be controlled in a proactive manner through the implementation of a Noise and Vibration Management Plan prepared against the terms of REAC commitment NV-002, including liaison with the local residents, local planning authorities and other stakeholders. In addition, there will be monitoring and policing of construction noise and vibration impacts through commitments made in ES Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan <a href="#">[REP3-104]</a>.</p> <p>REAC commitments NV007 (Best Practicable Means), NV008 (Community Engagement), NV009 (noise and vibration monitoring) and NV015 (actions in case of noise monitoring exceedance) will allow inclusion of additional mitigation requirements relating to construction noise and vibration and ensure engagement with the local planning authorities in this regard.</p>

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		<p>Furthermore, during the construction phase, ES Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan [REP3-104] requires a Noise and Vibration Management Plan to be produced under commitment NV002, along with Control of Pollution Act 1974 Section 61 applications and/or updated construction noise assessments to be undertaken under REAC commitments NV004 (Section 61 consents) and NV006 (noise and vibration assessment). These would identify any such mitigation measures in advance, policed and controlled through the REAC commitments listed in the paragraph above.</p> <p>Operational road traffic noise levels are predicted to be minor beneficial at both Treetops School and Beacon Hill Academy, due to the implementation of a low noise surface on the A1089 north of the schools and other parts of the LTC SRN scheme, and as such no mitigation measures during operation would be necessary. Whilst beneficial, these impacts would occur below a Significant Observed Adverse Effect Level (SOAEL) and would not constitute a significant beneficial effect.</p> <p>The schools have been assessed within ES Chapter 13: Population and Human Health [APP-151] as being of very high sensitivity due to the specialist services they provide.</p> <p>The Health and Equalities Impact Assessment (HEqIA) [REP3-118] considers health outcomes relating to various areas of environmental change, including air quality and noise, in relation to vulnerable groups such as children and people with disabilities. These are also protected characteristics for which differential and disproportionate impacts have been identified and who may be more susceptible to increases in noise levels. The HEqIA notes that a range of mitigation measures would be in place during construction to reduce impacts associated with construction noise.</p> <p>The Applicant considers adequate mitigation is provided during the construction and operational phases based on the assessments undertaken and measures proposed as set out above.</p>
ExQ1_Q13.1.15	N/A	<p><b>Work and Training</b></p> <p>Table 7.39 of Document 7.10 – Health and Equalities Impact Assessment [APP-539] states that “The number of people that would experience beneficial changes as a result of the creation of new employment and training opportunities is high – supporting more than 22,000 jobs in the areas to the south and north of the River Thames, with 45% of employees to be from within 20 miles of the Project route, including within the host local authorities of Gravesham, Medway, Dartford, Thurrock, Havering and Brentwood. Creating a skills legacy is one of the ambitions for the Project as set out in the Skills, Education and Employment (SEE) Strategy.” This commitment is also identified in Document 7.20 -</p>

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		<p>Benefits and Outcomes [APP-553] at Paragraph 3.3.5, and in Section 7.2 of Document 7.3 – Section 106 Agreements [APP-505]. The SEE Strategy is supposed to be provided at Appendix B of Document 7.3 but it is blank. Can the Applicant please advise why Appendix B is noted as ‘intentionally left blank’? It is appreciated that Document 7.3 is a Heads of Terms document and detail is therefore to still be worked out with relevant stakeholders but it is difficult for the ExA and other stakeholders to determine how the measures will be realised. In addition, Thurrock Council have asked for the SEE Strategy to be included within the dDCO submission as a ‘Control Document’ to ensure its provisions and targets are adequately secured and followed by the contractors. Can the Applicant comment on this request? Finally, can the Applicant comment on Thurrock Council’s concern that the SEE Strategy does not seek to source more labour from Thurrock given that some 70% of the route falls within its area?</p> <p><b>Response:</b></p> <p>The Skills, Education and Employment (SEE) Strategy is included at Annex B to the Section 106 Agreements – Heads of Terms [APP-505] from Page 20. Page 19 states ‘This page is intentionally left blank’ as this is a title page with different formatting to the SEE Strategy.</p> <p>The Applicant acknowledges that the Section 106 Agreements – Heads of Terms [APP-505] is a high-level document that sets out the intention to develop detailed governance, monitoring and implementation measures related to achieving the minimum targets that will be secured by the Section 106 Agreements. Paragraph 7.1.2 of Section 106 Agreements – Heads of Terms [APP-505] sets out that ‘<i>National Highways will continue to develop the details of these obligations in consultation with the local authorities</i>’.</p> <p>This engagement is progressing with each relevant local authority and groups such as the South East Local Enterprise Partnership (SELEP). The Applicant is an active member of SELEP’s Major Projects Group and Major Projects Skills Group. These groups facilitate dialogue between Major Projects across the region to identify and address conflicting material and labour demands and potential skills shortages on an ongoing basis.</p> <p>The Applicant does not consider it necessary or appropriate to secure the SEE Strategy as a Control Document. The Section 106 Agreement (or Unilateral Agreement, should the Agreement not be reached at the end of the Examination Period) will commit the Applicant (and the commitment will flow to Contractors) to make best endeavours to reach overall minimum targets set out in Table 7.1 of the Section 106 Agreements – Heads of Terms [APP-505], as well as requiring Contractors to</p>



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		<p>produce annual Employment and Skills Plans (paragraph 7.2.4) and provide monitoring (paragraph 7.2.5) which is detailed in the SEE Strategy.</p> <p>It is important, therefore, to retain flexibility for the Contractor, Applicant and local skills providers/infrastructure to revise plans and approaches related to each individual contract package, and in light of any changes to the throughput of work-ready and job-ready local residents, and to work with the curriculum and opportunities in the local area in a responsive way. By securing targets, monitoring and annual plans through the Section 106 Agreement, and enabling flexibility to respond through the SEE Strategy, rather than adopting the document as a Control Document, an appropriate balance of security and flexibility will be provided.</p> <p>As a significant proportion of the route falls within Thurrock, it would follow that Thurrock residents would proportionately benefit from the proposed local workforce targets. While the targets reflect the Project's ambition to support local jobs throughout construction, they do not form a cap on local recruitment and there is nothing to prevent these targets being exceeded in Thurrock should companies employing people from local communities be successful in winning work across the Project supply chain.</p>
ExQ1_Q13.1.16	N/A	<p><b>Work and Training</b></p> <p>Several Local Authorities have raised concerns about how a large workforce would be sourced when other large projects would be built in the area at the same time (e.g. Tilbury2). Whilst the Applicant has expressed its aspiration to recruit locally, it remains that a substantial amount of the workforce required would be expert personnel. How realistic is it that 45% of the employees will be 'local'? Can the Applicant advise whether it has proposed similar commensurate measures for other already constructed NSIP highways projects, such as the A14, and if so were the job targets realistic? How successful was the measure? The Applicant may wish to combine the answer with Q13.1.15.</p> <p><b>Response:</b></p> <p>The Project's peak construction phase ('Phase 6') is estimated at 4,687 workers (monthly peak) (Table 5.2 of the Framework Construction Travel Plan <a href="#">[APP-546]</a>), including civils construction, tunnelling, hyperbaric and non-construction roles. For the majority of the construction period, the total workforce required will be much lower (see Plate 5.4 of the Workers Accommodation Report <a href="#">[APP-551]</a> which sets out that the overall peak phase is 'Phase 6' (5 months at 4,515 workers)).</p>

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		<p>The Section 106 Agreements – Heads of Terms [APP-505] (which includes the Applicant's Skills, Employment and Education (SEE) Strategy at Appendix B) explains (paragraph 7.2.3) that the Applicant expects to achieve a target of at least 20% of employees to be local people who usually reside within Gravesham, Medway, Thurrock, Havering and Brentwood immediately prior to obtaining work on the Project, and continue to do so on starting work on the Project; and 45% of the workforce from within a 20-mile area.</p> <p>The 45% local employment target would equate to 2,109 people if applied to the peak. However it is noted that different stages of the Project's construction will be more/less likely to source employment locally, based on the skill set required. Data from the 2021 Census<sup>10</sup> on resident construction employment identifies that this means the Project would seek to employ around 1.3% of the existing construction workforce (165,000 people) in that area (local authorities wholly within 20 miles), which is considered both ambitious and realistic based on the measures set out within the SEE Strategy.</p> <p>There is also a substantial opportunity to help people develop pre-employment skills to re-enter the workforce. In this area, there are currently 62,500 people who are unemployed and an additional 55,000 who are economically inactive but want to work (Annual Population Survey<sup>11</sup>) and the Project is actively supporting the potential for these people to work on the Project (and in the wider construction sector) as set out below.</p> <p>The A14 project did not collect data to assess the geographical spread of its workforce. The ambition for a local workforce on the Lower Thames Crossing is designed to encourage a local supply chain that maximises the Project's contribution to the local economy, and supports local people to develop the skills needed to support future investment in the region.</p> <p>Assessment of how achievable the Project's local employment ambition is, has been based on the amount of construction labour available, the types of initiatives set out within the SEE Strategy, and through long-term engagement with local authorities and Local Enterprise Partnerships, as well as engagement with local business through a programme of supply chain engagement. Through supply chain engagement, over 1,000 businesses have registered their interest to work on the Project. On this basis, the Applicant believes the local workforce target to be achievable.</p>

<sup>10</sup> Office for National Statistics (2022). Census Table TS060. Accessed September 2023. [nomisweb.co.uk](https://nomisweb.co.uk)

<sup>11</sup> Office for National Statistics (2022). Annual Population Survey. Accessed September 2023. [nomisweb.co.uk](https://nomisweb.co.uk)



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		<p>To help realise this ambition, the Project's Contractors will work with local authorities and skills providers throughout the construction period to address skills shortages by partnering with local services that target local communities. Jobs within the supply chain will be shared so that they can be advertised on local authority job sites and brokerages, and local careers fairs and similar events will be attended. Recruitment processes will be inclusive and accessible to encourage diversity in the workforce, and interviews will be guaranteed to local people from priority groups agreed through the Employment and Skills Working Group and subsequently named in the SEE Strategy.</p> <p>The Project will build on lessons learned from the A14 (which delivered pre-employment support through the charity Groundworks) to provide a pre-employment skills and support programme that will provide local unemployed people with employability skills through careers advice and mock interviews, skills and training and work experience. This will support the target for 500 local unemployed people to be brought back to work through the Project.</p> <p>These actions are included in the Applicant's SEE Strategy at Appendix B of the Section 106 Agreements – Heads of Terms <a href="#">[APP-505]</a>.</p>
ExQ1_Q13.1.17	N/A	<p><b>Workforce Accommodation</b></p> <p>Notwithstanding the aspiration that 45% of the workforce would be local (within 20 miles of the Project route), the Workers Accommodation Report (Doc 7.18, <a href="#">[APP-551]</a>) explains that most staff seeking temporary accommodation would use the private rented sector (PRS) with an estimated 305 workers requiring PRS accommodation at the peak in the south, and an estimated 1,055 workers requiring PRS accommodation at the peak in the north. It is concluded that there is sufficient capacity in the local accommodation market (within a 60 minute commute) for temporary workers. The ExA is concerned that reliance on 2011 Census data to determine the number of PRS homes and bedrooms in the catchment area may be outdated as there have been common press reports of a significant decline in numbers of homes available for rent nationally and a significant increase in the proportion of households renting. The impact of the workforce on rent values and availability of rented properties for local residents therefore requires a more up to date picture. The Applicant is asked to provide an updated Accommodation Assessment (Section 6 of the Workers Accommodation Report (Doc 7.18, <a href="#">[APP-551]</a>)) using 2021 census data where available? A 2019 report produced by Oxford Brookes University for The New Nuclear Local Authorities Group (NNLAG) on the impacts of the early stages of construction of the Hinkley Point C (HPC) Nuclear Power Station identified that the accommodation strategy for that NSIP DCO considerably underestimated the impact on the PRS and that monitoring</p>

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		<p>and mitigation of the impact was not robust. It is noted that the Applicant intends to monitor workforce accommodation options/availability but can the Applicant advise if and how it intends to monitor and mitigate the impacts of the workforce on the local housing market across the construction period and specifically the impact on housing availability to local vulnerable groups if its tested scenarios prove to be wrong?</p> <p><b>Response:</b></p> <p><u>With regard to the ExA's reference to 'most staff seeking temporary accommodation would use the private rented sector'</u></p> <p>The Applicant would note that the Workers Accommodation Report (WAR) [APP-551] noted that there was a balance of accommodation types that would be used by Project workers, with just over half of workers at 53% in PRS, with the rest made up of visitor accommodation, owner-occupied and latent accommodation.</p> <p>As set out within the WAR [APP-551] from paragraph 1.1.17, there are at least one million PRS bedrooms within 60 minutes from the main construction compounds, and '<i>demand from the Project for PRS is unlikely to be substantial at the macro-scale – with demand equating to a fraction of 1% of supply for each of the north and south areas, and less than 3% of the 'frictional vacancy' at that scale</i>'.</p> <p><u>With regard to the ExA's reference to the use of 2011 Census data, 'common press reports of a significant decline in numbers of homes available for rent nationally and a significant increase in the proportion of households renting' and request for an 'updated Accommodation Assessment (Section 6 of the Workers Accommodation Report (Doc 7.18, [APP-551])) using 2021 census data where available'</u></p> <p>2021 Census data on tenure was not available at the time of submission of the DCO application (it was released in January 2023). Data on tenure is now available and has been used to update parts of the WAR (as set out in this response) where possible. It should be noted, however, that a full update is not possible – while data on tenure is available, data on turnover within the market (i.e. the number of households moving in a year in the private rented sector) is not yet available. Although ten years old, the 2011 Census provided the best level of granularity and confidence of data for the total supply of private rented accommodation, and the level of turnover of rented accommodation (in 2011). This is because it includes data on every household, at all spatial scales, whereas alternative datasets are</p>

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		<p>sample-survey-based and lack local granularity. The Census (2011 or 2021) does not provide information about the availability of PRS accommodation or rental prices.</p> <p>The WAR recognised that the Census, while robust, is ten years old, and therefore used other more recent (but less granular) datasets to estimate the current position. The Applicant set out that this was a limitation, and used secondary datasets to investigate the potential scale of change since 2011 (WAR [APP-551] paragraphs 6.4.6 – 6.4.7):</p> <p><i>'The 2021/22 English Housing Survey (EHS) estimated that in London, the south-east and east of England combined, the PRS has grown by approximately 295,000 households, or by 17% since 2010/11 – now making up around 20% of all homes (compared to 18.4% in the 60-minute areas combined in 2011).</i></p> <p><i>Applying these growth estimates to the average PRS household size in 2011, the WAR estimated that there could be up to 152,000 extra PRS bedspaces in the area today compared with 2011 (a total of 1.152 million bed spaces now).'</i></p> <p>This approach used a number of different sources to assess the accommodation market in addition to the 2011 Census, including the English Housing Survey which considers stock, vacancy and turnover in the national private rented sector up to 2021 and the Valuation Office Agency private rental market summary statistics in England (April 2021 to March 2022)<sup>12</sup> which estimate the mean, median and lower- and upper-quartile rents by size of accommodation.</p> <p>The Applicant notes that not all of the anticipated 2021 Census data has been released to-date – while data has been published on the total number of households and bedrooms in the PRS, there is no published data as yet on 'moving groups' (used to assess the overall level of turnover in the market), so a full update to Section 6 where it relates to Census data would not be possible at this stage.</p> <p>Where possible, the 2021 Census data has been used to update relevant tables in Section 6 of the WAR [APP-551] as summarised below.</p> <p>2021 Census data was released in January 2023 for household tenure and the following table shows how the housing stock compares for overall households and PRS tenures, setting out the proportion</p>

<sup>12</sup> Accessed: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/privaterentalmarketsummarystatisticsinengland>

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		<p>of the whole market represented by the PRS, and the growth rate of the PRS at local authority and national scale.</p> <p style="text-align: center;"><b>Table A.1 Table 1 PRS % Comparing Census 2011 and 2021</b></p> <table border="1" data-bbox="728 448 1989 719"> <thead> <tr> <th></th> <th colspan="3">2011 Census</th> <th colspan="4">2021 Census</th> </tr> <tr> <th></th> <th>Total households</th> <th>Total PRS households</th> <th>%</th> <th>Total households</th> <th>Total PRS households</th> <th>%</th> <th>PRS growth</th> </tr> </thead> <tbody> <tr> <td>Gravesham</td> <td>40,431</td> <td>6,524</td> <td>16%</td> <td>41,724</td> <td>7,950</td> <td>19%</td> <td>22%</td> </tr> <tr> <td>Thurrock</td> <td>62,353</td> <td>8,772</td> <td>14%</td> <td>66,377</td> <td>12,131</td> <td>18%</td> <td>38%</td> </tr> <tr> <td>England</td> <td>22,063,368</td> <td>3,715,924</td> <td>17%</td> <td>23,436,085</td> <td>4,794,889</td> <td>20%</td> <td>29%</td> </tr> </tbody> </table> <p>In summary, the 2021 Census data confirms that: The PRS now accounts for 18-19% of the market locally, compared to 13-16% in 2011. This represents a much higher than national growth rate of PRS homes in Thurrock (38%), and a slightly lower than average growth rate in Gravesham (22%). In terms of absolutes, there are now 4,780 more households in PRS properties in Thurrock and Gravesham, likely to translate into around 10,000 more bedspaces than in the WAR (paragraph 6.4.8) [APP-551] assessment, thereby reducing the impact of the Project's workers on accommodation even more than stated in the WAR [APP-551]. It is recognised that by definition the number of households reported in the PRS has increased in-line with the number of dwellings/bedspaces in the PRS. The 2021 census shows that the PRS has grown at 5x the rate of overall growth in numbers of households, and therefore represents more of the total housing market. The 2021 census, therefore, demonstrates increased PRS capacity, and a higher absolute level of churn and vacancy, compared to the number of workers seeking it (which remains static). The estimated supply of PRS accommodation based on secondary datasets (WAR [APP-551] paragraphs 6.4.6 – 6.4.7) indicated a potential 17% growth in PRS since 2011. This is now known to be an underestimate – the national growth in PRS stock was 29% (see below) with local growth varying but higher than 17% (e.g. in Gravesham the PRS grew by 22%).</p>		2011 Census			2021 Census					Total households	Total PRS households	%	Total households	Total PRS households	%	PRS growth	Gravesham	40,431	6,524	16%	41,724	7,950	19%	22%	Thurrock	62,353	8,772	14%	66,377	12,131	18%	38%	England	22,063,368	3,715,924	17%	23,436,085	4,794,889	20%	29%
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		<p>As such, while the WAR (paragraph 6.4.7) [APP-551] set out that there may be an additional 152,000 extra bed spaces across the study area compared to the 2011 Census baseline, this figure is more likely to be over 180,000. Growth in the PRS has not been uniform across the areas (as expected, growth in urban areas with lots of pre-existing supply outstrips rural locations).</p> <p>The following tables update the key assessments at Table 6.6 and Tables 6.8 and 6.9 in the WAR [APP-551] based on 2021 Census information:</p> <p style="text-align: center;"><b>Table A.2 Table 2 Demand and supply of PRS with 2021 Census data</b></p> <table border="1" data-bbox="730 571 2040 863"> <thead> <tr> <th data-bbox="730 571 1603 619">Area within 60 minutes of main LTC construction compounds</th> <th data-bbox="1603 571 1839 619">North</th> <th data-bbox="1839 571 2040 619">South</th> </tr> </thead> <tbody> <tr> <td data-bbox="730 619 1603 667">Overall demand for PRS bedspaces</td> <td data-bbox="1603 619 1839 667">1,055</td> <td data-bbox="1839 619 2040 667">305</td> </tr> <tr> <td data-bbox="730 667 1603 715">Overall supply of PRS bedspaces (2021 Census)</td> <td data-bbox="1603 667 1839 715">635,504</td> <td data-bbox="1839 667 2040 715">547,033</td> </tr> <tr> <td data-bbox="730 715 1603 762">% of overall supply used by workers</td> <td data-bbox="1603 715 1839 762">0.17%</td> <td data-bbox="1839 715 2040 762">0.06%</td> </tr> <tr> <td data-bbox="730 762 1603 810">Frictional vacancy</td> <td data-bbox="1603 762 1839 810">48,298</td> <td data-bbox="1839 762 2040 810">41,575</td> </tr> <tr> <td data-bbox="730 810 1603 863">% of frictional vacancy used by workers</td> <td data-bbox="1603 810 1839 863">2.18%</td> <td data-bbox="1839 810 2040 863">0.73%</td> </tr> </tbody> </table> <p style="text-align: center;"><b>Table A.3 Table 3 Demand and supply of PRS in the north by local authority with 2021 Census data</b></p> <table border="1" data-bbox="730 970 2040 1396"> <thead> <tr> <th data-bbox="730 970 976 1066">Local authority</th> <th data-bbox="976 970 1122 1066">Workers</th> <th data-bbox="1122 970 1357 1066">PRS bedspaces (estimated)</th> <th data-bbox="1357 970 1603 1066">PRS bedspaces used by workers</th> <th data-bbox="1603 970 1749 1066">Frictional vacancy</th> <th data-bbox="1749 970 2040 1066">% of frictional vacancy used by workers</th> </tr> </thead> <tbody> <tr> <td data-bbox="730 1066 976 1114">Thurrock</td> <td data-bbox="976 1066 1122 1114">570</td> <td data-bbox="1122 1066 1357 1114">24,716</td> <td data-bbox="1357 1066 1603 1114">2.3%</td> <td data-bbox="1603 1066 1749 1114">1,878</td> <td data-bbox="1749 1066 2040 1114">30.3%</td> </tr> <tr> <td data-bbox="730 1114 976 1161">Havering</td> <td data-bbox="976 1114 1122 1161">168</td> <td data-bbox="1122 1114 1357 1161">35,194</td> <td data-bbox="1357 1114 1603 1161">0.5%</td> <td data-bbox="1603 1114 1749 1161">2,675</td> <td data-bbox="1749 1114 2040 1161">6.3%</td> </tr> <tr> <td data-bbox="730 1161 976 1209">Basildon</td> <td data-bbox="976 1161 1122 1209">103</td> <td data-bbox="1122 1161 1357 1209">23,890</td> <td data-bbox="1357 1161 1603 1209">0.4%</td> <td data-bbox="1603 1161 1749 1209">1,816</td> <td data-bbox="1749 1161 2040 1209">5.7%</td> </tr> <tr> <td data-bbox="730 1209 976 1257">Castle Point</td> <td data-bbox="976 1209 1122 1257">74</td> <td data-bbox="1122 1209 1357 1257">11,517</td> <td data-bbox="1357 1209 1603 1257">0.6%</td> <td data-bbox="1603 1209 1749 1257">875</td> <td data-bbox="1749 1209 2040 1257">8.5%</td> </tr> <tr> <td data-bbox="730 1257 976 1305">Brentwood</td> <td data-bbox="976 1257 1122 1305">56</td> <td data-bbox="1122 1257 1357 1305">11,339</td> <td data-bbox="1357 1257 1603 1305">0.5%</td> <td data-bbox="1603 1257 1749 1305">862</td> <td data-bbox="1749 1257 2040 1305">6.5%</td> </tr> <tr> <td data-bbox="730 1305 976 1353">Barking and Dagenham</td> <td data-bbox="976 1305 1122 1353">38</td> <td data-bbox="1122 1305 1357 1353">39,313</td> <td data-bbox="1357 1305 1603 1353">0.1%</td> <td data-bbox="1603 1305 1749 1353">2,988</td> <td data-bbox="1749 1305 2040 1353">1.3%</td> </tr> <tr> <td data-bbox="730 1353 976 1396">Southend-on-Sea</td> <td data-bbox="976 1353 1122 1396">27</td> <td data-bbox="1122 1353 1357 1396">45,612</td> <td data-bbox="1357 1353 1603 1396">0.1%</td> <td data-bbox="1603 1353 1749 1396">3,467</td> <td data-bbox="1749 1353 2040 1396">0.8%</td> </tr> </tbody> </table>	Area within 60 minutes of main LTC construction compounds	North	South	Overall demand for PRS bedspaces	1,055	305	Overall supply of PRS bedspaces (2021 Census)	635,504	547,033	% of overall supply used by workers	0.17%	0.06%	Frictional vacancy	48,298	41,575	% of frictional vacancy used by workers	2.18%	0.73%	Local authority	Workers	PRS bedspaces (estimated)	PRS bedspaces used by workers	Frictional vacancy	% of frictional vacancy used by workers	Thurrock	570	24,716	2.3%	1,878	30.3%	Havering	168	35,194	0.5%	2,675	6.3%	Basildon	103	23,890	0.4%	1,816	5.7%	Castle Point	74	11,517	0.6%	875	8.5%	Brentwood	56	11,339	0.5%	862	6.5%	Barking and Dagenham	38	39,313	0.1%	2,988	1.3%	Southend-on-Sea	27	45,612	0.1%	3,467	0.8%
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**Table A.4 Table 4 Demand and supply of PRS in the south by local authority with 2021 Census data**

Local authority	Workers	PRS bedspaces	PRS bedspaces used by workers	Frictional vacancy	Frictional vacancy used by workers
Gravesham	76	17,462	0.4%	1,327	5.7%
Medway	45	49,422	0.1%	3,756	1.2%
Bexley	40	32,030	0.1%	2,434	1.6%
Dartford	40	18,182	0.2%	1,382	2.9%
Tonbridge and Malling	28	14,698	0.2%	1,117	2.5%
Greenwich	25	58,152	0.0%	4,420	0.6%

The tables above compare directly to tables in the WAR which use 2011 data and show, for example, that the Project peak workforce is expected to account for 2.3% of PRS supply using 2021 data, compared to 2.8% using 2011 data.

The Applicant's conclusion (from this and previous information on demand for accommodation from non-local workers in this note and the WAR) remains as follows:

- Households with a recognised housing duty represent a small proportion of the overall number of dwellings (and PRS dwellings) in Thurrock and Gravesham.
- The PRS is used to discharge some, but not all, of the housing need by the Councils.
- Affordability is a key issue for those in housing need; those households are therefore more likely to be accommodated in only a small proportion of the market.
- The non-local workforce seeking PRS accommodation (76 in Gravesham and 570 in Thurrock) would seek accommodation in a wider range of accommodation types and prices than would be used by the Council to resolve those housing-need duties.
- As a result, the accommodation type sought by local authorities as appropriate to discharge (a proportion of) housing need, and the accommodation sought by the workforce, are not likely to fully overlap (the net effect would be less than the gross).

PINS ID	External Stakeholder (where applicable)	Question / Response
		<p>Therefore, it is unlikely that the effect of the non-local workforce seeking PRS accommodation (e.g. 76 in Gravesham and 570 in Thurrock), who could access almost the entire market, would substantially overlap with existing demand or would have a direct impact on rents.</p> <p>As a result, using the (partially available) 2021 Census data on overall PRS supply leads us to believe that the effect of non-local workforce on the PRS is likely to be less than originally assessed in the WAR, notwithstanding the current lack of information on availability and turnover.</p> <p><u>With regard to the ExA's reference to 'A 2019 report produced by Oxford Brookes University for The New Nuclear Local Authorities Group (NNLAG) on the impacts of the early stages of construction of the Hinkley Point C (HPC) Nuclear Power Station' which the ExA asserts 'identified that the accommodation strategy for that NSIP DCO considerably underestimated the impact on the PRS and that monitoring and mitigation of the impact was not robust'</u></p> <p>The 2019 report produced by Oxford Brookes University for The New Nuclear Local Authorities Group<sup>13</sup> (NNLAG) on the impacts of the early stages of construction of the Hinkley Point C (HPC) Nuclear Power Station referred to by the Examining Authority (and by Gravesham Borough Council within its Relevant Representation) should be treated with caution when referred to in the context of the Lower Thames Crossing.</p> <p>An overall summary of the position (in 2019) states that (emphasis added):</p> <p><u>'Assessment of accommodation actuals against predictions is complicated by differing views of predictions and accommodation type definitions, and especially by most predictions being for peak employment (with all campuses assumed then operating at/near capacity). Actual locations of NHB workers are more concentrated in Sedgemoor (esp. Bridgwater) than predicted, and more in the Private Rented Sector (PRS) tenure category. Where there is data, there does seem to have been some useful housing support initiatives. It is difficult within the constraints of publicly available data, to identify housing impacts on local vulnerable groups, although there does not seem to have been to date a noticeable impact on homelessness in Somerset'</u></p> <p>The Applicant notes that:</p> <ul style="list-style-type: none"> <li>• The report is now four years old, reflective of an early stage of modelling. While monitoring of the PRS is identified as 'orange' by the NNLAG report ('Prediction inaccuracies/gaps in many areas;</li> </ul>

<sup>13</sup> Oxford Brookes University (2019). Hinkley Point C Construction Monitoring and Auditing Study. <https://www.brookes.ac.uk/research/units/tde/projects/hpc>



PINS ID	External Stakeholder (where applicable)	Question / Response
		<p>very limited compliance'), the report acknowledges that it is comparing early monitoring data to an estimated peak which limits accuracy.</p> <ul style="list-style-type: none"> <li>• Assumptions about the accommodation sector used by workers seeking private market accommodation at the Project are cognisant of subsequently reported data from Hinkley Point C and other projects. The WAR [APP-551] estimates that for the Project, 76% of non-local workers would use the PRS or latent accommodation at the peak. Hinkley Point C's most recent monitoring report observed that the equivalent observed rate at Hinkley Point C's (still pre-peak) workforce is 77%.</li> <li>• The report identifies no noticeable impact on homelessness despite there being 1,120 workers using the PRS and latent sectors in a market a fraction of the size of that for Lower Thames Crossing.</li> <li>• Whilst the Hinkley Point C Connection is a useful comparator, the location of the project means that it is closer to urban centres and therefore more likely to be capable of attracting local workers.</li> <li>• The report does not conclude that '<i>monitoring and mitigation of the impact was not robust</i>' – but even so, the Applicant notes that Lower Thames Crossing has committed to a far more comprehensive approach to monitoring as set out within paragraph 5.4.13 of the Framework Construction Travel Plan (FCTP).</li> </ul> <p><u>With regard to ExA's request that '<i>the Applicant advise if and how it intends to monitor and mitigate the impacts of the workforce on the local housing market across the construction period and specifically the impact on housing availability to local vulnerable groups if its tested scenarios prove to be wrong</i>':</u></p> <p>The Applicant has considered monitoring and both proactive and reactive interventions, and set this out in the WAR [APP-551] at paragraph 7.1.1 and the FCTP [APP-546] at paragraph 5.4.13.</p> <p>The proposals create an agile framework to cater for the uncertainty and to work closely with local authorities to respond quickly if issues arise. The approach aims to address impacts should they arise based on evidence provided by the Project's monitoring and local authority data. This enables solutions to be fit for purpose based on the specific issues that occur.</p> <p>In summary the key features of the Applicant's approach are secured by the FCTP [APP-546] at paragraph 5.4.13:</p>



PINS ID	External Stakeholder (where applicable)	Question / Response
		<p>a) <i>'Accommodation Helpdesk – this would be operated by National Highways and would be a tool to assist workers with finding suitable and available accommodation near the Project. The Helpdesk would support prospective providers of accommodation in understanding the Project and its workforce and managing tenancies safely and legally. Workers would not be mandated to use accommodation registered on the Accommodation Helpdesk. The Helpdesk would also oversee collation of monthly data from the contractors and produce accommodation monitoring reports which would in turn inform where workers could be directed/recommended via the Helpdesk. This information will include location of workers, type of accommodation and number of works vs the plan.</i></p> <p>b) <i>Accommodation database – the contractors would be required to create and maintain a live database that monitors the accommodation being used by the workforce in terms of the type of accommodation (on-site project accommodation, private rented, spare rooms/latent, owner-occupied or tourist/visitor) and the location of this accommodation (via a postcode). The contractors would mandate that its workforce, and those of its suppliers, regularly update their information related to the database for every worker. This database would be reported on a monthly basis to members of the Workforce Accommodation Working Group (WAWG).</i></p> <p>c) <i>Workforce Accommodation Working Group – this would include representatives from National Highways, its contractors, and local authorities. The WAWG would receive monthly workforce accommodation monitoring reports from the Helpdesk, and regular updates and information from the Project including 'look-ahead' for potential workforce implications over a 12-month period led by National Highways and contractors. The findings of the workforce accommodation monitoring report would be considered alongside other information, such as other monitoring secured by the Project (e.g., via the FCTP and SEE Strategy (Appended to s106 Agreement, Application Document 7.3)) and information provided by authorities on market conditions and other developments in the local area.'</i></p> <p><i>The FCTP then sets out at paragraph 5.4.14 that 'Contractors would also be required to propose further reasonably practicable measures which encourage a higher proportion of locally employed workers (thereby reducing demand for accommodation) and incentivise workers to live in areas which have higher capacity. Measures would be presented to the WAWG, and National Highways would have due regard to comments raised at that group on the measures to be undertaken'.</i></p>

PINS ID	External Stakeholder (where applicable)	Question / Response
		<p>Following engagement with Thurrock Council and Gravesham Borough Council, the Applicant proposes to add further clarity on this point by adding the following paragraphs in an updated FCTP which will be issued at Deadline 4:</p> <ul style="list-style-type: none"> <li>a) <i>'Visitor accommodation utilisation – the Worker Accommodation Working Group must be provided with details of the reasonable endeavours which the Contractors have used to ensure the use by non-local workers of visitor accommodation.</i></li> <li>b) <i>Collaboration opportunities – the Contractors must provide the Worker Accommodation Working Group with the details of the reasonable endeavours undertaken to coordinate, and jointly manage, construction workforce impacts with the developers of a nationally significant infrastructure project which overlaps with the Order Limits, or of a project identified in the Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes [APP-550].'</i></li> </ul> <p>The Applicant is proposing to amend the existing commitment in the FCTP at paragraph 5.4.14 to review outcomes of the monitoring provided to the WAWG to encourage workers to live in areas where sustainable transport (either existing or provided by the Contractor) is available but which have higher levels of accommodation available. As stated in the original FCTP, these measures would be presented to the WAWG, and the Applicant would have due regard to comments raised at that group on the measures to be undertaken.</p> <p>The Applicant believes that the proactive monitoring of worker accommodation demand including the 12-month look ahead that has been proposed, will allow anticipation and management of impacts within the context of the housing market at that time. Through the precautionary measures outlined above and in particular the approach to regular, detailed monitoring, the WAWG provides a route for key parties to work together on reviewing the evidence and identifying appropriate action.</p>
ExQ1_Q13.1.18	N/A	<p><b>Agricultural Land Loss</b></p> <p>Can the Applicant clarify how much productive agricultural land is being lost to the Project or severed from wider land holdings and why food security has been given so little consideration in the submission?</p> <p><b>Response:</b></p> <p>Table 10.21 of ES Chapter 10: Geology and Soils [APP-148] presents the permanent and temporary loss of agricultural land resulting from the Project. During construction, the Project would result in the</p>

PINS ID	External Stakeholder (where applicable)	Question / Response
		<p>removal from production of 1,589.70ha of agricultural land. Of this, a total of 816.62ha (34.1% of the land within the Order Limits) comprises best and most versatile land (BMV; Grades 1, 2 and 3a in the Agricultural Land Classification system). The agricultural land required permanently for the Project is 984.26ha (paragraph 10.6.22 of ES Chapter 10: Geology and Soils [APP-148]). The remaining 605.44ha would be reinstated following the construction of the Project. As a proportion of UK agricultural land, the agricultural land required permanently equates to 0.006%. Of this agricultural land required permanently, 539.23ha is classed as BMV land, which would equate to 0.003% of UK agricultural land.</p> <p>The National Policy Statement for National Networks (NPSNN)<sup>14</sup> requires agricultural land to be taken account of through seeking to minimise impacts on BMV land (paragraphs 5.168 and 5.176 of NPSNN; and paragraphs 5.180 and 5.194 in the revised Draft NSPNN<sup>15</sup><sup>16</sup>). It does not preclude the loss of BMV land. Planning Statement Appendix A: NPSNN Accordance Table [APP-496] demonstrates how the Project accords with NPSNN policy. An accordance table in respect of the revised Draft NPSNN has been submitted at this deadline (Deadline 4) in response to ExA Question 16.1.1 [Document Reference 9.98]. However, there is no explicit requirement in either the designated or the revised Draft NPSNN for applicants to take account of food security.</p> <p>During route optioneering, the presence of BMV land was a consideration in the route selection process (paragraph 6.5.281 of the Planning Statement [APP-495]). The full assessment of the impacts on BMV land is set out in Section 10.6 of ES Chapter 10: Geology and Soils [APP-148].</p> <p>The assessment of the impact on BMV land in relation to planning requirements is set out in paragraphs 6.5.278 to 6.5.289 of the Planning Statement [APP-495], which conclude that, whilst there are acknowledged impacts on agricultural land, overall the net benefits delivered by the Project are considered to outweigh any adverse impacts, such that the Project can be considered to accord with the policies set out in the NSPNN.</p>

<sup>14</sup> Department for Transport (2014). National Policy Statement for National Networks.

<sup>15</sup> Department for Transport (2023). Draft National Policy Statement for National Networks.

<sup>16</sup> New text added to the revised draft: Soil is an important natural capital resource, providing many essential services such as storing carbon (also known as a carbon sink), reducing the risk of flooding, providing wildlife habitats and delivering global food supplies. Guidance on sustainable soil management can be found in Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.

PINS ID	External Stakeholder (where applicable)	Question / Response
ExQ1_Q13.1.19	N/A	<p><b>Rights of Ways/Bridleways</b></p> <p>There seems to be limited detail regarding future design and maintenance for public rights of ways/bridleways (e.g. types of surfacing and future maintenance liabilities). Can the Applicant explain how rights of way are intended to be maintained, who does the burden fall on, and if it is local authorities what funding will be in place for future maintenance?</p> <p><b>Response:</b></p> <p>The design of Public Rights of Ways (PRoW) would be specified during the detailed design stage taking account of the requirements of the Design Principles <a href="#">[REP3-110]</a>. The Applicant is, at Deadline 4, including a set of Protective Provisions for Local Highway Authorities which include further requirements and process around local highway authorities feeding into the design of local roads.</p> <p>The Applicant's proposals regarding the maintenance of new, altered or diverted highways (which includes PRoWs) are set out in Article 10 of the draft Development Consent Order (DCO) <a href="#">[REP3-077]</a>. Articles 10(1) and 10(2) state that, subject to Paragraph (3) and (4) of Article 10, any highway (other than a trunk road or special road) must be completed to the reasonable satisfaction of the local highway authority and then must be maintained by and at the expense of the local highway authority from its completion.</p> <p>The Protective Provisions mentioned above make further provision around the process of handover and set out requirements in relation to remedying defects prior to the maintenance liability being transferred.</p> <p>The maintenance of both local highways and the strategic road network is funded by the Department for Transport. Local highway funding is mainly based on a formula linked to the total mileage of A roads, B and C roads, and unclassified roads in each area, together with the numbers of bridges, lighting columns, cycleways and footways. This funding is refreshed every few years to take account of changes in road length and number of highway structures. Accordingly, as local highway works are carried out under the DCO, the amount of funding that each local highway authority receives will be amended to recognise these additional responsibilities. 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 strategic road network. The Applicant is making a significant capital contribution to the delivery of the Project, including the upgrades and alterations of new local roads, and so does not consider it appropriate for further requirements to be placed on it.</p>

## Glossary

Term	Abbreviation	Explanation
<b>A122</b>		The new A122 trunk road to be constructed as part of the Lower Thames Crossing project, including links, as defined in Part 2, Schedule 5 (Classification of Roads) in the draft DCO (Application Document 3.1)
<b>A122 Lower Thames Crossing</b>	<b>Project</b>	A proposed new crossing of the Thames Estuary linking the county of Kent with the county of Essex, at or east of the existing Dartford Crossing.
<b>A122 Lower Thames Crossing/M25 junction</b>		New junction with north-facing slip roads on the M25 between M25 junctions 29 and 30, near North Ockendon.
<b>A13/A1089/A122 Lower Thames Crossing junction</b>		Alteration of the existing junction between the A13 and the A1089, and construction of a new junction between the A122 Lower Thames Crossing and the A13 and A1089, comprising the following link roads: <ul style="list-style-type: none"> <li>• Improved A13 westbound to A122 Lower Thames Crossing southbound</li> <li>• Improved A13 westbound to A122 Lower Thames Crossing northbound</li> <li>• Improved A13 westbound to A1089 southbound</li> <li>• A122 Lower Thames Crossing southbound to improved A13 eastbound and Orsett Cock roundabout</li> <li>• A122 Lower Thames Crossing northbound to improved A13 eastbound and Orsett Cock roundabout</li> <li>• Orsett Cock roundabout to the improved A13 westbound</li> <li>• Improved A13 eastbound to Orsett Cock roundabout</li> <li>• Improved A1089 northbound to A122 Lower Thames Crossing northbound</li> <li>• Improved A1089 northbound to A122 Lower Thames Crossing southbound</li> </ul>
<b>A2</b>		A major road in south-east England, connecting London with the English Channel port of Dover in Kent.
<b>Application Document</b>		In the context of the Project, a document submitted to the Planning Inspectorate as part of the application for development consent.
<b>Construction</b>		Activity on and/or offsite required to implement the Project. The construction phase is considered to commence with the first activity on site (e.g. creation of site access), and ends with demobilisation.
<b>Design Manual for Roads and Bridges</b>	<b>DMRB</b>	A comprehensive manual containing requirements, advice and other published documents relating to works on motorway and all-purpose trunk roads for which one of the Overseeing Organisations (National Highways, Transport Scotland, the Welsh Government or the Department for Regional Development (Northern Ireland)) is highway authority. For the A122 Lower Thames Crossing the Overseeing Organisation is National Highways.
<b>Development Consent Order</b>	<b>DCO</b>	Means of obtaining permission for developments categorised as Nationally Significant Infrastructure Projects (NSIP) under the Planning Act 2008.

Term	Abbreviation	Explanation
<b>Development Consent Order application</b>	<b>DCO application</b>	The Project Application Documents, collectively known as the 'DCO application'.
<b>Environmental Statement</b>	<b>ES</b>	A document produced to support an application for development consent that is subject to Environmental Impact Assessment (EIA), which sets out the likely impacts on the environment arising from the proposed development.
<b>Highways England</b>		Former name of National Highways.
<b>M2 junction 1</b>		The M2 will be widened from three lanes to four in both directions through M2 junction 1.
<b>M2/A2/Lower Thames Crossing junction</b>		New junction proposed as part of the Project to the east of Gravesend between the A2 and the new A122 Lower Thames Crossing with connections to the M2.
<b>M25 junction 29</b>		Improvement works to M25 junction 29 and to the M25 north of junction 29. The M25 through junction 29 will be widened from three lanes to four in both directions with hard shoulders.
<b>National Highways</b>		A UK government-owned company with responsibility for managing the motorways and major roads in England. Formerly known as Highways England.
<b>National Planning Policy Framework</b>	<b>NPPF</b>	A framework published in March 2012 by the UK's Department of Communities and Local Government, consolidating previously issued documents called Planning Policy Statements (PPS) and Planning Practice Guidance Notes (PPG) for use in England. The NPPF was updated in February 2019 and again in July 2021 by the Ministry of Housing, Communities and Local Government.
<b>National Policy Statement</b>	<b>NPS</b>	Set out UK government policy on different types of national infrastructure development, including energy, transport, water and waste. There are 12 NPS, providing the framework within which Examining Authorities make their recommendations to the Secretary of State.
<b>National Policy Statement for National Networks</b>	<b>NPSNN</b>	Sets out the need for, and Government's policies to deliver, development of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks in England. It provides planning guidance for promoters of NSIPs on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.
<b>Nationally Significant Infrastructure Project</b>	<b>NSIP</b>	Major infrastructure developments in England and Wales, such as proposals for power plants, large renewable energy projects, new airports and airport extensions, major road projects etc that require a development consent under the Planning Act 2008.
<b>North Portal</b>		The North Portal (northern tunnel entrance) would be located to the west of East Tilbury. Emergency access and vehicle turn-around facilities would be provided at the tunnel portal. The tunnel portal structures would accommodate service buildings for control operations, mechanical and electrical equipment, drainage and maintenance operations.
<b>Operation</b>		Describes the operational phase of a completed development and is considered to commence at the end of the construction phase, after demobilisation.



Term	Abbreviation	Explanation
<b>Order Limits</b>		The outermost extent of the Project, indicated on the Plans by a red line. This is the Limit of Land to be Acquired or Used (LLAU) by the Project. This is the area in which the DCO would apply.
<b>Planning Act 2008</b>		The primary legislation that establishes the legal framework for applying for, examining and determining Development Consent Order applications for Nationally Significant Infrastructure Projects.
<b>Project road</b>		The new A122 trunk road, the improved A2 trunk road, and the improved M25 and M2 special roads, as defined in Parts 1 and 2, Schedule 5 (Classification of Roads) in the draft DCO (Application Document 3.1).
<b>Project route</b>		The horizontal and vertical alignment taken by the Project road.
<b>South Portal</b>		The South Portal of the Project (southern tunnel entrance) would be located to the south-east of the village of Chalk. Emergency access and vehicle turn-around facilities would be provided at the tunnel portal. The tunnel portal structures would accommodate service buildings for control operations, mechanical and electrical equipment, drainage and maintenance operations.
<b>The tunnel</b>		Proposed 4.25km (2.5 miles) road tunnel beneath the River Thames, comprising two bores, one for northbound traffic and one for southbound traffic. Cross-passages connecting each bore would be provided for emergency incident response and tunnel user evacuation. Tunnel portal structures would accommodate service buildings for control operations, mechanical and electrical equipment, drainage and maintenance operations. Emergency access and vehicle turn-around facilities would also be provided at the tunnel portals.

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