

## ExQ1: Questions from Examining Authority

### Gravesham Borough Council Response

(IP ref: 20035747)

Q #	To	Question	Response
<b>2</b>	<b>2.3</b>	<b>Climate Change and Carbon emissions</b>	<b>Implications of Caselaw</b>
Q2.3.1	All IP's	<p><b>Carbon and Climate Considerations: R (oao) Boswell v Secretary of State for Transport</b></p> <p>What are the implications of the recent Boswell v Secretary of State for Transport High Court Judgement <a href="#">[2023] EWHC 1710 (Admin)</a> in relation to the treatment of carbon and climate in NSIP decision-making for the A47 Blofield to North Burlingham, A47 North Tuddenham to Easton and A47/A11 Thickthorn Junction applications for the consideration of carbon and climate matters in the LTC Examination and decision?</p>	<p>The Boswell case turned on relatively limited grounds relating to the cumulative environmental impact assessment of climate change effects.</p> <p>The court decided that in the context of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the Secretary of State was entitled to compare separately the greenhouse gas (GHG) emissions from each of the three schemes under challenge (highways DCOs all involving the A47) with the UK's national carbon budgets for the relevant years and conclude that each scheme was compatible with the UK's trajectory towards net zero emissions.</p> <p>GBC understands that the judgment is likely to be the subject of an appeal.</p> <p>A similar approach to the assessment of GHG emissions has been taken by the Applicant in the LTC scheme as was taken in the A47 cases. The cumulative effect of the Project's GHG emissions has been assessed at a national level, against the UK carbon budgets.</p> <p>The judgment has no bearing on GBC's position on climate, as set out in section 15 of its Local</p>

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			<p>Impact Report and in its submissions at Deadline 2 in response to the Applicant's response to GBC's Relevant Representations. Those latter submissions are set out at paras 2.3 to 2.10 of REP2-080. These include GBC's concerns about the overall level of GHG emissions, and concerns regarding the impacts during the operational phase on ecological receptors and statutory and non-statutory designated sites, including nitrogen deposition resulting in degradation of habitats. They also include the significant contributory role of carbon emissions from traffic on the SRN to carbon emissions within GBC's administrative area.</p> <p>As paragraph 15.10 of the LIR says, the Council are concerned about the cumulative impacts of the Project, in the context of the risk of an increase in development encroachment on protected wildlife sites and mitigation areas. The Council is not yet persuaded that the local implications from the cumulative effect of development in the area (not just road development) have been adequately assessed. These concerns are different from those raised by the claimant in the Boswell case.</p>
<b>3</b>	<b>3.1</b>	<b>Climate Change and Carbon emissions</b>	<b>EIA Regulations</b>
Q3.1.1	All IP's	<b>EIA Regulations 2017: Consideration of Reasonable Alternatives</b> Regulation 11(2)(d) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) imposes a duty on the Applicant to include <i>'a description of the reasonable</i>	See Q3.2.1 in relation to climate change and carbon emissions.  As set out in its LIR (7.50 to 7.54), GBC's main point on the consideration of alternatives relates to the impact of the proposals on the green belt,

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		<p><i>alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment'</i> within the Environment Statement (ES). This obligation needs to be met through consideration of alternatives in terms of '<i>design, technology, location, size and scale</i>' (EIA Regulations Schedule 4). The Applicant has sought to meet this obligation in ES Chapter 3 [APP-141]. The ExA is aware of issues raised in relation to this duty in Deadline 1 and 2 responses. However, it is important that if any remaining IP considers that this duty has not been addressed, that they identify their position and the reasons for it in writing in response to this question. Any response must identify the specific element(s) of the duty that in the IP's view has not been addressed.</p>	<p>which is a matter of policy in the NPSNN rather than a matter for the EIA Regulations.</p>
	<b>3.2</b>	<b>Climate Change and Carbon emissions</b>	<b>Alternatives: Modes &amp; Alignment Corridors</b>
Q3.2.1	IP's concerned	<p><b>Consideration of Alternatives: Other Modes/ Solutions</b></p> <p>Concerns have been raised that insufficient attention has been devoted to the consideration of alternative modes and to solutions making use of public transport.</p> <p>ES Chapter 3 [APP-141] summarises the statutory and policy requirements for the consideration of alternatives and the three main phases in which alternative modes and solutions were evaluated.</p>	<p>National Highways is a government owned company tasked with managing the national strategic highway network in England. They therefore have no direct responsibility of other modes. They are however a managed by the Department of Transport, who do have a remit to consider all transport modes. Improved public transport across the river would address local trips rather than long distance trips but would free up capacity as well as allowing new connections. Currently X80 bus and the Tilbury Ferry are the public transport links. Rail provides indirect links</p>

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		<ul style="list-style-type: none"> <li>• The DfT 2009 study (paragraphs 3.6.1-3) reviewed a range of options including road alignment options, other modes (light and heavy rail and bus), works to the existing Dartford Crossing and composite modes (consisting of road alignment options with other modes) were considered.</li> <li>• The 2016 non-statutory consultation raised concerns about the degree to which non-road or composite modes and solutions had been considered. Following from that exercise, the Post-Consultation Scheme Assessment Report (Highways England, 2017) (paragraphs 3.6.5-6) considered: <ul style="list-style-type: none"> <li>a) No road building and more provision of public transport, including a new rail link and enhanced bus services across the existing Dartford Crossing.</li> <li>b) A combined road/rail link for passengers and freight.</li> <li>c) More priority for bus services on the new crossing and provision of more bus services.</li> <li>d) New ferry services across the Thames.</li> <li>e) A revised national ports strategy.</li> </ul> </li> </ul> <p>Walking, cycling and horse-riding (WCH) measures were also considered, albeit as augmentations rather than as alternatives to the main proposed development.</p> <ul style="list-style-type: none"> <li>• A strategic options re-appraisal was carried out in 2022 which reached a conclusion that the preferred</li> </ul>	<p>across the river via HS1, Elizabeth line, DLR and other National Rail connections.</p> <p>One of the side effects of the Channel Tunnel has been to concentrate cross channel flows on the Port of Dover or the tunnel itself. There is an obvious policy change that could be made, given the destination of many of the flows, which would be to divert some HGV's at least to an east coast port and avoid Kent altogether. Rail freight could also contribute but reducing the costs of Channel Tunnel and HS1 freight usage would be essential. Again this would help reduce the number of cross river trips and free capacity.</p>

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		<p>road option remained as the preferred solution (paragraph 3.6.8).</p> <p>Any IP making submissions to the extent that the consideration of alternative modes and solutions has not been appropriately carried out because relevant statutory or policy measures providing for the consideration of alternatives have not been adequately identified and applied; or because there has not been a sufficient consideration of alternative modes and solutions is requested to address the positions summarised in ES Chapter 3 and explain their detailed case.</p>	
Q3.2.2	IP's concerned	<p><b>Consideration of Alternatives: Other Routes</b></p> <p>Concerns have been raised that insufficient attention has been devoted to the consideration of alternative routes for the LTC.</p> <p>ES Chapter 3 [<a href="#">APP-141</a>] summarises the six broad route corridor options that have been considered (section 3.7, plate 3.1):</p> <ul style="list-style-type: none"> <li>A. Additional capacity at the existing Dartford Crossing.</li> <li>B. Swanscombe Peninsula link to the A1089.</li> <li>C. East of Gravesend and link to the M20.</li> <li>D. M2 to A130 links: <ul style="list-style-type: none"> <li>1. M2 link to A130 via Cliffe/Pitsea; and</li> <li>2. M2 link to A130 via Canvey Island.</li> </ul> </li> <li>E. Isle of Grain link to east of Southend.</li> </ul> <p>Any IP making submissions to the extent that the consideration of alternative corridors have not been appropriately carried out is requested to address the positions summarised in ES Chapter 3 and explain their detailed case.</p>	<p>The route selection process goes back to the original 2009 Parsons Brinkerhoff report and subsequent consultations. In essence the process resulted in a choice between options at A (Dartford) and C (east of Gravesend). As the technical analysis shows, the bulk of the traffic is in some sense 'going round' London, and therefore wishes to remain on the M25 corridor. The 2016 consultation was very confusing on whether a Dartford Crossing option was being considered or not at that time. It was primarily directed at Option C and the western or eastern route alignment options in Kent (and three north of the Thames). The western southern option did not include rebuilding the A2 through the AoNB, which came later. The stated reason for not selecting an option at Dartford was the difficulty of construction with the current crossing in operation.</p> <p>The current scheme however will cause significant disruption to the existing strategic and</p>

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			local road network during construction. In a more positive mode the question to be answered is in current circumstances (not 2016) what the VfM of Dartford Crossing scheme is (say a 4 lane bridge with the tunnels for local traffic and what is now J1a and 30 closed to M25). Cost would be significantly less and would address the actual issue. The LTAM modelling clearly shows that by 2037 the Dartford crossing will be back to where it is now, so the crossing will still need to be managed, as was seen from ASI1 visit to the control room.
<b>4</b>	<b>4.1</b>	<b>Traffic &amp; Transportation</b>	<b>Modelling</b>
Q4.1.14	All	<b>Modelled Traffic Effects: Lower Thames Area Model: TAG Compliance</b> Does <b>any party</b> disagree with the Applicant's conclusion that the LTAM is TAG compliant? If so, please explain why.	See Gravesham ExQ1 Annex 1 Q4.1.14 Modelled Traffic effects
	<b>4.2</b>	<b>Traffic &amp; Transportation</b>	<b>Mitigation</b>
Q4.2.7	LA's	<b>Wider Network Monitoring Approach</b> It has been suggested that the Applicant's approach to monitoring wider impacts contained in the WNIMMP is not compliant with the NPSNN. However, it appears established practice for made DCO's to include provision for wider network monitoring along similar lines as proposed here. Accordingly, please explain why such an approach would be unacceptable in this instance?	7.12 Wider Networks Impacts Management and Monitoring Plan ( <a href="#">APP-535</a> ) section 5 sets out the monitoring proposals. This follows the POPE framework, which is becoming out of date given modern technology. The Council would submit that monitoring should cover local roads as well as strategic and with modern technology can be done annually or more frequently. It is assumed that monitoring of a junction means not just on the A2 (or other main road) but also the operation of the slips and other roads that form part of it, which is the area of primary concern. Additional

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			local roads must be included, particularly where the existing modelling suggest that they may be subject to change. This process should include a commitment to take steps to mitigate any impacts from the project that are more serious than those assumed in the application. The Council will liaise with other IP's to see if a common set of proposals can be made for the ExA to consider.
<b>8</b>	<b>8.1</b>	<b>Waste &amp; Materials</b>	<b>General</b>
Q8.1.4	LPA's	<p><b>Waste Management</b> Can the Local Authorities set out whether you consider:</p> <ul style="list-style-type: none"> <li>• The measures in the dDCO, specifically the commitments in the Register of Environmental Actions and Commitments (REAC) [REP1-157] (eg Commitment MW007) to adhere to the waste hierarchy, are adequate in terms of waste management?</li> <li>• If not, please identify what alterations or additions you would consider to be necessary?</li> </ul>	KCC are the Minerals and Waste Planning Authority. In broad terms Gravesham is broadly content but would comment that MW014 relies on reporting after 1 year whereas Gravesham feels this should be after 6 months to check whether any major variances are occurring, and appropriate action taken.
Q8.1.7	Applicant & LPA's	<p><b>Materials Handling</b> Please could the Parties provide comments on what, if any, further use of wharves close to the Order Limits for the delivery of materials, particularly aggregates, could be utilised? If so, how should the Outline Materials Handling Plan [APP-338] be updated?</p>	Gravesham has suggested to National Highways that there are wharves in Gravesham, with Denton (PLA) and Northfleet (Tarmac) being the most obvious that could be used to supply (or remove) materials. Cliffe Jetty (Brett's - just into Medway) and Clubbs at Denton already import marine dredged aggregates so are obvious sources of material for the project. Both Cliffe Jetty and Northfleet are rail connected (later mothballed). There are highway issues accessing the Denton and Cliffe sites which might require improvements depending on the scale of HGV

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			<p>movements involved or be deemed to have unacceptable environmental impacts. Northfleet feeds directly onto A226 Thames Way (via a tunnel) and hence to the Ebbsfleet junction of the A2. Northfleet has been used to export Crossrail tunnel spoil (so rail in, water out). Hoo junction is a rail yard but with access issues as outlined in the oMHP.</p> <p>The outline Materials Handling Plan (<a href="#">APP-338</a>) needs amendment to reflect the possibility on one TBM which changes where material arises or construction materials are being moved to/from (table 7.1). This includes possible implications from storage of materials on the south side. It is also noted that it is out of date in some places due to the passage of time and the two year construction delay.</p>
Q8.1.9	LPA's & EA	<p><b>Monitoring Consultation/ Approval/ Timescales</b>  Section 11.8 of ES Chapter 11 – Noise and Vibration [<a href="#">APP-149</a>] deals with monitoring. Can you provide your views on:</p> <ul style="list-style-type: none"> <li>• The Applicant's strategy for waste and material management during construction?</li> <li>• The Applicant's strategy for waste and material management during the operational phase?</li> <li>• The Applicant's suggested approach to consultation and approval of these matters through the dDCO [<a href="#">REP2-004</a>], as currently drafted, and the associated REAC within the CoCP [<a href="#">REP1-157</a>]?</li> </ul>	<p>In broad terms Gravesham is broadly content but would comment that MW014 relies on reporting after 1 year whereas Gravesham feels this should be after 6 months to check whether any major variances are occurring.</p>
<b>9</b>	<b>9.2</b>	<b>Noise and vibration</b>	<b>Methodology</b>



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Q9.2.5	Applicant & LA's	<p><b>Duration of Effects</b></p> <p>ES Chapter 12 – Noise and Vibration [APP-150] utilises guidance in respect of the duration of an effect contained within the Design Manual for Roads and Bridges (DMRB), (i.e. 10 or more days in a consecutive 15 day period, or more than 15 days in a six-month period).</p> <ul style="list-style-type: none"> <li>• Please indicate how/ why you could be confident that the duration of effects would not be greater than those predicted in the ES?</li> <li>• Please indicate if any measures would be necessary to monitor any exceedances and, if so, whether any associated reactive mitigation measures would be necessary?</li> </ul>	<p>REAC NV002 of the Code of Construction Practice (APP-336) commits the Applicant to submitting, and subsequently agreeing with the LPAs, CoPA Section 61 Applications for each part of the construction works. This will require detailed noise prediction modelling for each phase of works and, where appropriate, the development of specific mitigation solutions should the predictions indicate that the temporal thresholds would be exceeded.</p> <p>As part of the S61 Application, the requirement to monitor noise and/or vibration levels, and appropriate reactive mitigations measures will need to be agreed prior the respective works activities commencing. As highlighted elsewhere the Council is particularly concerned over the levels of mitigation for the sites with caravans along A226 Rochester Road.</p>
<b>12</b>	<b>12.1</b>	<b>Physical Effects of development &amp; operation</b>	<b>Historic Environment &amp; Archaeology</b>
Q12.1.10	Applicant, LA's & HE	<p><b>Waterlogged Organic Deposits</b></p> <p>A strategy has been included in the oWSI [APP-367] to address any unexpected finds (Sections 7.1.14 and 7.3.127). Section 7.1.14 adds that if the relevant local authority finds that further investigation is needed that no construction would take place within 10m of the remains until further investigation can take place. However, if waterlogged remains are discovered, a greater stand-off may be more appropriate to ensure that the area is not accidentally dewatered before the mitigation strategy is implemented.</p>	<p>KCC Archaeology unit technical advice on this issue should be followed</p>

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		<p>Does the Applicant agree to amending the oWSI to allow the relevant local authority to set a greater stand-off distance for unexpected waterlogged finds?</p> <p>Local Authorities and Historic England shall confirm what would be sufficient to address this issue.</p>	
Q12.1.11	Applicant & GBC	<p><b>Missing Archaeological Fieldwork</b></p> <p>No archaeological fieldwork appears to have been undertaken in the area immediately east of Thong Lane, to the north of Cascades Leisure Centre. There is potential for the land to contain iron age assets, which may be harmed or lost when the land is subsequently regraded to create Chalk Park.</p> <p>Can Gravesham Borough Council advise when they would like this assessment undertaken and how they would like to see this captured in the oWSI [APP-367]?</p> <p>Can the Applicant explain any constraint to undertaking such fieldwork?</p>	<p>Further detail is set out in Gravesham ExQ1 Annex 2 Q12.1.11 attached response. There are concerns about:</p> <ul style="list-style-type: none"> <li>• Plot at the corner of Thong Lane and Rochester Road (Plot 85)</li> <li>• The former Southern Valley Golf Course, now in National Highways ownership (Plot 86)</li> <li>• Nitrogen deposition sites at Shorne</li> </ul> <p>Southern Valley Gold Course was not previously accessible but that can be now dealt with. The necessary technical work needs to be carried out as soon as possible, to the agreed guidelines, and the results taken into account in taking the project forward, which might of course include the need to avoid various areas with consequences for some of the existing spoil and planting proposals.</p>
12	12.2	<b>Physical Effects of development &amp; operation</b>	<b>Landscape Impact</b>
Q12.2.5	LA's, AoNB & NE	<p><b>Mitigation Planting and Photomontages</b></p> <p>It is noted that Register of Environmental Actions and Commitments No. LV003 (contained in ES Appendix 2.2 – Code of Construction Practice, First Iteration of Environmental Management Plan)</p>	<p>This issue has already been discussed in ISH6, with particular reference to Brewers Road Green Bridge, but the principals involved apply with appropriate variation across the scheme. The Gravesham understanding of the position is that:</p>

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		<p>[REP1-157] states that “the first five years of vegetation establishment would be overseen by an Environmental Clerk of Works” and that “failed vegetation in this period would be replaced.”</p> <p>Can the <b>Local Authorities, Kent Downs AONB Unit and Natural England</b> advise whether this period of time is sufficient when landscape mitigation is so heavily relied upon to minimise adverse landscape and visual effects and air quality effects of the project?</p>	<ul style="list-style-type: none"> <li>• All mitigation and compensation planting will be the responsibility of National Highways overall</li> <li>• The relevant contractor will be responsible in the first 5 years for replacement of any failed planting as is normal practice</li> <li>• During the five year period, all failed planting should be replaced in the same or following planting season. It is important to follow this practice in order to ensure that planting has the maximum possible time to establish within the five year period.</li> <li>• After 5 years it falls to the applicant how to meet their obligations. It may be done directly (most obviously land in or around the highway) or by contracting to a third party (especially on larger planting areas like Park Pale or Chalk Park). It is assumed that ongoing management and maintenance by third parties would be fully funded by the Applicant. There are a number of parties already operating in the area such as Kent CC, Gravesham BC, Forestry England, National Trust, who are potentially suitable as they already manage large tracts of land and have the necessary areas of expertise.</li> </ul>
<b>12</b>	<b>12.3</b>	<b>Physical Effects of development &amp; operation</b>	<b>Visual Impacts</b>
Q12.3.1	LA's, HE & AoNB	The agreement with Gravesham Borough Council (GBC) on the locations of photomontages was	The agreement with Gravesham Borough Council (GBC) on the locations of photomontages was

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		<p>taken in 2019, and some time before the design of the Project was finalised.</p>	<p>taken in 2019, and some time before the design of the Project was finalised.</p> <p>The photomontages provided to support the LVIA are useful in conveying the likely appearance of the landscape after the proposal is developed, at Operation and at Design Year (15 years after opening)</p> <p>However, there are areas where photomontages are missing, and are needed to help illustrate the changes to the landscape and to visual amenity that will arise as a result of the proposal.</p> <p>Notably photomontages are needed from:</p> <ul style="list-style-type: none"> <li>a. Viewpoints that will show the proposed junction of the A2 and A122. Photomontages taken from the new Thong Lane South Green Bridge looking west for example, would illustrate the different ground levels, flyover carriageways, and the height and mass of retaining walls and other infrastructure associated with the new junction and its linking roads.</li> <li>b. The area just north of Park Pale (at RVP S-03) on elevated ground on footpath NS161, looking south, would help visualise the potential effects of the proposal at all stages, and the effect of Ancient Woodland mitigation planting on important views.</li> <li>c. The viewpoint in the lane just beyond the north-west corner of Shorne Woods Country Park, (at RVP S-29) where the viewer emerges from woodland to a panoramic view of the open fields</li> </ul>

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			of the Green Belt and the River Thames and Essex coast beyond.
<b>13</b>	<b>13.1</b>	<b>Social-Economic, Local Impacts and Health</b>	<b>Socio-Economic, Local Impacts &amp; Health</b>
Q13.1.1	GBC, KCC, ECC, Thurrock, Havering & Brentwood BC	<p><b>Community Severance - Public Rights of Way</b></p> <p>Paragraph 13.3.25 of ES Chapter 13 – Population and Human Health [<a href="#">APP-151</a>] states that baseline conditions for Public Rights of Ways were identified from definitive mapping on LPA websites. Definitive maps may only show made rights of way and village greens and not any application under consideration.</p> <p>Can the <b>Local Authorities</b> advise whether there are any live applications being considered by their Public Rights of Way departments for amendments to or establishment of new rights of way or village greens that may be affected by the Project?</p>	The Council is not aware of any applications (to Kent County Council or via planning applications) for amendments to or modification of the public rights of way with the Development boundary other than the dDCO for Lower Thames Crossing
Q13.1.4	Gravesham, Thurrock, Havering, Thames Chase Trust	<p>Can the <b>Local Authorities and Thames Chase Trust</b> advise if they agree that the replacement land if of suitable size, location and purpose?</p> <p>It is also noted that public golf facilities in the Gravesend area are affected by the project and that the mitigation for this is not yet resolved. The ExA appreciates that the Statement of Common Ground and the Principal Areas of Disagreement Summary both note that Gravesham Borough Council are seeking replacement facilities, but can <b>Gravesham Borough Council</b> provide specific detail on what type of facilities they are seeking from the Applicant and where? The Council should refer to and provide clarification on Paragraph</p>	Special category land in Gravesham is shown on 2.4 Special Category Land Plans Volume A ( <a href="#">REP3-022</a> ). Land is shown at Park Pale (03-54 & 03-85) for areas lost from Shorne Woods Country Park. Most of the rest is short term for matters related to the construction process. The Council has become aware that on the CPO land at the Cascades Site plot 13-03 on 2.2 Land Plans Vol B [ <a href="#">REP3-011</a> ] is planting that has public access and not part of the lease to Swing Rite Ltd for the pitch and putt. Plot 13-09 is the pitch and putt and is lease but could revert to Gravesham. It should be considered open space in this sense.

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		2.3.77 of ES Chapter 2 – Project Description [ <a href="#">APP-140</a> ] in its response.	<p>At the Cascades site and nearby there are a number of interlocking issues that relate to para 2.3.77 of ES Chapter 2 (<a href="#">APP-140</a>):</p> <ul style="list-style-type: none"> <li>• CPO of land at the rear of Cascades site currently in use as a nine-hole par-3 course and public open space</li> <li>• Its potential replacement by land formerly part of Southern Valley Golf Club just south of the Cascades site fronting on Thong Lane</li> <li>• Redevelopment of the Cascades leisure complex</li> <li>• Implications for the potential loss of revenue and general disruption from the Cascades site due to construction</li> </ul> <p>On the CPO and replacement land a study has been done, funded by the applicant, into high level options for the location of par-3 as it is operated by private firm (Swing Rite Ltd) who also lease the golf driving range, and would like them adjacent to each other. A proposal from the applicant on this is awaited. The Council will report further on this matter when this has been received and considered.</p> <p>The redevelopment of Cascades Leisure facility is has planning permission and is necessary due to the age and condition of the existing facilities. Given the Green belt location the proposal essentially keeps the same footprint but moves the buildings onto the car park and then</p>

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			<p>demolishes the existing. This is unrelated to the Lower Thames Crossing proposal.</p> <p>There is a buffer strip around the Par-3 that is available for public use as are other open areas on the site without specific leisure uses on them.</p> <p>The applicant is not proposing to compensate for the loss of Southern Valley Golf Course, other than the provision of Chalk Park open space, with a comparable facility.</p>
Q13.1.10	GBC	<p><b>Open Space Provision</b> Gravesham Borough Council’s Relevant Representation and its Written Representation both state that the proposed Chalk Park, and other mitigation/compensation areas, extend the open space offer but in an area that is already well provided for. However, Paragraph 7.4.34 of Document 7.10 – Health and Equalities Impact Assessment [APP-539] states that “<i>Chalk Park would provide a recreational landscape for north-eastern Gravesend and Chalk, currently an area of limited public open space provision as identified in Gravesham Borough Council’s Open Space Assessment (Knight, Kavanagh and Page, 2016).</i>”</p> <p>Can <b>Gravesham Borough Council</b> please clarify the correct position on open space provision for Gravesend and Chalk in light of their own published assessment?</p>	See Gravesham ExQ1 Annex 3 Q13.1.10 Open space response
Q13.1.20	Gravesham, Thurrock, Havering & Brentwood	<p><b>Green Belt</b> The ExA acknowledges the Local Authorities’ objection to the proposed development in the Green Belt. Without prejudice to those objections,</p>	See Annex 4: Q13.1.20 Green Belt response

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		<p>the ExA would like to understand from the <b>Local Authorities</b> whether there are any particular locations within the Green Belt where the effects of the Project on openness would be particularly pronounced, and conversely, whether there are locations where effects on openness would be avoided or at the lower end of the harm scale.</p>	