



Lower Thames Crossing

5.4.5.4 Draft Statement of Common Ground between (1) National Highways and (2) Shorne Parish Council (Tracked changes version)

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APFP Regulation 5(2)(q)

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

Volume 5

DATE: ~~October~~ 2023
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Planning Inspectorate Scheme Ref: TR010032
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VERSION: ~~2~~ 0

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Revision history

Version	Date	Submitted at
1.0	31 October 2022	DCO Application
2.0	19 September 2023	Deadline 4
3.0	31 October 2023	Deadline 6

Status of the Statement of Common Ground

National Highways considers that this draft Statement of Common Ground is an accurate description of the matters raised by Shorne Parish Council and the status of each matter, based on the engagement that has taken place to date.

A high-level overview of the engagement undertaken since the DCO Application was submitted on 31 October 2022 is summarised in 0, in Appendix A.

Deleted: This is a Draft Agreed Statement of Common Ground with matters outstanding.¶

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Re: DL4 Endorsement

From: Shorne Parish Council

Dear [REDACTED]

Please accept this email as Shorne Parish Council's agreed Deadline 4 (19th September).

Regards,

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Lower Thames Crossing

5.4.5.4 Draft Statement of Common Ground between (1) National Highways and (2) Shorne Parish Council (Tracked changes version)

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1 Introduction

1.1 Purpose of the Statement of Common Ground

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the Development Consent Order (DCO) application for the proposed A122 Lower Thames Crossing (the Project) made by National Highways Limited (the Applicant) to the Secretary of State for Transport (Secretary of State) under section 37 of the Planning Act 2008 on 31 October 2022.
- 1.1.2 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the Applicant and Shorne Parish Council, and where agreement has not been reached. Where matters are yet to be agreed, the parties will continue to work proactively to reach agreement and will update the SoCG to reflect areas of further agreement.
- 1.1.3 This version of the SoCG has been submitted at Examination Deadline ~~6~~.

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1.2 Principal Areas of Disagreement

- 1.2.1 On the 19 December 2022 the Examining Authority made some early procedural decisions to assist the Applicant, potential Interested Parties and themselves to prepare for the Examination of the Application.
- 1.2.2 One such procedural decision requested that a tracker recording Principal Areas of Disagreement in Summary (PADS) should be used.
- 1.2.3 The PADS tracker would provide a record of those principal matters of disagreement emerging from the SoCG and should be updated alongside the SoCG as appropriate throughout the examination with the expectation that a revised PADS Tracker should be submitted at every Examination deadline.
- 1.2.4 This SoCG should be read in conjunction with the Shorne Parish Council PADS Tracker [\[AS-079\]](#) published 16 March 2023. No other PADS have been submitted by Shorne Parish Council since this submission.

1.3 Terminology

- 1.3.1 In the matters table in section 2 of this SoCG, “Matter not agreed” indicates agreement on the matter could not be reached following significant engagement, and “Matter under discussion” where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. “Matter agreed” indicates where the issue has now been resolved.

2 Matters

2.1 Movement of outstanding matters

2.1.1 Following submission of the previous version of this Draft Statement of Common Ground between the Applicant and Shorne Parish Council, further discussions on the outstanding matters have taken place. These discussions are summarised in 0 in Appendix A and the outcome of these discussions is summarised below.

2.1.2 The following matters have moved from 'Matter Under Discussion' to 'Matter Not Agreed':

[a. 2.1.21 \(Land and Compulsory acquisition\)](#)

[b. 2.1.22 \(Land and Compulsory acquisition\)](#)

[c. 2.1.24 \(Land and Compulsory acquisition\)](#)

[d. 2.1.25 \(Design – Road, Tunnels, Utilities\)](#)

[e. 2.1.27 \(Design – Road, Tunnels, Utilities\)](#)

[f. 2.1.35 \(Design – Road, Tunnels, Utilities\)](#)

[g. 2.1.41 \(Construction\)](#)

[h. 2.1.45 \(Construction\)](#)

[i. 2.1.46 \(Construction\)](#)

[j. 2.1.47 \(Construction\)](#)

[k. 2.1.48 \(Construction\)](#)

[l. 2.1.51 \(Noise and Vibration\)](#)

[m. 2.1.97 \(Population and human health\)](#)

[n. 2.1.98 \(Population and human health\)](#)

2.1.3 Four new matters have been identified for inclusion in the SoCG. The new matters are:

[a. Under the heading 'Road drainage and the water environment' – 2.1.109](#)

[b. Under the heading 'Construction' – 2.1.110](#)

[c. Under the heading 'Operation & Maintenance' – 2.1.111](#)

[d. Under the heading 'Operation & Maintenance' – 2.1.112](#)

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2.1.4 Shorne Parish Council has provided updates to the Applicant on all matters under discussion and updated commentary, which is reflected in this version of the SoCG. As described in paragraph 2.1.2, a number of matters have moved to not agreed. The Applicant notes that discussions are ongoing on a number of matters and will update the commentary in this document once discussions have concluded and a final position is agreed. Where this is the case, the Applicant has noted this in the updated text in this version while the Applicant and Shorne Parish Council continue discussions.

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Deleted: from 'Matter Under Discussion' to 'Matter Not Agreed':...2.1.19, 2.1.53, 2.1.84 and 2.1.100
2.1.19, 2.1.53, 2.1.84 and 2.1.100

The following matter has moved to a more appropriate topic within Table 2.1 but the item number remains unchanged due to signposting between PADS and SoCGs:
Item number 2.1.51 has moved from Operations & Maintenance to Noise and Vibration.

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The following matter has moved to a more appropriate topic within Table 2.1 but the item number remains unchanged due to signposting between PADS and SoCGs:
Item number 2.1.51 has moved from Operations & Maintenance to Noise and Vibration.

- 2.1.5 Table 2.1 details and presents the matters which have been agreed, not agreed, or are under discussion between (1) the Applicant and (2) Shorne Parish Council.
- 2.1.6 In the column 'Item No' in 0, 'Rule 6' indicates a matter entered in the SoCG as a result of a request in the Rule 6 letter, 'RRN' indicates a matter entered into the SoCG as a result of content in the Relevant Representation, 'RRE' indicates an existing SoCG matter that was also raised in the Relevant Representation, 'DL6' indicates a new matter added during examination at/around that deadline and 'OFHX' indicates a new item added in response to matters raised at an open floor hearing.
- 2.1.7 At Examination Deadline 4 there are 112 matters in total of which seven are agreed, 81 are not agreed and 20 remain under discussion.

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Table 2.1 Matters

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
Need for the Project					
Scheme Objectives	2.1.1 RRE	Objectives need review - do not match or address actual problems: The principal problem at the Dartford Crossing is south-to-north traffic volume and flow, queuing and consequent pollution yet very little, and only temporary, relief will actually be delivered by the Project. Improving flow in that direction is inexplicably not an objective of the Project. The Project does not directly help the most deprived areas in North Kent (Grain and Sheppey). Objectives appear to be selected to ensure "Option C" was chosen	The Scheme Objectives were agreed through extensive discussions with the Department for Transport (DfT) and outline what the Project should achieve. The objectives are: 1. To support sustainable local development and regional economic growth in the medium to long term. 2. To be affordable to government and users. 3. To achieve value for money. 4. To minimise adverse impacts on health and the environment. 5. To relieve the congested Dartford Crossing and approach roads, and	Need for the Project [APP-494]	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		rather than according to overall transport needs.	<p>improve their performance by providing free-flowing, north-south capacity.</p> <p>6. To improve resilience of the Thames crossings and the major road network.</p> <p>7. To improve safety.</p> <p>While objectives (5) and (6) do not specifically refer to the south to north capacity, reduction in congestion at the Dartford Crossing and its approach roads, a reduction in journey time and improvements in resilience and connectivity alongside benefits to both the local and regional economy, are the principal benefits which would be delivered through the Project. The 'Need for the Project' sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project. The Project is predicted to result in a significant reduction in traffic flow at the Dartford Crossing, which will also lead to an improvement in air quality at that location.</p> <p>As well as the objectives above, the Project is being developed in line with the National Policy Statement for National Networks, which sets out government policies for Nationally Significant Infrastructure Projects for England.</p>		

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
Scheme Objectives	2.1.2 RRE	Objectives conflate different aims: The Project was originally “sold” as being about improvements at Dartford but discussion has morphed into being about economic improvement. The immediate area around the crossing in the south however receives no benefits only deteriorations.	The Project is expected to deliver a range of benefits including congestion relief at the Dartford Crossing. The improved connectivity across the River Thames and reduced journey times would help local businesses to boost productivity, supporting sustainable local development and regional economic growth. For more information about the Scheme Objectives and economic benefits, see the Need for the Project; the Combined Modelling Appraisal Report Appendix D: Economic Appraisal Package; the Environmental Statement (ES); and the Planning Statement.	Need for the Project [APP-494] Combined Modelling Appraisal Report Appendix D: Economic Appraisal Package [APP-524] to [APP-527] Planning Statement [APP-495]	Matter Not Agreed
Cost of the Project	2.1.3 RRE	Question whether the Project is affordable and represents value for money: Estimated costs have so far increased by 50% to over £8billion and no doubt still rising, while also omitting other required enabling costs such as improvements to the A229 and its junctions with the M2 and M20. There will also be other consequential costs either not presently included or identified	The Appraisal Summary Table within the Economic Appraisal Package (EAP) in Appendix D of the Combined Modelling Appraisal Report summarises the Project's cost and benefits, while the Economic Appraisal Report provides more information about the appraisal methods and results.	Appendix D of the Combined Modelling Appraisal Report [APP-524]	Matter Not Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		post opening, these should all be considered in the financial evaluation.			
Scheme Objectives	2.1.4	Project will not deliver adequate improvement at Dartford, especially for the projected cost. Another bridge is anyway needed at the Dartford Crossing, possibly together with the "A14" long tunnel option bypassing Dartford.	Since the Preferred Route Announcement in 2017, the Applicant has reappraised its routeing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location. The Need for the Project sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project.	Need for the Project [APP-494]	Matter Not Agreed
Scheme Objectives	2.1.5 RRE	Improving resilience of the Thames Crossings is a major objective but has not been discussed so far: Apart from one Figure in the very first consultation, which showed only a "least worst" scenario, there has not been any discussion about how the Project could and will provide resilience to the Dartford Crossing, especially without gridlocking the whole of north-west Kent in the process.	The Need for the Project sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project. The document also provides further details on the Lower Thames Crossing as an alternative route: The Project would provide an alternative route to the Dartford Crossing for local and strategic traffic wishing to cross the river east of London. This would give people more choice when deciding how they want to cross the river east of London but would also provide an alternative in the case of	Need for the Project [APP-494] Comments on WRs Appendix G – Parish Council, Organisations and Groups [REP2-052]	Matter Not Agreed

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		<p>All possible scenarios need to be considered, modelled and published.</p> <p>How resilience will be provided is extremely unclear, enabling works would be needed especially for the south-north direction (e.g., at M25 J2 northbound to A2 eastbound which needs to be free-flowing, and others) but are not included in the Project.</p> <p>SPC Update 31/8/23: Prior to the addition shown we commented that "The answer does not provide any more information about the practical implementation or operational function of the Resilience Objective."</p> <p>The response has been expanded but is still not covering the aspect of what routes diverting traffic will take to reach the A122 from the southern M25 when notified that there is a problem at or in reaching the Dartford Crossing. Gantry signs may tell drivers to use the A122 instead.</p>	<p>major incidents or closures at the other River Thames crossings.'</p> <p>As with the wider strategic road network, the Project will be patrolled by Traffic Officers and managed through the Regional Operations Centre (ROC) at Godstone in Surrey. In the event of an incident occurring on the strategic road network the ROC will liaise with the various emergency services, Traffic Officers, the Applicant's network maintainers and other network authorities including Transport for London to ensure that any delays are kept to a minimum and that incidents are cleared within the Applicant's response times. In addition, Variable Message Signs will advise motorists of traffic conditions so that they can adjust their journeys to suit.</p> <p>The Project is predicted to result in a significant reduction in traffic flow at the Dartford Crossing, which will also lead to an improvement in air quality at that location.</p>		

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		This was covered better in the Applicant's response to TCAG on page 156-157 of REP2-052, as then discussed on pages 12-14 in our response submission at Examination Deadline 3.			
Scheme Objectives	2.1.6	<p>Project needs reality checks: The Project seems to have developed a life of its own without being sufficiently connected to the reality of existing and predicted traffic levels in north-west Kent, which the Project will worsen, or the actual problems that need a solution.</p> <p>Need to consider what success will look like, and the opposite, which outcomes are the Project delivering</p>	The 'Need for the Project' sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the Project.	Need for the Project [APP-494]	Matter Not Agreed
Route selection, modal alternatives & assessment of reasonable alternatives					
Route Selection	2.1.7 RRE	The sequential approach discarded potentially better options from proper reconsideration: Options "D" and "E" were discarded early on but principally over the cost and difficulty of a bridge structure. Once a "tunnel only" solution had been decided, all the options should have been reconsidered in	<p>Since the Preferred Route Announcement in 2017, the Applicant has reappraised its routing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location.</p> <p>The 'Need for the Project' sets out how the identification, selection and design process has responded to the Project's objectives</p>	Need for the Project [APP-494]	Matter Not Agreed

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		that format, also including include a hybrid between options D and E connected to M2 J5 (currently being massively reconfigured).	and how a collaborative engagement process has been used to inform the Project.		
Route Selection	2.1.8 RRE	An up-to-date reappraisal should be published with the DCO: There needs to be assurance that "Option C" remains the best and best value, most viable route.	Since the Preferred Route Announcement in 2017, the Applicant has reappraised its routeing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location. The 'Need for the Project' sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the Project.	Need for the Project [APP-494]	Matter Not Agreed
Route Selection	2.1.9 RRE	Crossings implementation should have started furthest east: If the objectives are reviewed looking at which the Project can and can't deliver, it becomes obvious that there is little point (and there is economic disbenefit) to bringing strategic traffic past the Medway Towns via the M2 when it could have crossed the Thames much further east. The Scheme objectives refer to sustainable development.	The Scheme Objectives were agreed through extensive discussions with the DfT, and outline what the Project should achieve. The 'Need for the Project' sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the Project.	Need for the Project [APP-494]	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
Consultation and engagement					
Adequacy of Consultation Number of Consultations	2.1.10 RRE	<p>Too many Consultations: There have been six Consultations since 2017, it has been very difficult to read all the documents and respond.</p> <p>Often information provided, and therefore comments that had to be made were very similar, other times there were very large differences.</p> <p>Changes were not highlighted so every word had to be read again to detect differences.</p>	<p>The five consultations that have taken place since 2017 have been beneficial to ensure the public and stakeholders have had opportunities to provide feedback on what is a large and complex project as it has developed over time. Development of a project of this scale is an iterative process. As the design develops and is taken to consultation, feedback leads to a need to modify the proposals, and some of these modifications require further consultation. It is normal for a project of this size to hold a series of consultations.</p> <p>As the Applicant developed each consultation, careful checks were undertaken to make sure that the changes from the previously consulted proposals were highlighted, but also that the full nature of the proposals following the changes remained clear.</p> <p>The Applicant undertook the Community Impacts Consultation to directly address concerns raised by local authorities, including Gravesham Borough Council, that further consultation was required prior to submission of the DCO application.</p>	<p>Consultation Report [APP-064 to APP-069],</p>	<p>Matter Not Agreed</p>

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
<p>Consultation information</p> <p>Consultation documents</p>	2.1.11	Consultation documents had varied availability and ease of access: Getting hold of the documents was sometimes difficult and they were not easy to access or view. Cross referencing is extremely difficult as is finding references indicated in National Highways responses.	The Applicant has developed the consultation materials in a way that is designed to help the public access information at the level required. The consultation guides provided an entry point from which people could read in greater detail in the areas that were of particular concern. The Applicant acknowledges that due to the volume and quality of the consultation responses received, the volume of information provided, particularly in the <i>You Said, We Did</i> document, was large. However, it was important to provide responses to all stakeholders. The Applicant worked carefully on the referencing to try and make access into the documentation as straightforward as possible.	Consultation Report [APP-064 to APP-069]	Matter Not Agreed
<p>Consultation information</p> <p>Consultation presentation</p>	2.1.12 RRE	Data not updated, re-presentation misleading: Old data was presented again in different formats rather than the later Consultations containing new/updated data. By altering the formats the false impression was given that that there was new information being published.	During the Community Impacts Consultation, data from the withdrawn DCO submission was used to set out the environmental impacts associated with the operation of the Project. The Applicant applied a simplification to this data to make it more understandable for the public. This was the first time this data had been shared in a public way. The Applicant recognises that because some stakeholders, including Shorne Parish Council, had received the ES that was prepared as part of the withdrawn DCO submission in 2020, they had already seen this data, however there was no intent	N/A	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			to mislead, and the data is considered to be suitably representative of the forecast impacts of the Project.		
Adequacy of Consultation Consultation Promotion	2.1.13 RRE	Publicizing varied greatly, and therefore affected the number and nature of responses elicited, impact of consultation fatigue: The first Consultation was e-mailed to the entire Dart Charge e-mail list, this skewed both quantity and quality of the responses, whether they looked at the full documentation or just believed the headlines. Subsequently the number of responses has fallen to very low numbers (only 1206 in July 2021), although overall quality of responses may therefore be higher.	At the start of the Statutory Consultation the Applicant used the Dart Charge email to notify customers of the Dartford Crossing. One of the objectives of this consultation was to gather information on the need for the Project and impacts on road users, and as one Project objective is to relieve the congested Dartford Crossing and approach roads, the Applicant considered it appropriate to consult the customers. The Applicant then also used this channel for the Community Impacts Consultation in July 2021 (responses actually totalled 3,218), again to understand the impacts on customers. At each consultation the Applicant has reviewed each response on its own merits, to understand the individual concern. While the Dart Charge emails did likely lead to a significant increase in the responses, this did not lead to a reduction in the level of consideration given to a local respondent.	Consultation Report [APP-064 to APP-069],	Matter Not Agreed
Consultation Information	2.1.14 RRE	Misleading Consultation information: The first Consultation showed a two lane tunnel, no other structures, a very small A2 junction footprint, narrow	The Route Consultation in 2016 was for a tunnel with two lanes. This consultation set out a series of route options for consideration and resulted in the Secretary of State selecting the current proposed	Consultation Report [APP-064 to APP-069],	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		emergency access, no side feeder roads etc – these and other aspects were then superseded by very different and greatly expanded proposals. These omissions would have misled responders about the true impact.	route in 2017. This consultation was undertaken at a relatively early stage of design, when it was considered that only two lanes would be required to meet the Scheme Objectives, and all routes were presented on a similar basis (i.e. all routes were represented as two lanes in each direction). Following the selection of the route, the design and traffic modelling were developed further, and it was identified that three lanes were required. This was reflected in the proposals set out in the Statutory Consultation in 2018, and in consultations after that. Prior to the Statutory Consultation in 2018, a review was undertaken to consider the changes that had been made to the Project, including the changes both to the connection between the Project and the A2, and the increase from two to three lanes. This review found that the increased scale of the Project (noting that similar modifications would have been needed at other locations) would not have led to the Secretary of State making a different decision in 2017.		
Responses Consultation Responses	2.1.15	Not all concerns raised are addressed or given a public response: Some concerns that have been raised by many responders are not addressed or receiving a response. Response	Due to the volume of consultation responses (28,493) provided at Statutory Consultation, it was not practical to provide a response to each individual response. Instead, a process of coding the responses to provide a single response to multiple	Consultation Report [APP-064 to APP-069]	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		documents discuss the most frequently raised concerns but there could be important points raised by only one person, these should be included rather than being edited out and hidden/ignored. Responses in response documents are often repetitive pasting and not truly answering the point raised, they can come over as dismissive of valid concerns.	issues was undertaken. This approach is set out in the Consultation Report, and an earlier version of the report was provided to Shorne Borough Council for consideration. This process informed the preparation of the <i>You Said, We Did</i> document, as well as the consultation report. This approach is commonly used for projects of this scale, and aligns with guidance.		
Consultation information "Ward summary" presentation	2.1.16	"Ward summary" presentation disguised disbenefits: Some data was presented in Ward Summaries, this had some benefits but also disbenefits for the largest Ward south of the river Thames (Shorne, Cobham and Luddesdown) because it is so large, stretching from the middle of the Thames to the southernmost parts of Gravesham, and the impacts vary greatly within its area, being greater north of the A2 than to its south.	The decision to use ward boundaries to present the Project's impacts was discussed with local authorities before consultation and the Applicant considered feedback on the approach and the ward selection at that time. While drafting the ward summary chapters, the Applicant accounted for the fact that some wards were larger than others and that some were more heavily impacted than others. The Applicant tailored the information in each ward to the size and level of impacts, and some wards with fewer or similar impacts were presented together in a joint chapter. Larger and more heavily impacted wards were presented with one ward per chapter. Shorne, Cobham and Luddesdown ward was one of the largest	Consultation Report [APP-064 to APP-069],	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		For future publications the ward should be split along the A2 into north and south sections. SPC note July 2022 – The warding arrangements were changed in the recent Electoral Boundary Review, Shorne is now combined into a Ward with Higham. So future publications should consider Shorne and Higham separately.	wards featured in the document and the Applicant provided more information in its chapter, ensuring that the content was proportionate to the impacts. For example, the Shorne, Cobham and Luddesdown chapter was 94 pages long, with more information about the northern section of the ward that would be most affected by the Project. Nearby Higham ward was covered in 58 pages because it covers a smaller area and would be impacted by the Project to a lesser extent. Overall, the Applicant believes its Ward Impact Summaries document has provided consultees with a proportionate amount of information about the areas that would be affected by the construction and operation of the Project.		
Consultation Information Provision	2.1.17 RRE	Withheld or "Confidential" information provision: Not all information that we needed/requested was provided to the Parish Council, this is very frustrating and still ongoing. Updated traffic data in particular has been provided to Gravesham Borough Council and Kent County Council under a Confidentiality agreement but not to the Parish Council. National Highways say that Gravesham Borough Council	The Applicant has provided detailed information to Shorne Parish Council. To supplement the information provided during the public consultations, the Applicant has provided the withdrawn DCO application documents, which included full documentation of the traffic model. The Applicant takes a proportionate approach to the sharing of information and has worked with local planning authorities and highways authorities to make sure these have access to the latest data sets. Nevertheless, the data provided to Shorne Parish Council is	N/A	Matter Not Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		can provide it to us but GBC consider that they cannot.	considered to be representative for the purposes of understanding the impacts, both adverse and beneficial, of the Project.		
Consultation Route Design changes	2.1.18 RRE	Decision making processes are opaque: Aspects of the proposals change without us being able to understand why, this is sometimes connected to Statutory bodies such as Natural England, Areas of Outstanding National Beauty (ANOB) – “stakeholders” who do not consult or communicate with residents and Parish Councils but influence the plans from afar without having or seeking any local knowledge. National Highways give these non-representative organisations too great a weight.	The Applicant works hard to balance the concerns of all stakeholders in making decisions relating to the Project. The framework for consideration is set out in the National Policy Statement for National Networks (DfT, 2014), which sets out how certain aspects, such as impacts on AONB, impacts on Green Belt, and environmental impacts such as noise and air pollution, should be considered. This needs to be factored into the decision making, and at times leads to certain statutory bodies which are tasked with protecting specific designations or assets, being given additional weight.	N/A	Matter Not Agreed
Collaboration Collaboration of the Project with Local Authorities	2.1.19	Too much working is isolation by Local Authorities: The different local authorities have different responsibilities but their inputs into planning also overlap. While it is good if several responses say the same thing independently of each other, given the enormous size and consequences of the project it would be better if there was a requirement and facilitation	The Applicant cannot determine how local authorities choose to work. The Applicant has set up a number of joint sessions with the local authorities but cannot influence how they work together. Following discussions during Issue Specific Hearing 1, it was requested that the Applicant provide a document describing the criteria used to determine how requests for local traffic modelling would be considered. The Applicant submitted this	Localised Traffic Modelling and Appendix A [REP3-126],	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p>to collaborate between local authorities working together and including SPC.</p> <p>SPC update: This point originally related to matters prior to the DCO however the problems are continuing along with on-going local modelling.</p> <p>It is true that NH can't influence collaborative working positively but this is not taking place in a free environment but one that has been constrained by NH. NH have influenced collaboration negatively through having secrecy agreements over data provision.</p> <p>We continue to object to this approach by/attitude from NH.</p> <p>As data inputs from traffic surveys are factual, observational matters we see no reason why they should be kept secret. The same applies to the "Cordons" from LTAM that have been supplied to various local authorities.</p>	document, which is called Localised Traffic Modelling, at Deadline 1.		
Documents & Information	2.1.20	In 2017 SPC requested an additional information event to be held in Shorne West/Riverview.	In response to this request, the Applicant held an additional event for Riverview residents.	N/A	Matter Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
Information event request					
Land and Compulsory acquisition					
Impacts Extent of order limits	2.1.21 RRE	Enormous land take: After expansion of the order limits and compensation/mitigation land needed, Shorne has about one third of its total area affected. <u>SPC Update: Factual matter therefore our opinion has not changed and cannot change unless/until the project gets cancelled.</u>	Throughout the development of the Project, land use has been revised as the proposals have been progressed. Between Statutory Consultation in 2018 and Supplementary Consultation in March 2020, the Order Limits increased, largely due to additional land needed to divert utilities and the development of the proposals to establish natural habitat areas, including the planting of trees and vegetation. Following Supplementary Consultation, work continued with stakeholders, including utility companies, to refine the proposals and minimise the land needed. Consultation took place on the revised Order Limits (22.9km ² across the whole Project) during Design Refinement Consultation in July 2020. This reduced the amount of land needed for the Project from that proposed at Supplementary Consultation (26km ²), while remaining above what was proposed at Statutory Consultation (21km ²). At Community Impacts Consultation in July 2021 the Order Limits were reduced further to 22.2km ² . At Local Refinement Consultation (May 2022) following engagement with stakeholders and	<u>Land Plans [REP5-004 to REP5-008]</u> <u>Statement of Reasons [REP4-100]</u> <u>Need for the Project [APP-494]</u>	Matter <u>Not Agreed</u> ,

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 ¶ Statement of Reasons [\[REP1-041\]](#)
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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			<p>refinements to the utility design, the Order Limits were further refined in certain areas and increased to 24.35km².</p> <p>Land was added to include four habitat compensation areas including Shorne Woods. These sites are proposed to compensate for the potential effects from nitrogen caused by the forecast changes in traffic as a result of the Lower Thames Crossing.</p> <p>The land required for the Project is shown on the Land Plans and the reason each plot is required is explained in the Statement of Reasons. Reducing the impacts of the Project on the environment is one of the Project requirements (see the Need for the Project). At every step of the Project's lifecycle, consideration has been given and efforts have been made to reduce the environmental impacts, while still fulfilling the needs of the Project. The Applicant has followed the mitigation hierarchy of 'avoid, minimise, restore and compensate' to protect the environment in which it would be situated and in keeping with industry best practice.</p>		
<p>Planning and Policy</p> <p>Green Belt impact</p>	2.1.22	The land that the crossing will take is Green Belt, what is supposed to be a strategic gap between built up areas and providing them with green	<u>The Project is located within the Green Belt and is considered to be inappropriate development as a whole. Linear Nationally Significant Infrastructure Projects often pass through designated Green Belt as</u>	Planning Statement Green Belt Report	Matter <u>Not Agreed</u>

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p>recreational space and clean air. There should be a specific discussion about impact on Green Belt Land (as well as Ancient Woodland, SSSI's, Special Protection Areas, Ramsar Site etc).</p> <p><u>SPC Update: Agree that Green Belt has been specifically discussed as the point requested however we do not agree with the assessment that damaging the Green Belt here is justified by "very special circumstances" or that the presumption against development can therefore be overturned.</u></p>	<p><u>recognised within the National Policy Statement for National Networks. The Applicant's view is that there are very special circumstances for the Project as the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Planning Statement Appendix E – Green Belt provides an assessment of the Project against green belt planning policy and was submitted in support of the DCO application. The Applicant's position is that there has been a lengthy route selection process and many years of consultation throughout the development which has resulted in the least impactful solution for the Green Belt. The Applicant has demonstrated the overriding need for the Project and the benefits it will deliver (as set out in the Need for the Project) constitute the very special circumstances necessary to override this policy position.</u></p>	<p>Appendix E [APP-500]</p> <p><u>Need for the Project [APP-494]</u></p>	
<p>Land acquisition</p> <p>Order limits selection methods</p>	2.1.23	<p>Opacity of inclusion and exclusion of land from order limits: The method by which land is included/excluded is opaque and seems to have involved some negotiations which may not be in the interest of all local residents. E.g. if one piece of land is negotiated out, another person's</p>	<p>For any land within the Order Limits, the Applicant must be able to demonstrate its need, or function, and also evidence compliance with statute and policy guidance.</p> <p>Planning Act 2008 compulsory purchase guidance (Department of Communities and Local Government, 2013) states:</p>	N/A	Matter Not Agreed

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		land may be taken, even if much more remotely from the Project. Effect of taking land that speculators would like to develop, sends problems elsewhere.	<p><i>“Section 122 of the Planning Act provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that:</i></p> <ul style="list-style-type: none"> <i>the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development..., and</i> <i>there is a compelling case in the public interest for the compulsory acquisition.</i> <p><i>Applicants must therefore be prepared to justify their proposals for the compulsory acquisition of any land to the satisfaction of the Secretary of State.”</i></p> <p>It goes on to say: <i>“The applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The applicant will also need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate.”</i></p>		
Viability	2.1.24	Severance of land and farm viability, loss of productive farmland: Some proposals have rendered farms non-viable or	Agricultural land impacts are provided in ES Chapter 10: Geology and Soils, which will be informed by information contained within	ES Chapter 10: Geology and Soils [APP-148]	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
Loss of agricultural land		<p>taken the centre rather than the edge. Loss of productive farmland threatens food security and increase food miles.</p> <p><u>SPC Update: Explaining NH's reasons does not alter the impacts. This is largely a factual matter.</u></p> <p><u>References APP-148 and APP-302 have been reviewed but do not seem relevant to the point raised.</u></p>	<p>Appendix 10.4 (Agricultural Land Classification).</p> <p><u>ES Chapter 10: Geology and Soils provides the assessment of the Project on agricultural land during construction and operation. ES Appendix 10.4 Agricultural Land Classification Factual Report sets out the quality of agricultural land within the Order Limits. ES figure 10.4 Agricultural Land Classification Mapping presents the results of the detailed agricultural land classification survey.</u></p>	<p><u>ES Appendix 10.4: Agricultural Land Classification Factual Report [APP-425]</u></p>	
Design – Road, Tunnels, Utilities					
Green bridges Green bridges, width and nature	2.1.25	<p>Width can always be greater, using a lot more cut and cover, this would increase protection of nearby residents from noise, light and air pollution.</p> <p>Discrepant plan for Thong Lane green bridge not yet corrected. Question likelihood of anything being able to grow in the fumes from 18 lanes of tarmac.</p> <p><u>SPC Update: It was very interesting to see the opinions of other IP's through the WR's, they accord with our own opinions.</u></p>	<p>The green bridge carrying Thong Lane over the Project was widened as part of design revisions presented during supplementary consultation.</p> <p><u>Also, at the Local Refinement Consultation in 2022, the Applicant widened the replacement green bridge at Thong Lane over the M2/A2 by a further 10 metres.</u></p> <p>The design of these green bridges has been informed by the practicalities of constructing replacement structures over the A2, while needing to avoid the total closure of the A2 during this process, as its closure was deemed to be too impactful to the wider road network. This balance between level of 'greening' and keeping the A2 open during</p>	<p>Appendix B of Design Principles [<u>REP4-146</u>]</p> <p><u>Project Design Report Part D: General Design South of the River [APP-509]</u></p>	<p>Matter <u>Not Agreed,</u></p>

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<u>SPC note the design discrepancy of Thong Lane North, south side has been corrected.</u>	<p>construction is something that the Applicant discussed during design workshops with Gravesham Borough Council and Kent County Council. The Applicant has therefore sought to provide as much planting as possible on the green bridges that span the A2 corridor without requiring closure of the strategic road network in this location or impacting on third-party green bridges that span the gap between the A2 and HS1 railway, which the new A2 green bridges need to tie-in to, thereby providing connectivity across the whole A2-HS1 corridor. Further information is contained within the Design Principles document (Appendix B Project Enhanced Structures – Bridges).</p> <p>Regarding Thong Lane north green bridge, the Applicant acknowledges that it was shown incorrectly as a straight line (instead of curved) at Community Impacts Consultation. This has been corrected in the latest consultation material.</p>		
<p>Infrastructure/Landscape Integration</p> <p>Loss of A2 wooded central reservation</p>	2.1.26	Unhappy about the highly wooded central reservation being lost, it softens the appearance and masks noise.	Options were explored to either retain or reinstate the central reservation. However, both options would have resulted in the further widening of the A2/M2 corridor and encroach further into the adjacent ancient woodland and SSSI areas. It was felt better to keep the A2/M2 corridor as narrow as	N/A	Matter Not Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			possible to reduce impact on the existing woodland.		
Infrastructure/Landscape Integration Landscaping for local benefit	2.1.27	Landscaping should be focused on and primarily to benefit local residents before any beautification to improve user experience. <u>SPC Update: Our opinion has not changed.</u> <u>Having looked at the cross sections now provided it is obvious that the LTC:A2 junction will be highly visible, detrimentally so, for residents of Shorne West and Riverview Park. Also that ambience of some walking routes is poor.</u> <u>There need to be greater use of bunding along margins of elevated roads.</u> <u>The cross sections also bring into question the location of Chalk Park, the waste chalk mound might be better positioned north of the A2 and west of the LTC:A2 junction.</u>	The Applicant's aim is to provide a balance of suitable mitigation against the existing heritage and character of the local area. For example, Thong Village conservation area is described as having open views out to the countryside, so where possible these have been retained. Woodland planting has been provided to the south-west of Thong Village to provide visual screening of the junction and its associated infrastructure. To the west the Project is in a cutting, so where possible, open views are retained. A walking, cycling and horse-riding strategy has been woven into the landscape design to ensure a variety of routes in this area, connecting Gravesend with the wider countryside and the country parks. The Project Design Report sets out how the preliminary design was developed in <i>Part D: General Design South of the River</i> and <i>Part E: Design for Walkers, Cyclists and Horse Riders</i> . <u>To address concerns raised by Interested Parties during Examination, the Applicant has produced a number of additional cross-sections and enhanced cross-sections which show the elevations across the junction and surrounding area. The enhanced cross-sections show the</u>	Project Design Report Part D: General Design South of the River [APP-509] and Part E: Design for Walkers, Cyclists and Horse Riders [APP-512] Enhanced Cross Sections (Part 1 of 2) [REP2-069] Engineering Cross Sections [REP2-070] Enhanced Cross Sections (Part 2 of 2) [REP2-071]	Matter <u>Not Agreed</u> ,

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			<p><u>proposed planting through the junction and how this has been designed to help screen the link roads.</u></p> <p><u>The location of Chalk Park has been selected for several reasons, which include:</u></p> <ul style="list-style-type: none"> <u>• To reduce the impact on Kent AONB and maintain the characteristic rolling landforms in this area.</u> <u>• To take into account the setting of the village of Thong. To maintain as much "open aspect" between the edge of Gravesend East to the conservation area as possible</u> <u>• The existing topography – the existing hill at the chosen location of Chalk Park means we can exaggerate the landform without completely altering its character. The landscape around Thong is more gently rolling and would be fundamentally changed by the deposit of a large amount of earthworks there.</u> <p><u>Beneficial placement – material cannot be placed without a good justification for its location and use. The Applicant has developed Chalk Park to be an open space and "stepping stone" to Shorne woods country park. The chosen location gives people to the North -west of the alignment, with a deficiency of access to semi-natural open space, better access to it.</u></p>		

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
Design Removal of access from northern feeder road to M2 eastbound	2.1.28	Removal of access from northern feeder road to M2 eastbound, should be restored: This was in earliest plans then removed without prior discussion. Claims of lack of safety are not accepted as valid, it should be reinstated. Removal means a long diversion for some directions of traffic via routes that will be choked/jammed at peak hours. There will be an increase in rat running through Shorne by traffic previously turning onto the A2/M2 at Brewers Road.	A direct link is not provided to the A2/A289 however a new two-way local link road is provided to cater for this movement. A direct link to the M2 eastbound is provided.	N/A	Matter Not Agreed
Design Increased journey times	2.1.29	All directions of travel are being made more difficult and journeys will be longer, traffic light facilitation is needed: From Shorne and Gravesend East it will be exceedingly difficult to make many journeys (including accessing stations, supermarkets and shopping centres): To reach A2 westbound requires negotiating several traffic light-controlled roundabouts. To reach M2 eastbound requires long diversion of extra 2km on A289 northbound then U-turn at	The Applicant has looked at the junction configuration and has provided more direct connectivity between Gravesend and the M2 eastbound; and has redesigned the Gravesend East junction and link roads to improve journey times and reduce the impact on the local roads. The Applicant would like to clarify that the A2 corridor and local road network (LRN) has been designed to current standards and traffic modelling undertaken to assess its impact on traffic flows. This has shown that the layout and capacity of referenced	Supplementary Walking, Cycling and Horse Riding (WCH) Maps (Volume A) [REP2-072] Design Principles [REP4-146]	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p>Higham, already a busy and jam prone route, this needs traffic light facilitation.</p> <p>An alternative route via northbound from Shorne village requires a hazardous right turn at a busy and fast crossroads on the A226, this needs traffic light facilitation.</p> <p>Traffic from Gravesend East cannot access the A2/A289, only the M2, this will also lead to traffic travelling further and for longer. The design there should also be revisited as an extra link could be provided.</p> <p>Difficulty exiting Thong Lane onto the southern two-way link road when wanting to travel west on the A2 as need to turn right across the dominant traffic flow, may need traffic lights or yet another roundabout.</p> <p>Increased journey times for local residents cause increased personal costs.</p> <p>SPC Update 31/8/23: Our opinion has not changed. The discussion here is about drivers not WCH.</p>	<p>junctions are suitable for the predicted traffic flows.</p> <p>In addition, a review of the pedestrian crossings has been undertaken and controlled crossings are to be provided where required. The proposed location of crossings South of the River are presented in the Supplementary Walking, Cycling and Horse Riding (WCH) Maps (Volume A). The principles that would be considered in further design of WCH routes are described in Section 4.2 of the Design Principles.</p>		

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		<p>The design may well be to "current standards" but that doesn't mean that it is a good and functional design, Junction modelling data shows that the Brewers Road off-slip is poorly functioning and that traffic is likely to back up onto the northern feeder road as we had said previously.</p> <p>We also disagree with NH's opinion stated in their ISH 1 response (our points have been misinterpreted) in REP1-183, B.3.6 page 57 that only 5 trips per hour might U-turn at the A226:A289 junction. This has been explored further on page 14 in our REP3-TBA response.</p> <p>In our view traffic lights are needed at the T-junction at the southern end of Thong Lane.</p>			
<p>Design</p> <p>Reduction of M2 to two lanes eastbound through Gravesend East</p>	<p>2.1.30</p> <p>RRE</p>	<p>The width of the M2 line has been reduced from current four lanes to only two through Gravesend East, SPC do not believe this will be adequate.</p>	<p>This section will still provide the capacity for the forecast traffic flows for two lanes (Transport Assessment). Appendix C of the Combined Modelling and Appraisal Report Appendix C: Transport Forecasting Package, will have some of the flow numbers (including at the M2/A2/A122 Lower Thames Crossing junction).</p>	<p>Transport Assessment [REP4-148 to REP4-152]</p> <p>Combined Modelling and Appraisal</p>	<p>Matter Not Agreed</p>

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				Report Appendix C: Transport Forecasting Package [APP-522 and APP-523]	
Safety Sight lines exiting Shorne Ifield Road to Thong Lane	2.1.31	Sight lines exiting Shorne Ifield Road to Thong Lane need improving: The Project works are altering the road layout so that Shorne Ifield Road emerges on the inside of a blind bend with inadequate visibility, this needs to be corrected by revising the alignment of Thong Lane.	The Applicant has clarified that the realignment of Thong Lane has been designed to current standards and the required visibility at this junction is provided in both north and south directions.	N/A	Matter Not Agreed
Safety Lack of hard shoulders	2.1.32	Raised many times, whether classified as Smart Motorway (as originally), Expressway or whatever the Project is now being called (All-purpose trunk road?), hard shoulders are needed for safety reasons.	Improving safety is one of the Project's objectives. The Lower Thames Crossing would be an all-purpose trunk road, similar to the A13 and other A-roads. It is being designed and built to the highest safety standards recommended, but the Applicant will continue to adapt its proposals in line with new guidance. The new road's safety features would include vehicle detection, emergency areas, variable mandatory speed limits and lane closure signals in the event of an incident, such as a vehicle breakdown or collision.	Consultation Report [APP-064 to APP-090]	Matter Not Agreed

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			Control measures across the route, including in the tunnel, would identify vehicles stopping in a live lane and allow for rapid changes of traffic management to avert danger. In the tunnels, recovery services would be provided for any stopped vehicle. Technology would also help the emergency services to access incidents. This includes signage that can be changed to alert road users of lane closures, speed restrictions and incidents ahead. If one tunnel is blocked, emergency vehicles could access incidents using the pedestrian cross-passages that connect the two tunnels at regular intervals. Further information is presented in the Consultation Report.		
Design Location and nature of southern tunnel control building, and pumping stations, other structures	2.1.33	Extra structures appear on new plans despite assurances that will not happen, questions about the tunnel control building and pumping stations remain unanswered.	At Supplementary Consultation the Project consulted on three potential locations for the proposed substation at the A226, the preferred location of which was presented at the Design Refinement Consultation. Also at the Design Refinement Consultation, the Applicant communicated the proposal to install a compound along Thong Lane for the relocated switchgear equipment. Following feedback, the proposals were combined at the A226 and presented at Community Impacts Consultation.	N/A	Matter Not Agreed

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			The South Portal Tunnel Services Building and potentially the pumping station will be located within the portal itself.		
Project Design and Mitigation Tunnel Drainage	2.1.34	SPC felt that more information on the method and route for tunnel drainage was required but acknowledge the National Highways comment and now understand that this will be further explained in the Hydrogeological Risk Assessment. <u>SPC Update: Requires further reading of documents.</u>	Tunnel drainage will be pumped to a treatment and storage facility in the vicinity of the north portal and discharged from a new outfall that would be constructed on the north bank of the River Thames in proximity to the existing Bowaters Sluice. ES Appendix 14.5: Hydrogeological Risk Assessment provides further information.	ES Appendix 14.5: Hydrogeological Risk Assessment [APP-458 and APP-459]	Matter Under Discussion
Design Design for local weather conditions	2.1.35	Design must be for true local weather conditions (e.g. torrential rain, sea fogs as in Estuarine weather) and for peaks rather than looking at averages measured at distant monitoring stations e.g. rainfall data used was from Heathrow. <u>SPC Update: This is about the present not the future, so the answer does not completely fit the questions.</u> <u>Dealing first with fogs, the documents just say that these may happen and cause problems that impact on road users (impact, i.e. accidents, being the</u>	The Applicant has designed the Project for the appropriate <u>weather</u> conditions and has taken extreme weather events into account. <u>The Applicant has followed National Highways' Design Manual for Roads and Bridges (DMRB) guidance to design the Project which provides the minimum requirement for all aspects of highways design and highways assets. The DMRB also sets out the requirement for Road Safety Audits which will identify any potential issues that may require a change to the design. The Applicant has undertaken the Stage 1 audit which showed no concerns that needed to be addressed at this design stage. The Applicant is satisfied</u>	ES Appendix 15.3: Climate Resilience Impacts and Effects [APP-482] ES Appendix 4.2: Major Accidents and Disasters Long List [APP-341]	Matter <u>Not Agreed</u>

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		<p><u>anticipated problem as happened at the Sheppey Bridge A249). The point is that fogs occur more frequently in this location than further west.</u></p> <p><u>Our concern is that the road drainage can cope with torrential rain without there being overflows. We are not reassured.</u></p> <p><u>Snow and ice is another aspect as the very long slope will also pose a risk. We are also concerned about de-icing potentially causing contamination.</u></p> <p><u>We are not yet reassured that design and operational aspects are adequate.</u></p>	<p><u>that, based on this safety audit, the highways design is suitable for extreme weather events. Further consideration will take place at the next stage of design.</u></p> <p>More information <u>about assessments related to weather can be seen in</u> ES Appendix 15.3: Climate Resilience Impacts and Effects, and Appendix 4.2: Major Accidents and Disasters Long List.</p>		
<p>Mitigation</p> <p>Protection from rat running on local roads</p>	<p>2.1.36</p> <p>RRE</p>	<p>Where the proposed layout is likely to result in additional traffic flow and rat running being induced on local residential and unsuitable roads, protective solutions should be integral to/integrated with the Project.</p>	<p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>An updated Wider Network Impacts Management and Monitoring Plan</p>	<p>Wider Network Impacts Management and Monitoring Plan [APP-545]</p>	<p>Matter Not Agreed</p>

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			(WNIMMP) is included in the application, providing information about the proposed traffic monitoring.		
Junctions Junction of LTC with A226 (removed)	2.1.37	Objections were raised to the insertion of this junction, which caused widespread shock and strong objections concerning traffic impacts from many sources, including from SPC. The junction was subsequently removed from plans however the principal reason was probably that engineering considerations required the tunnel to be longer and deeper, which made the junction non-viable.	The Applicant removed the A226 junction from the design in November 2017.	N/A	Matter Agreed
Tunnels Footbridge on footpath NG7 (removed)	2.1.38	Objections were raised SPC and others to the very high footbridge proposed on footpath NG7, which had very poor ambience (due to crossing a very wide chasm containing the Project) and introduced a suicide risk location. With the elongation of the tunnel (see previous point) it was not needed and was removed.	The Applicant amended the tunnel portal design by extending it a further 350m and the footbridge over the tunnel was diverted in January 2020.	N/A	Matter Agreed
Access	2.1.39	Objections were raised by SPC and others when this proposal suddenly appeared in the plans in	The parking area at Thong Lane has been proposed in consultation with the county park; this area will be created by the Project	N/A	Matter Agreed

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Informal parking area near Thong Lane north green bridge (removed)		an inappropriate location. It was subsequently removed again.	and then handed over to be run by a third party.		
Construction					
Communication and community engagement Construction information	2.1.40	<p>More info needed on liaison with constructors, lighting, working hours, nature of compounds and their access routes: Some information may come later but presently there are concerns over how liaison will occur with the community, nocturnal lighting, noise, what the compounds are for and how they are accessed.</p> <p><u>SPC Update: The point about liaison itself has been answered but information about actual impacts and their possible mitigation is still lacking as being left to post DCO processes. There are concerns that impacts during construction (and operation) are being underpredicted.</u></p>	<p>The Applicant has sought to reduce the Project's impact on the local community during its construction phase. Mitigation measures are included in the Register of Environmental Actions and Commitments (REAC) within ES Appendix 2.2; Code of Construction Practice (CoCP), to minimise the potential effects of dust, noise, and light impacts.</p> <p>Working groups such as the Community Liaison Groups and Traffic Management Forum will be key to ensuring that the community is kept informed of the Project and is therefore prepared for forthcoming changes and construction activities. As set out in the CoCP, the Applicant will work closely with stakeholders on the membership of the groups which will include representatives from the local community including Shorne Parish Council.</p> <p>The outline Traffic Management Plan for Construction (oTMPfC) details how construction traffic will be managed to mitigate effects on the local community.</p>	<p>REAC within the Code of Construction Practice [REP5-048]</p> <p>Outline Traffic Management Plan for Construction (oTMPfC) [REP5-056]</p> <p>ES Chapter 12 Noise and Vibration [APP-150]</p>	Matter Under Discussion

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Outline Traffic Management Plan for Construction [\[REP1-174\]](#)†

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			ES Chapter 12: Noise and Vibration includes noise and visual assessments from construction activities including working hours from several perspectives (e.g. noise) which has informed mitigation measures. <u>The Applicant notes the updated comments by Shorne Parish Council and will engage with them directly to provide a response. This matter remains under discussion and will be updated in a future iteration once discussions have concluded.</u>		
Worker transport Use of staff construction vehicles on residential roads	2.1.41 RRE	Concern about construction staff large vehicles using residential roads: Many roads locally are narrow and not suitable for increased traffic, staff vehicles should also access compounds through routes within the construction boundary rather than by residential roads. The concern arises that staff vehicles are larger and heavier than what residents would regard as standard private cars. <u>SPC Update: These concerns have not changed, along with construction traffic volumes and routes which keep being changed.</u>	Details of potential haul routes were supplied at Supplementary Consultation in January 2020. The Applicant is committed to a Traffic Management Plan for Construction (TMP) in the draft <u>DCO</u> , which would be developed post DCO consent by the Contractor, in line with the controls in the oTMPfC and the approved CoCP. ES Chapter 12: Noise and Vibration presents a full assessment of noise and vibration. The Applicant explained that HGVs will be banned from some routes, as outlined in the oTMPfC. The use of the strategic road network and <u>LRN</u> is required to deliver the works. Existing restrictions will be respected.	<u>oTMPfC [REP5-056]</u> <u>Draft DCO [REP5-024]</u> <u>CoCP [REP5-048]</u> ES Chapter 12: Noise and Vibration <u>[APP-150]</u> <u>FCTP [REP5-054]</u>	Matter <u>Not Agreed</u> .

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 ¶ Draft Development Consent Order (DCO) [REP2-004] ¶
 ¶ Code of Construction Practice (CoCP) [REP1-157] ¶

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			<p>Temporary offline haul routes will be constructed directly off the strategic road network where possible.</p> <p><u>The Framework Construction Travel Plan (FCTP) sets out the Project's approach to management of workforce transport to and from the construction compounds. It has not been considered appropriate to prohibit workers' use of specific routes/modes of transport, but workers will be encouraged to use certain routes to access the sites.</u></p> <p><u>In line with this overarching FCTP, Contractors would be required to develop Site-Specific Travel Plans (SSTPs) in respect of the sites for which they are responsible (either an individual construction worksite or compound and Utility Logistics Hub (ULH), or a number of construction worksites, compounds and ULHs where these are closely located with similar levels of accessibility), following the latest policy advice and best practice documents and before the relevant part of the authorised development can commence. The Applicant will work with Kent County Council, as the local highways authority, as it will be a consultee in the preparation of SSTPs. Shorne Parish Council can request representation from Kent County Council.</u></p>	<p><u>Post-event submissions for ISH4 [REP4-180]</u></p>	

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			<p><u>The FCTP and future SSTPs are designed to incorporate the flexibility needed to respond and adapt to changing conditions over the duration of the construction of the Project and will require a continuous monitoring and reviewing process. Regular employee travel surveys would be undertaken at each site, reviewing targets and indicators as necessary.</u></p> <p><u>A Travel Plan Liaison Group (TPLG) would be established, with the collective responsibility of providing high-level support to, and critical review of, travel planning across the Project. It would support efforts towards achieving greater use and increased uptake of sustainable travel, monitoring and reviewing progress, and agreeing new or amended initiatives. To ensure sufficient progress is being made, the effectiveness of this FCTP and SSTPs would be reviewed, audited and reported to National Highways by the Travel Plan Manager.</u></p> <p><u>A substantial proportion of the workforce will be local, and some of those may live in areas whereby closing certain routes to them would be an unfair disadvantage.</u></p> <p><u>In relation to construction traffic volumes, the forecast number of construction related vehicles has reduced since Statutory Consultation (2018). Furthermore, this</u></p>		

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			matter was responded to in Post-event submissions for ISH4, where additional detail on the subject can be found. Additionally, construction traffic routes have been generally consistent in the southern area of the Project		
Impacts Milton Compound and ground preparation tunnel	2.1.42	Milton Compound and ground preparation tunnel, multiple concerns: Milton Compound is within the North Kent Marshes Special Protection Area (SPA) and could negatively affect the Thames and Medway Canal bed and banks though access by very heavy vehicles and the construction of the ground preparation tunnel, assurances are needed. Concerns about injection of "grout" could cause damage, dewatering and contamination, have asked for more info including about other places where it has been used successfully. Concerns about access routes.	The Applicant is aware of the condition of the existing access road. Localised strengthening will be required along with a full condition survey before construction takes place. The road will be upgraded where necessary in order to cope with the loadings and frequency required. These proposals have been discussed with the Thames and Medway Canal Association. All works will be carefully planned, designed and executed, with full cognisance of the impacts caused and mitigated as far as feasibly possible. The canal will be reinstated as agreed with the relevant bodies, prior to works commencing. The grout tunnel remains a contingency measure, which the Applicant will not know to be necessary until detailed design.	N/A	Matter Not Agreed
Impacts Dewatering	2.1.43	Concerns about effect of any deliberate dewatering e.g. for ground preparation tunnel, the	The effects of the Project's construction activities, as well as its operation have been subject to extensive studies, undertaken in collaboration with the Environment Agency	ES Appendix 14.5 Hydrogeological Risk	Matter Under Discussion

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p>Chalk compound close to the church.</p> <p>Need clarification of all activities there.</p> <p>Also concerned about any unintended dewatering of marshes as has occurred e.g.at HS1 at Swanscombe.</p> <p><u>SPC Update: Still reviewing water issues.</u></p>	<p>and Natural England. The studies described in ES Appendix 14.5: Hydrogeological Risk Assessment demonstrate that with the embedded and secured design and mitigation in place, there will be no significant effects.</p> <p><u>The Applicant has explained and justified its position regarding Dewatering at ISH5. This is set out in Post-event submissions, including written submission of oral comments, for ISH5.</u></p>	<p>Assessment [APP-458] and APP-459]</p> <p><u>Post-event submissions, including written submission of oral comments, for ISH5</u> [REP4-181]</p>	
<p>Closures and diversions</p> <p>Bridge closures on Brewers Road and Thong Lane</p>	2.1.44	<p>The duration of bridge closures, which cause considerable disruption to local residents, should be minimised but preferably through measures other than 24h working.</p> <p>Thong Lane north bridge – should be possible to divert traffic to the side while bridge is built</p> <p>Brewers Road – minimise time, consider possibility temporary use of Park Pale bridge</p> <p>The above and Thong Lane south overbridge should not be closed simultaneously.</p> <p><u>SPC Update: Mostly agreed but the suggestion about temporary</u></p>	<p>Brewers Road and Thong Lane are never closed at the same time to ensure access across the A2 is not completely severed. This is a commitment that will be secured in the oTMPfC.</p> <p>The Applicant will work with the authority and Contractor, collectively, during the detailed design phase to optimise the solution to reduce duration as far as is reasonably practicable.</p> <p>The Applicant will continue to engage with Shorne Parish Council regarding the proposed duration of bridge closures.</p> <p><u>During the proposed closure of Brewers Road bridge, a diversion would need to be in place. Section 4.7 in the oTMPfC shows a possible diversion route which could be in place for Brewers Road.</u></p>	oTMPfC [REP5-056]	Matter Under Discussion

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[\[REP1-174\]](#)

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p><u>use of Park Pale bridge has not been picked up.</u></p> <p><u>Please see also new matter 2.1.110 which is connected to this and is about traffic through Shorne during the bridge closure.</u></p>	<p><u>The exact diversion route would be subject to engagement with the relevant authorities during the development of the TMP. The diversion route would be determined through discussions with the local highway authority nearer to the time of construction as other factors may need to be taken into account – such as other concurrent works in the nearby area.</u></p> <p><u>In terms of the use of Park Pale as an alternative, there are no existing connections onto the A2 via Park Pale, nor would it be technically feasible to make the appropriate new connections to the A2 due to the proximity of existing merges and diverges with the M2 junction 1. Park Pale is also a dead-end and there is no existing connection to Brewers Road on the south side of the A2.</u></p>		
<p>Road alteration and maintenance</p> <p>Protection of residents during construction</p>	2.1.45	<p>Tree planting in final position plus protective earth bunds should be put in place at the earliest possible date.</p> <p>Night-time working should be avoided as much as possible, maps of affected areas were not clear.</p> <p>Summer working hours are too long (06.00 to 23.00).</p>	<p>ES Chapter 12: Noise and vibration includes noise and visual assessments from construction activities. Mitigation measures have been proposed to lessen the impact of these activities to residential housing including the use of bunds and fences where deemed appropriate.</p> <p>Woodland planting will also be specified to suit its mitigation needs when required for visual screening.</p>	<p>ES Chapter 12: Noise and Vibration [APP-150]</p> <p>CoCP [REP5-048]</p> <p>oTMPFC [REP5-056]</p>	<p>Matter Not Agreed,</p>

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Outline Traffic Management Plan for Construction

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p>Haul roads are very close to residential locations.</p> <p><u>SPC Update: The first point was about tree plantings protecting residents from all forms of pollution being installed in their final position very early on in the works programme.</u></p> <p><u>The lists of extended hours and night time working referenced in REP1-157 are very long, with a large number of residents likely to be exposed to noise nuisance for weeks/months at a time, there needs to be greater consideration of their needs.</u></p> <p><u>"Key stakeholders" requires elaboration. Input is different from influence. Working hours impacts relate to all construction activities and not just construction traffic.</u></p>	<p>Night working is proposed usually where traffic conditions would not allow daytime closures due to the impact on traffic.</p> <p>Extended working hours (after 19:00) are intermittent and are required to cover certain construction activities that require more than the standard working hours to be completed. More information is provided in the CoCP.</p> <p>The oTMPfC outlines a proposed traffic forum which would discuss the appropriate traffic measure to implement and would have input from key stakeholders.</p> <p><u>Where feasible, planting would be undertaken at the earliest practicable opportunity as set out in the Register of Environmental Actions and Commitments (REAC) in the CoCP under item number LV029.</u></p> <p><u>The Applicant has sought to reduce the Project's impact on the local community during its construction phase. Measures are included in the REAC in the CoCP to minimise the potential for dust, noise, and disruption.</u></p> <p><u>Chapter 2 of the CoCP states that the Second Iterations of the Environmental Management Plans (EMP2) developed by the appointed Contractors would set out their procedures for monitoring compliance</u></p>	<p><u>REAC within the Code of Construction Practice [REP5-048]</u></p>	

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			<p><u>with the mitigation measures set out in the CoCP and the REAC relevant to the works. The EMP2s would include Contractor roles and responsibilities, together with appropriate control measures, training and briefing procedures, risk assessments, stakeholder engagement and monitoring systems to be employed. The Applicant would provide regular communication and advance notice of activities during the construction period. Paragraph 5.3.2 of the CoCP states that at least two weeks before planned works are carried out, the Contractors would distribute information sheets relating to the programmed activities. The information sheets would detail the expected disruptions and measures being taken to avoid, minimise or mitigate the adverse impacts of these works. A community liaison group (CLG) would be established in communities likely to be most impacted during construction and CLGs would be invited to attend the Traffic Management Forum (TMF); further details are set out in the CoCP paragraphs 5.2.11 to 5.2.15 and the oTMPfC paragraphs 3.3.15 to 3.3.19 provides further details relating to the TMF.</u></p> <p><u>The OTMPfC also outlines proposals for Joint Operations Forums, a TMF and CLGs which would be established to ensure that</u></p>		

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			stakeholders, including community groups are involved in relevant discussions and informed of any upcoming activities.		
Road alteration and maintenance Widening of A226	2.1.46	Concern any widening should be temporary and reversed post construction. SPC Update: We need more information as to exactly where such widening will take place so as to understand the impacts. Inclusion of the entire A226 in the order limits is worrying. We do not want the road to be made permanently more urban in residential and rural areas.	The A226 Gravesend Road has been included in the Order Limits to allow temporary road-widening if required to maintain the safety of other road users while it is used by construction traffic. Temporary traffic management measure proposals will be consulted on with the relevant highway authority as set out in the oTMPfC which refers specifically to the role of the Traffic Management Forum and traffic manager, with attendees, consultees and contributors listed. As such, the length, nature and duration of temporary traffic management measures will be discussed and relevant highway authority comments, issues considered and incorporated where reasonably practicable.	N/A	Matter Not Agreed
Construction traffic impacts Construction HGV's via Gravesend East roundabout	2.1.47	Concern about adding traffic when there are already queues back onto the A2 itself at peak times. SPC Update: This is a specific point relating to routing of HGV's to compounds. The routes that construction vehicles will take, and the volumes, are unclear as	The Applicant is committed to a Traffic Management Plan for Construction (TMP) in the DCO, which will be developed post DCO consent by the Contractor, in line with the controls in the oTMPfC and the approved CoCP. The Applicant explained that HGVs will be banned from some routes, as outlined in the oTMPfC. Use of the local and strategic road	oTMPfC [REP5-056] CoCP [REP5-048]	Matter Not Agreed

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¶ Code of Construction Practice (CoCP) [\[REP1-157\]](#)

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		these matters are to be decided post DCO, therefore we are expressing concern but cannot be reassured.	networks is required to deliver the works. Existing restrictions will be respected. Temporary offline haul routes will be constructed directly off the strategic road network where practicable.		
Closures and diversions Closure of footpaths and cycle routes, including long distance routes	2.1.48	These need to be minimised, access controlled rather than full closure, there must be safe alternative routes.	The Applicant would seek to minimise impacts on Public Rights of Way (PRoWs) during construction, as much as practicable. All works impacting footpaths/cycle paths will be coordinated with the relevant bodies, and a number of meetings have already taken place with Gravesham Borough Council as the relevant local highway authority. The oTMPfC provides a framework for dealing with such stakeholder considerations. Table 2.3 outlines the relevant stakeholders (i.e. WCH users), their requirements and how subsequent TMPs will take these requirements into account to ensure severance will be minimised. These TMPs would be developed post consent (if the Project is consented to), and in line with the controls and commitments in the oTMPfC. Impacts on PRoWs during the construction and operational phases of the Project are assessed in ES Chapter 13: Population and Human Health.	oTMPfC [REP5-056] ES Chapter 13: Population and Human Health [APP-151],	Matter Not Agreed ,

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			Further information on the impact on PRoWs can be found in the Transport Assessment (Application Document 7.9), which sets out the construction impacts on walking, cycling and horse riding.		
Impacts Chalk stockpiles	2.1.49	More information needed, concern about contaminated water efflux reaching marshes. SPC update: The concern is about water leaching from stockpiles, how it is managed and where it is treated, and risk potential spillages in severe rainfall. Also concern about duration of stockpiling.	The Applicant has provided an assessment on waste which quantifies the likely material arisings (e.g. spoil) and applies measures to divert from landfill. This is in ES Chapter 11: Material Assets and Waste. The REAC will provide detail on committed mitigation such as location of stockpiles to act as noise and visual barriers. ES Appendix 14.5: Hydrogeological Risk Assessment provides further information. The Applicant has responded to these points in Post-event submissions, including written submission of oral comments, for ISH5. As explained in this document, the previously proposed chalk stockpiles have been superseded by an enhanced earthwork approach that removes the need for post-construction removal of surplus excavated materials. The outline earthworks strategy is detailed in ES Appendix 2.2 - Code of Construction Practice Annex B - outline Materials Handling Plan.	ES Chapter 11: Material Assets and Waste [APP-149] REAC within the Code of Construction Practice [REP5-048] ES Appendix 14.5: Hydrogeological Risk Assessment [APP-458] and APP-459] Post-event submissions, including written submission of oral comments,	Matter Under Discussion

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Deleted: The Applicant will continue to engage with SPC and further discussions will take place once SPC has reviewed the application documents.

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
				for ISH5 [REP4-181] Code of Construction Practice Annex B - outline Materials Handling Plan [REP5-050]	
Closures and Diversions Traffic through Shorne during closure of Brewers Road Bridge	2.1.110 DL6	<p>(This cross-refers to 2.1.44)</p> <p>The issue raised is about considerable additional traffic through Shorne accessing Businesses north of the A2 while Brewers Road Bridge is closed.</p> <p>These are:</p> <p>Harlex Haulage – Shorne is restricted as no HGV's except for access. That is meant to be access into Shorne from outside, not access via Shorne to the Harlex depot.</p> <p>Other business use at Park Pale – There are other businesses, we are uncertain how much traffic that entails.</p> <p>Rochester and Cobham Golf Club – Members, staff and deliveries.</p>	<p>The proposed Brewers Road bridge closure is envisaged to be 19 months, per Table 4.2 of the oTMPfC. During construction, traffic measures will be consulted on with the relevant highway authority as set out in the oTMPfC. The proposed diversion route, which primarily uses the A2 to access either side of the Brewers Road closure is set out in the oTMPfC Plates 4.9 and 4.10. The exact route is subject to agreement with the local highways authority, Kent County Council.</p> <p>The commitment for consultation with stakeholders on traffic matters during construction is set out in the CoCP. As described in paragraph 5.2.5, the Applicant will continue engagement and information sharing during construction with stakeholders. Engagement and Communications Plans will be produced</p>	oTMPfC [REP5-056] CoCP [REP5-048]	Matter Under Discussion

Moved (insertion) [2]

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p><u>Shorne Woods Country Park – this is the biggest problem as it will not be physically possible or tenable to have SWCP traffic passing both ways through Shorne, especially at weekends and Bank Holidays.</u></p> <p><u>For all the above special events are also a potential problem.</u></p> <p><u>The situation needs working through in great detail and consideration of business closure/curtailment of activities during the Bridge closure period.</u></p>	<p><u>with its Contractors which will provide a detailed programme of community engagement, setting out how relevant planning authorities, businesses, communities and affected parties will be engaged with throughout the construction period.</u></p> <p><u>A community liaison group (CLG) will be established in communities likely to be most impacted during construction. The CLGs will ensure that local residents are appropriately informed and therefore prepared for forthcoming changes and construction activities. This includes traffic management measures, whereby the CLGs would be invited to attend the Traffic Management Forum (TMF). Information on the CLGs and the relationship with the TMF is set out in the CoPC in paragraphs 5.2.11 to 5.2.15.</u></p> <p><u>Traffic matters would be discussed as part of the development of the Traffic Management Plan, which will be developed following appointment of the main works contractor and in consultation with stakeholders, in line with the controls stated in the oTMPfC.</u></p> <p><u>Table 2.3 in the oTMPfC identifies different groups of stakeholders, of which businesses are included, that must be considered when designing traffic management measures,</u></p>		

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			<p>transportation plans, and diversion routes. As set in paragraph 5.3 of the oTMPfC, part of the engagement in development of the TMP, relevant authorities may highlight special events and seasonal peaks. Where it is not possible to remove traffic management, these points would be raised and discussed in the TMF to determine suitable traffic measures where reasonably practicable.</p> <p>The Applicant has engaged with the businesses named throughout development of the Project and will continue to do so to minimise any disruption during construction. The Applicant is working with Harlex Haulage on a Statement of Common Ground and will continue discussions throughout the examination process.</p>		
Operation & Maintenance					
Safety	2.1.50	Concerns about noise increase, and traffic increasing on unsuitable, residential roads: It has been claimed that some narrow residential roads have increased capacity but physical inspection (or driving through on Google maps) would show this not to be the case. Great concern about traffic increases blocking	<p>The Applicant has not claimed that any narrow roads have increased capacity.</p> <p>The Applicant is committed to a Traffic Management Plan for Construction (TMP) in the draft DCO, which would be developed post DCO consent by the Contractor, in line with the controls in the oTMPfC and the approved CoCP.</p>	<p>Draft DCO [REP5-024]</p> <p>oTMPfC [REP5-056]</p> <p>CoCP [REP5-048]</p>	Matter Not Agreed
Noise and traffic increase on residential roads					

Moved up [2]: [Code of Construction Practice](#)

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		road, as happens now when there are problems e.g. on the A2.			
Maintenance Operational staff traffic levels	2.1.52	SPC query the amount of traffic expected to the southern control centre as this route crosses a very busy multi-use public right of way. SPC Update: Information provided so "Agreed" but led to other questions arising, therefore two additional items will be added to the next iteration of the SoCG.	The tunnel will typically be controlled from the South East Regional Operating Centre, so the local tunnel control facility will be infrequently used. The South Portal Tunnel Services Building (TSB) above the tunnel portal will be used on a daily basis by Vehicle Recovery Service (VRS) and Traffic Officer personnel and by tunnel maintenance personnel as needed. VRS (one or two operatives) will recover broken-down vehicles from the road tunnels as necessary and the Traffic Officers will mostly be patrolling the road, but will use the TSB welfare facilities as required. Traffic Officers may also use the TSB access roads as a means of changing their direction of travel on the Project route. Routine tunnel maintenance is anticipated to be undertaken during overnight tunnel closures at one or other tunnel bore at six-week intervals.	N/A	Matter Agreed
Impacts Southern portal tunnel entrance activities – WCH impact	2.1.111 DL6	How will priorities be decided in routine operation? i.e. The PROW should take precedence. What will happen as regards use of the footpath when there is an emergency situation as otherwise there will be severance/long	The Applicant does not consider its maintenance activities would affect the use of the proposed WCH route. The proposed WCH route would be a Public Right of Way (PRoW) and so the existing statutory procedures in relation to closing or stopping up PRoWs would apply.	CoCP [REP5-048]	Matter Under Discussion

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p><u>diversions? Will there be control gates and diversions?</u></p> <p><u>We are concerned about conflicts and WCH path use being compromised.</u></p>	<p><u>With regard to emergency incidents during normal operations, the emergency procedures for PRoWs would be no different from the procedures in place to manage incidents across the road network including PRoWs. In the event of an incident occurring during the construction phase the appropriate response would be secured under the CoCP.</u></p>		
<p><u>Impacts</u></p> <p><u>Southern portal tunnel entrance activities – Maintenance</u></p>	<p><u>2.1.112</u></p> <p><u>DL6</u></p>	<p><u>There will be overnight tunnel maintenance every 6 weeks – we are concerned about noise nuisance to nearby residents from maintenance traffic and work.</u></p>	<p><u>By the end of the construction, commissioning and handover stage of any part of the Project, the Contractors will have developed the Handover Environmental Management Plan (EMP) i.e. the third iteration of the EMP (EMP3). EMP3 will detail maintenance and monitoring activities throughout the operational phase having regard for the specific mitigation measures identified within the REAC as well as operating procedures of National Highways, the local authority and local highway authority, this is set out in Section 6.13 of the CoCP.</u></p> <p><u>Statutory nuisance proceedings can be brought under existing statutory processes. Noise nuisance associated with maintenance and construction activities will be covered by the controls and measures described in the CoCP or any environmental management plan approved under the draft DCO.</u></p>	<p><u>CoCP [REP5-048]</u></p> <p><u>Draft DCO [REP5-024]</u></p>	<p><u>Matter Under Discussion</u></p>

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
Charging					
Local Resident Discount Scheme Discounts for local residents	2.1.53	<p>Residents have expressed that they will expect to get the same discounts/free tickets as residents of Dartford and Thurrock.</p> <p>SPC update: Thurrock residents will get free use of both routes, Gravesham residents want the same as there will be times of closure and other situations when they are forced to use the Dartford Crossing.</p> <p>It is not reasonable that, because Thurrock is a large and sprawling area, their residents get greater benefit than Dartford and Gravesham residents combined, which is the equivalent area south of the Thames. (Probably the original agreement is wrong, should have had e.g. a five mile radius limit.)</p> <p>A re-think on this matter is required as the previous agreement will be superseded by having two crossings close together. The previous agreement can be replaced.</p> <p>Therefore remains "not Agreed".</p>	<p>Schedule 12 to the draft DCO contains the powers for the Secretary of State to provide a Local Residents Discount Scheme (LRDS) on the same basis as for the Dartford Crossing (for Thurrock and Gravesham).</p> <p>SPC has confirmed they do not agree with the proposed Local Resident Discount Scheme as explained in their updated commentary, therefore the status of this has moved to Matter Not Agreed.</p>	<p>Schedule 12 to the draft DCO [REP5-024]</p> <p>▼</p> <p>Road User Charging Statement [APP-517]</p>	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
Charging regime Variable charging	2.1.54	Concern about using charge alterations to manipulate routes taken by traffic that would not otherwise use the A2/M2 and connection routes from the M20.	It is Government policy that major river crossings would normally be charged and therefore the Project is aligned with that policy. Charging would help manage demand and network performance across the existing Dartford Crossing and proposed Lower Thames Crossing. Charges at the new crossing would be equal in value to those in force at the Dartford Crossing.	N/A	Matter Not Agreed
Traffic and economics					
Modelling methodology Traffic modelling	2.1.55 RRE	Great concern that traffic data used is old, mostly from 2014-2016, SPC do not believe the results can be correct or that the statistical methodology can be valid using such old data. The general view is that the traffic data lacks credibility. Modelling only valid at regional level yet being applied to highly individual area.	The Applicant's model is built in line with the Transport Analysis Guidance (TAG) (DfT, 2022) and standards as set out in the Design Manual for Roads and Bridges (DMRB). The Applicant is content that the data used in the transport model is acceptable, and the model has been assured by the Applicant's independent assessor which has confirmed it is suitable to assess the impacts of the Project. While the model does include a range of detailed network parameters to reflect existing conditions, such a model can never reflect the conditions on every road, particularly those on the LRN.	N/A	Matter Not Agreed
Developments and uncertainty log	2.1.56 RRE	"Capping" of figures, on regional basis, also not statistically viable: The traffic figures used are not the actual product of the	The growth in the transport model is capped in line with DfT traffic forecasts. Growth in the area surrounding the Project is supplemented through developments which	N/A	Matter Not Agreed

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
Traffic Figures		<p>calculations but are modified (downwards), as they are not allowed to show predicted growth that is greater than a regional average figure.</p> <p>North-West Kent is a major growth area with great increase in housing (not all being factored into the plans, nor is the London Resort project) and therefore increased transport demands, baseline traffic is increasing greatly year on year (2.5% previously, probably more now) and the annual increase here must be at the high end of the regional range.</p> <p>If the model is correct then the output figures must be correct and should be used.</p> <p>Both the capped and uncapped figures should be published so that any underestimate is transparent and realised.</p> <p>This also impacts on the air quality figures, for which anticipated pollution will also be underestimated.</p>	<p>are under construction, that have a planning application or permission, in line with the TAG (DfT, 2022), and the overall growth in the area is constrained to the DfT traffic growth forecasts. Growth within Local Plans is not of sufficient certainty to be included explicitly in the model.</p>		

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		'DfT's own documents warn against use of traffic prediction models.			
Modelling output interpretations Traffic data presentation	2.1.57	Data presentation is very selective and often obscures negative impacts while also disguising that benefits may be lower than desired, e.g. HGV reduction at Dartford Crossing.	Data as presented at consultations has to be shared in a manner that is manageable for the majority of consultees. The Applicant has provided more detailed information to the local highway authorities (including Medway and KCC), as well as Gravesham Borough. As previously suggested, the Applicant recommends that the parish discusses the data with these authorities.	N/A	Matter Not Agreed
Modelling methodology Traffic Modelling	2.1.58	Modelling versus reality: Choice of route is often a result of satnav's and human behaviour choices of wanting to keep moving. The likely outcomes of rat running and routes that drivers will use to get from other motorways through to the Project will cause severe traffic problems throughout the areas.	The Project's Transport Model has been independently assured by the Applicant as being suitable to assess the impact of the Project. The transport model has been calibrated and validated in line with relevant DMRB and TAG guidance as set out in the Transport Model Package (Appendix B of the Combined Modelling and Appraisal report). Given the scale and nature of the model it is not possible, or required, to achieve perfect validation across the whole of the modelled network. The conditions and operation of local roads has been replicated as far as possible within the parameters of the software.	Combined Modelling and Appraisal report Appendix B: Transport Model Package [APP-520]	Matter Not Agreed

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<p>Modelling methodology</p> <p>Data collection locations and quality (supplementary surveys 2019)</p>	<p>2.1.59</p> <p>RRE</p>	<p>Turning point surveys were not representative – e.g. the survey for Forge Lane (Shorne) was carried out during non-peak hours on a single Saturday in June 2019 whereas on normal weekdays there is a lot of traffic going to and from the School and other work destinations.</p> <p>The data collection point for Brewers Road was located between the current A2 slip roads and Park Pale (leading to Harlex haulage yard and the Rochester and Cobham Golf Club) and the entrance to the Country Park. Therefore the data collected does not represent vehicle use of Brewers Road itself as it continues on through Shorne. This may in part explain the difficulty we are having in marrying up our own data with HE's and we are therefore concerned about HE's possibly incorrect data being used to predict traffic volumes, and consequent noise and pollution in residential roads accessed through this stretch of Brewers Road.</p>	<p>The data collected in 2019 was not used in the Project's transport model. Instead this has been used as part of the Applicant's assessment into the impacts on walkers, cyclists and horse riders as a result of the Project.</p>	N/A	Matter Not Agreed

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		* as at 13/07/22 agree with the purpose of the data collection not being for general traffic volumes, however we still have concerns about the quality of the data.			
Wider Network Impacts					
WNI approach Wider Network Impacts mitigation on local roads	2.1.60	Traffic increases and lack of action to protect residents: Traffic will increase throughout the area on all roads both major and minor Consequences are recognised but there are no plans included to address predictable problems from the outset, these should be integrated with project.	The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes. An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) was included in the application, providing information about the proposed traffic monitoring.	Wider Network Impacts Monitoring and Management Plan [APP-545]	Matter Not Agreed
WNI approach Wider Network Impacts mitigation Traffic increases cannot be	2.1.61	Traffic in the areas is already heavy and bad and the proposals will make it worse by drawing more traffic into the areas. Suggestions that the Project will cause reductions on small links are not credible as the Project will	The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support	Wider Network Impacts Monitoring and Management Plan [APP-545]	Matter Not Agreed

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supported by local and wider network in North-West Kent		tend to pull new traffic by different routes, so cancelling out any putative reductions.	scheme development and case making through existing funding mechanisms and processes. An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) was included in the application, providing information about the proposed traffic monitoring.		
Local WNI concerns Wider Network Impacts mitigation on A226, A227, A228 and A229	2.1.62 RRE	Traffic increases on connecting roads between the M20 to the LTC: Concern about increased traffic on the A226, A227, A228 (and A229) and local connecting roads through rat-running. The M2 and A289 immediately east of the LTC are already at capacity with frequent jams, the LTC will only make this worse. The suggested solution is to impose lower than standard motorway speed limits, which is not a helpful solution or a successful outcome as it will increase journey times for all users.	The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes. An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) was included in the application, providing information about the proposed traffic monitoring.	Wider Network Impacts Monitoring and Management Plan [APP-545]	Matter Not Agreed
Monitoring approach	2.1.63	Monitoring frequency and resolution of problems: The plan for monitoring of adverse outcomes proposes evaluation at	Monitoring would be conducted in the year before the Lower Thames Crossing opens to establish a baseline, then one and five years after completion of the Project.	Wider Network Impacts Monitoring and Management Plan [APP-545]	Matter Not Agreed

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Long term Monitoring		<p>1y and 4y, this is much too long a gap so suggest 1y, 2y, 3y and 5y. How adverse outcomes identified by monitoring are going to get resolved is not clear. There will be problems where it is not physically possible to widen the roadway, and others where the source of funding is not clear or assured.</p> <p>Funding to resolve operational problems must be assured and resolution expedited.</p> <p>However there are also problems that are predictable, and those should be included within the project.</p>	<p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) was included in the application, providing information about the proposed traffic monitoring.</p>		
Socio-economics					
<p>Community Facilities</p> <p>Loss of recreational space</p>	2.1.64	<p>The area is losing (has now lost due to recent closure) its only, and very popular, "Pay and Play" golf course, this is not being re-provided.</p>	<p>The Applicant proposes to permanently acquire the site for the new road and for landscaping. The Applicant is not proposing to replace the golf club, but instead to create a new parkland area on part of the site that would be open to the public after construction.</p> <p>The Applicant has assessed the impacts of the Project on the Southern Valley Golf Club as a community asset. This is covered by</p>	<p>ES Chapter 13: Population and Human Health [APP-151]</p>	Matter Not Agreed

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			the Environmental Impact Assessment within the DCO application.		
Traffic Effects on Business / Local Economy Increased journey times	2.1.65	Increased traffic congestion and gridlock will have negative effect on economy and journey times Plans involve making some routes much longer and more complex.	Given the widespread change in traffic patterns across the Lower Thames area it is impossible for the Applicant to provide commentary for every journey and route choice. The Ward Impact Summaries (published during Community Impacts Consultation) provided detail of the forecast changes to traffic at a ward level once the Lower Thames Crossing is open and can be used as a means to assess the likely impacts upon journeys that individuals may take. The Community Impact Report provides a summary by electoral wards that would have part of the Project (temporary and permanent) within them.	Community Impact Report (Part 1 of 4) [REP2-032]	Matter Not Agreed
Traffic Effects on Business / Local Economy Access to stations and amenities	2.1.66	There will be reduced and much more indirect access to stations, supermarkets, and other shopping locations.	The Applicant recognises that people will travel to different stations to complete their journeys, much as they would take different roads depending on their origin and destination, as well as the purpose of their trip. Given the widespread change in traffic patterns across the Lower Thames area it is impossible for the Applicant to provide commentary for every journey and route choice. The access to station information as set out in the Community Impacts Consultation refers to the immediate access	Community Impact Report (Part 1 of 4) [REP2-032]	Matter Not Agreed

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			<p>to these stations and impacts on the rail services at these stations. The Ward Impact Summaries (published during Community Impacts Consultation) provided detail of the forecast changes to traffic at a ward level once the Lower Thames Crossing is open and can be used as a means to assess the likely impacts upon journeys that individuals may take.</p> <p>The Community Impact Report provides a summary by electoral wards that would have part of the Project (temporary and permanent) within them.</p>		
EIA methodology					
<p>Assessment methodology</p> <p>Timing and extent of water surveys</p>	2.1.67	<p>Several of the water surveys and studies were only carried out in the driest months of the year, e.g. looking for streams, and the water flow tests at Chalk, this raises questions about the veracity of results obtained.</p> <p>SPC are not aware of any flow tests having been conducted between land south and north of the A226 just east of Chalk Church, which is an area of concern regarding dewatering that might be caused by excavations.</p>	<p>More information is provided in the Water Features Survey Factual Report. This includes surveys of the area of concern and was carried out in four phases of field work that spanned all times of the year.</p>	<p>ES Appendix 14.2: Water Features Survey Factual Report [APP-454] and [APP-455]</p>	Matter Not Agreed

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Assessment methodology Other Impacted land	2.1.68	The Project doesn't consider negative impact on all land that will suffer air pollution, e.g. the Parish owns "Crabbles Bottom" which is close to the M2/A289 junction but there has been no discussion about impact on our land e.g. productive orchards and meadow.	The assessment of effects from changes in air quality follows the published standard in the DMRB, LA 105 Air Quality (Highways England, 2019) . This sets out the criteria for inclusion in the assessment, listing those designated sites to be considered, distances from the affected road network, and thresholds of changes in nitrogen deposition above which sites are screened in for further assessment. If the areas listed above meet those criteria, they will have been included as part of the assessment which supports the DCO application.	N/A	Matter Not Agreed
Assessment methodology	2.1.69	Some assessments are subjective, i.e. opinion and value judgements rather than being objective assessments based on properly collected and evaluated, well evidenced hard data.	ES Chapter 4 EIA Methodology and the topic chapters of the ES fully justify the methods of assessment.	ES Chapter 4 EIA Methodology [APP-142] and the topic chapters of the ES [APP-139] to APP-154]	Matter Not Agreed
Air quality					
Assessment methodology Traffic data	2.1.70	Interdependence on correct traffic data: As discussed above, there are considerable concerns and doubts over the veracity of the traffic data. However, as the same capped data provides the input into the air quality predictions, if the traffic data is	The Applicant has produced a suite of documentation setting out how the model has been built and how it performs (see the Combined Modelling and Appraisal Report and its appendices A,B and C). This includes details of the guidance and standards the Applicant is required to use (including the TAG (DfT, 2022) and the	Combined Modelling and Appraisal Report and its appendices A, B and C [APP-518] to APP-527]	Matter Not Agreed

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		incorrectly low so will be the air quality predictions. Predictions use outputs from the traffic modelling and reconvert them into AADT rather than using actual AADT inputs.	DMRB), given the Project is to be funded by the Government. The model has been assessed by the Applicant's independent assessor and has been accepted as suitable for assessing the impact of the Project on the highway network.		
Assessment methodology Traffic data	2.1.71	Over-manipulation of data: The air quality report is prefaced by descriptions of a considerable number of ways that figures have been adjusted, usually downwards, which casts doubt on the whole exercise. In some instances data for particular major roads was individually adjusted. Predictions that air quality will improve on the A2 immediately west of the LTC (close to the major junction) are not credible as additional traffic will be pulled from the west to use the LTC cancelling out any possible reduction through westbound traffic instead taking the LTC.	The air quality assessment is undertaken in accordance with DMRB , LA 105 (Highways England, 2019) and local air quality management technical guidance (Defra, 2016). This is consistent with how local authorities assess air quality as part of their local air quality management process.	ES Chapter 5: Air Quality [APP-143]	Matter Not Agreed
Assessment methodology	2.1.72	The earliest air quality calculations that were published only related to straight, flat roads.	Detailed dispersion modelling has been undertaken in accordance with DMRB LA 105 guidance (Highways England, 2019), which states the requirements for detailed modelling. Speed band emission	ES Chapter 5: Air Quality [APP-143]	Matter Not Agreed

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Inclusion of factors for junctions, long inclines etc		Assurance is needed that the figures factor in large junctions and especially that there is a 2km long, 4% incline slope which HGV's (the heaviest polluters) will haul up from the lowest point of the tunnel. Pollution calculations could be underestimated for this reason as well.	factors have been used to determine the emission factors for each link, including slip roads and junctions. It should be noted that the air quality model has been extensively calibrated against air quality monitoring data from 260 individual sites across the study area, to ensure that the model predictions are robust.		
Assessment methodology Data presentation	2.1.73	Data presentation was only at either simple or PhD level, there needs to be an intermediate level of presentation that can be understood by non-experts with reasonable ability to understand technical information. SPC are reviewing documents in relation to this item.	To support the technical ES chapters, the ES Non-Technical Summary provides a summary of the potential impacts and proposed mitigation. The Community Impact Report help readers understand the impacts of the Project at a local community ward level.	ES Non-Technical Summary [APP-486] Community Impact Report [REP2-032] , [REP2-034] , [REP2-036] , [REP2-038]	Matter Under Discussion
Assessment methodology Sampling methodology	2.1.74	Air quality sampling was undertaken mostly using NO2 diffusion tubes but these are known to be more unreliable and give lower readings than fixed sampling stations. Therefore the calculations could be also underpredicting for this reason.	A combination of diffusion tubes and automatic analysers has been used to verify the air quality model. While it is acknowledged that diffusion tubes are not as accurate as automatic monitoring stations, it is not possible to undertake large-scale monitoring campaigns using automatic stations given both cost and infrastructure required to power the stations.	ES Chapter 5: Air Quality [APP-143]	Matter Not Agreed

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Assessment methodology Sampling points	2.1.75	Air quality sampling is not being undertaken at points where people live close to a road where traffic levels are predicted to rise as a consequence of the project, e.g. the A227 at Meopham and the A228 at Cuxton.	The assessment has been informed by air quality monitoring obtained from an extensive area, which includes areas where the highest pollutant concentrations and traffic impacts are expected as a result of the Project. There are numerous air quality monitoring sites on the A227, A228 and A229 as shown in ES Figure 5.4: Air Quality Monitoring Sites.	ES Figure 5.4: Air Quality Monitoring Sites [APP-175] to [APP-177]	Matter Not Agreed
Assessment of likely significant effects Creation of new exceedances of regulatory levels, and other deterioration in air quality	2.1.76	Unclear legality of creating new exceedances, cannot be justified or offset by reductions 10m away. If air pollution is being caused by the project then those locations should be included in the project, it is unacceptable to ignore adverse effects on human health. There are some areas which already have exceedances and will be made worse by the project but for unknown reasons have not been declared as AQMA's, this should be done and those areas included in the project and to have planned actions to reduce pollution. It has been stated that a greater number of locations will be newly subjected to bad pollution levels	The air quality assessment has been undertaken in accordance with B, LA 105 (Highways England, 2019) which presents the methodology to determine whether the impacts on air quality are considered significant. Although the assessment has concluded that there are no significant impacts, the Project has investigated whether there are any mitigation measures that could be put in place to reduce the impacts of the Project on the A228. Unfortunately, the Applicant has not been able to reduce the Project's impacts in that area. It should however be noted that the Applicant considers that the model could be overestimating the concentrations of NO ₂ at receptors along the A228. The model indicates that air quality currently exceeds AQS objectives and the Applicant has had discussions with the local authority as part of the assessment process as the area has not been designated an air quality	ES Chapter 5: Air Quality [APP-143] Health and Equalities Impact Assessment [REP3-118]	Matter Not Agreed

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		than those who may have their air quality levels improved. Greater number of residential locations will be affected badly than reduced.	management area and the Applicant is unaware of any plans to designate any AQMA on the A228. The Health and Equalities Impact Assessment provides more information specifically on air quality and human health.		
Assessment of likely significant effects Impact on local woodlands and parks	2.1.77 RRE	Pollution will spread further into the parks and Ancient Woodlands, and further up the tree trunks than is presently the case. There is little point having Country Parks which are then so contaminated that their biodiversity is compromised.	Within the Guide for Local Refinement Consultation (Chapter 5), the Applicant provided an update on how it is assessing nitrogen emitted from vehicle exhausts onto designated habitats (process called nitrogen deposition). The guide identified which designated sites e.g. ancient woodland, veteran trees, Ramsar sites, SSSIs, SPAs and SACs etc., were likely to be significantly affected by nitrogen deposition; and explained the mitigation measures considered and the proposed compensatory habitat areas, which would offset the emissions by planting new habitats and enhance existing sites. Further details on the assessment are included in ES Chapter 5: Air Quality and ES Chapter 8: Terrestrial Biodiversity.	ES Chapter 5: Air Quality [APP-143] ES Chapter 8: Terrestrial Biodiversity [APP-146]	Matter Not Agreed
Assessment methodology Air quality assessment criteria	2.1.78	Appropriate assessment criteria for rural areas with low property numbers: The significant effect criteria assessment considered number of properties, concluding no risk if very few properties were	Air quality modelling has been undertaken at worst-locations/properties where air pollutant concentrations and impacts are expected to be greatest, following the advice of DMRB LA 105 (Highways England, 2019). All properties considered to	ES Chapter 5: Air Quality [APP-143]	Matter Not Agreed

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		affected, but with low numbers of properties in rural areas, this artificially downplays the problem. E.g five properties sounds insignificant but there is a great difference in impact between 5/1000 compared to 5/5, i.e if all the properties in a particular low density area are adversely affected.	be at risk of exceedances of Air Quality Strategy objective thresholds for human health were included in the model. Paragraphs 5.2.88 to 5.3.93 of ES Chapter 5: Air Quality describe how the human receptors (such as properties) were selected.		
Assessment methodology Pollution assessment in future years after opening	2.1.79 RRE	Assessments were made only for opening year but air pollution related to traffic and traffic volumes are predicted to increase, therefore so will pollution. Arguments that more vehicles will be electric are not really quantifiable and predictable, especially for long-distance HGV's and rural residents, and these vehicles will still cause pollution of air, and noise pollution, from tyres and brakes.	The Project air quality monitoring survey has been undertaken over a period of 12 months, other than two sites where monitoring was undertaken over a period of eight months. Table 1.1 in ES Appendix 5.1: Air Quality Methodology, outlines the monitoring periods for the Project-specific monitoring sites. Where the monitoring period was less than 12 months, the data was annualised following Local Air Quality Management Technical Guidance (TG16) (Defra, 2016) , in order to ensure the concentrations were representative of long-term average concentrations. The baseline monitoring survey methodology is described in ES Appendix 5.1.	ES Appendix 5.1: Air Quality Methodology [APP-345]	Matter Not Agreed
Assessment of likely significant effects	2.1.80	Concern that particularly bad air will be pushed out of tunnel mouth, without any cleaning, and	The impact of the tunnel portals on receptors such as houses has been assessed and there is no need to add	N/A	Matter Not Agreed

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Tunnel ventilation system		impact on residential areas due to variable wind direction	filtration to reduce the effects of pollution from the tunnel.		
Cultural Heritage					
Heritage assets Impact on ancient buildings	2.1.81	Concern for St Mary's Church, Chalk which is very close to the tunnel mouth and could be affected by increased noise and vibration and through nearby dewatering.	To reduce impacts in Chalk Ward, the southern entrance of the tunnel has been moved, in line with community feedback, further south out of the ward. The tunnel was extended 600 metres after the Applicant's Options Consultation in 2016 and by an additional 350 metres after Statutory Consultation in 2018, lengthening the tunnel by a total of 950 metres and moving it away from Chalk village.	N/A	Matter Not Agreed
Archaeology Access to archaeological findings	2.1.82	Finds should be photographed and available online, exhibited locally not all taken off to a distant University archive.	The Archaeological Mitigation Strategy and Outline Written Scheme of Investigation includes provision for outreach and community engagement. This will be further developed in consultation with heritage stakeholders.	ES Appendix 6.9: Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-052]	Matter Agreed
Landscape and visual					
Plants & Woodlands Extent of damage to protected land,	2.1.83	An objective of the project is to minimise adverse impacts on (health and) the environment but the location chosen is one of maximal damage or threats to Ancient Woodland, SSSI's,	Since the Preferred Route Announcement in 2017, the Applicant reappraised its routeing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible.	Need for the Project [APP-494]	Matter Not Agreed

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and "minimisation"		SPA's, Ramsar Site, landscape areas and Shorne Woods Country Park (the most visited park in Kent). "Minimise" is a "weasel word" that should be avoided as e.g. damage that is reduced from 100% to 99.9% can be said to have been minimised if all possible reduction measures have been applied yet there is no discernible difference.	The Need for the Project sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project. Reducing the impacts of the Project on the environment is one of the Project requirements (see Need for the Project). At every step of the Project's lifecycle, consideration has been given and efforts have been made to reduce the environmental impacts, while still fulfilling the needs of the Project. The Applicant has followed the mitigation hierarchy of 'avoid, minimise, restore and compensate' to protect the environment in which it would be situated and in keeping with industry best practice.		
Impacts Light pollution increase	2.1.84	The area is presently completely dark but will be lit at night causing light pollution for nearby residents and in the landscape, particularly as the screening by trees that we requested has been removed from plans. SPC Update: "Minimise" is such a weasel word.	The Applicant clarified in paragraph 6.8.3 of the CoCP that lighting will be designed, positioned and directed to prevent or minimise light disturbance to nearby residents, ecological receptors, as well as motorists and rail and marine operations. This provision will apply particularly to sites where night working or security lighting will be required.	Code of Construction Practice (CoCP) [REP5-048]	Matter Not Agreed

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		The facts remain that a landscape that it presently very dark will not be so in future with the LTC.			
Infrastructure/Landscape Integration New structures with negative visual impact	2.1.85	75m pylon – In order to get electricity cables across the width of the LTC, an unscreened 75m pylon will be installed with great visual impact. 50msq electricity substation – having given us Chalk Park, actually only in order to reduce need for spoil removal, a very large electricity substation was announced within and nearby it which will impinge on local ambience and new views. <u>SPC Update: Unclear what screening will be effective in hiding a 75m pylon.</u> <u>We were told that the substation would be surrounded by bunds and planting so hidden from view, except of course from Chalk Park itself as has raised land. However experience of such substations is that they are highly visible and therefore a blot on the landscape.</u>	<p><u>The Applicant acknowledges that screening the proposed 75m pylon from all areas, would not be possible. However, the Applicant has proposed planting mitigation to soften the views and provide some screening from certain viewpoints.</u></p> <p><u>Screen planting can be effective when placed in foreground views close to the viewer, for example, adjoining the proposed footpath in the vicinity of Representative Viewpoint (RV) S-24. ES Appendix 7.10 provides a commentary on visual impact from RVs, for example, from RV S-27 within the Shorne, Cobham and Luddesdown ward, where it is considered that the replacement overhead line within Claylane Wood, including the taller pylon, would not notably change the existing view given the presence of existing pylons.</u></p> <p><u>ES Figure 7.19 Photomontages Winter Year 1 and Summer Year 15 (2 of 4) Viewpoint S-25 Sheet 2 of 4 and Sheet 4 of 4 show a RV of the proposed overhead line and pylons in the Shorne, Cobham and Luddesdown ward.</u></p> <p>Proposed planting, the creation of Chalk Park and the return of the wider landscape</p>	<u>Project Design Report – Part F – Structure and Architecture [APP-513]</u>	Matter Under Discussion

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			<p>to its former agricultural state would help integrate the new route into the surrounding landscape. The planting would screen views of the new substation <u>of the proposed electricity substation, which is situated on the southern side of the A226 by the South Portal and is part of the proposed permanent above ground infrastructure. Landscaped earth berms have been proposed, so the substation sits more contextually within the adjacent landscape. This is described in more detail in paragraph 4.4.17 of the Project Design Report – Part F – Structures and Architecture.</u></p> <p><u>The substation earth berms are secured at Design Principle s3.16 [REP4-146]. Furthermore para 5.12.8 of the oLEMP states:"A substation and rendezvous point have been designed off the access road, located near the vicinity of existing barns and farm buildings. The substation and rendezvous point will be integrated and screened from the wider landscape by a mixture of earthworks and woodland planting."</u></p> <p><u>The oLEMP is part of a suite of documents that capture the Project's landscape and ecology design and environmental commitments. These documents are referred to as 'control documents' and</u></p>		

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			include commitments to achieve the mitigation detailed in the ES and HRA. The control documents are legally secured through Requirements set out in Schedule 2 of the DCO.		
Mitigation Restoration of land post works – quality	2.1.86	The documents state that land will be restored to the satisfaction of the landowner, but it also needs to be to the satisfaction of the Parish and Borough Councils	The Applicant would be required to restore this land to its pre-existing state. The landowner would not need any additional consents from the local planning authority or parish council to keep the land in this state. It is therefore not appropriate for those councils to be required to approve the restoration of the land to this state. It will be restored to the landowner's reasonable satisfaction and compliant with legal requirement.	N/A	Matter Not Agreed
Plants & Woodlands Maximisation of hedges and ponds for biodiversity	2.1.87	In early plans there were plenty of hedges in the compensation land, going back to the original small field landscape of the early 1800's. These then disappeared later with instead a very open landscape proposed which provides less habitat and screening. Hedges, of mixed native species, should be maximised. Ponds are also important and should be provided where	Where possible, reinstatement of historic hedgerows has been designed into the landscape, especially where it has coincided with the boundaries of the Project. Examples are the access road from the A226 to the South Portal, which has reinstated historic land and hedgerow planting. Open mosaic habitat is a mixture of open grassland, scrub, bare ground and ponds. The proposed details for management of this area are included in the outline Landscape and Ecology Management Plan (oLEMP). The aim is to provide a diverse habitat for biodiversity.	Outline Landscape and Ecology Management Plan [REP4-140]	Matter Under Discussion

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		<p>possible and they can be permanent.</p> <p><u>SPC Update: It would be preferable for existing hedges and scrub habitat to be retained and incorporated into plans. The point is not just provision but to maximise hedge provision.</u></p>	<p>There are a number of drainage ponds associated with the Project, as well as retention ponds and infiltration basins. These form part of the Project's proposed drainage strategy, and their primary function would be to provide drainage attenuation during the operational phase of the Project. Although they would develop into a habitat of benefit to wildlife, they do not form part of the ecological mitigation for the Project. A planned maintenance system would be established to ensure that the drainage system operates effectively.</p> <p>Where waterbodies are lost, these are replaced as part of the ecological mitigation proposals and would be managed with the primary function as a biodiversity resource. New ponds are proposed along the route of the Project, some of which are integral to the mitigation strategy for great crested newts.</p> <p>South of the River Thames, habitat creation would include woodland planting, to reduce the impact for the loss of ancient and SSSI woodland during the construction of the Project, as well as areas of species-rich grassland, scrub, bare ground and ponds. These are designed to both provide new, high-quality habitats as well as connect existing areas of biodiversity value.</p>		

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			The Applicant notes the additional points raised by Shorne Parish Council and will engage with them directly to provide a response. This matter remains under discussion and will be updated in a future iteration once discussions have concluded.		
Mitigation Preservation of existing habitat	2.1.88	Residents are concerned that existing good wildlife habitat may be bulldozed when it might better be incorporated into the plans.	The Project is designed to maximise biodiversity value wherever possible. The biodiversity value generated by the Project is described in ES Chapter 8: Terrestrial Biodiversity and set out in detail in Appendix 8.21: Biodiversity Metric Calculations.	ES Chapter 8: Terrestrial Biodiversity [APP-146] ES Appendix 8.21: Biodiversity Metric Calculations [APP-417]	Matter Not Agreed
Terrestrial biodiversity					
Assessment Nitrogen deposition methodology	2.1.89	Quantitative and qualitative means are needed to identify how much compensation and mitigation and Nox offset land is needed, and to confirm it has been provided: It is unclear to us whether or not the acreage of land identified is correct. It is not just area that is important but the degree of ecological enhancement that will occur.	The methodology for identifying suitable areas for nitrogen deposition compensation is listed within the Project Air Quality Action Plan. This sets out why land was included and excluded for further consideration, and why the final sites were identified for inclusion as part of the Project application. Further details on the assessment will be provided in ES Chapter 5: Air Quality and ES Chapter 8: Terrestrial Biodiversity.	ES Appendix 5.6: Project Air Quality Action Plan [APP-350] ES Chapter 5: Air Quality [APP-143] ES Chapter 8: Terrestrial	Matter Not Agreed

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		It does not make sense to e.g. take existing grazing land, relabel it as mixed mosaic grassland and then claim it to be compensation land for the LTC. That area already existed and the ecological enhancement is small.		Biodiversity [APP-146]	
Mitigation Permanence of compensation and mitigation and Nox offset land, safeguarding against future development	2.1.90	<p>If land is taken for compensation and mitigation and Nox offset then this must be permanent. Great concerns that if management of the land is vested in local authorities (GBC and KCC) it might later be magically declared redundant and sacrificed for development, against the original principles of its acquisition.</p> <p><u>SPC Update: It wasn't NH applying to build on mitigation land that is a concern but depends on which organisation becomes in charge of the land later, and the clauses in the agreement under which they take such land on. Restrictions have to be permanent.</u></p>	<p>The Applicant will be responsible for long-term management and maintenance of environmental mitigation unless it is agreed with a third party (usually another statutory body, such as Natural England, Forestry England, etc) for them to manage at a later date.</p> <p>The Applicant will not apply for planning consent for change of use of those environmental mitigation areas as the deviation from what is secured in the <u>DCQ</u>, would be a criminal breach of control for the Applicant.</p> <p>Any future development outside the land required to construct, operate and maintain the Project would be decided by the relevant local planning authority or other relevant approval body. For more information about local authority aspirations for future development, refer to their relevant local plans.</p> <p><u>The Applicant notes the additional points raised by Shorne Parish Council and will</u></p>	N/A	Matter Under Discussion

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			engage with them directly to provide a response. This matter remains under discussion and will be updated in a future iteration once discussions have concluded.		
Marine biodiversity					
Impacts Contaminated water discharges into the Thames	2.1.91 RRE	<p>Construction phase – Plans have variously included a construction water outflow along the “Ramsar Ditch” (part of the Ramsar Site), into the North Kent Marshes SPA and out into the Thames – detail of this remains vague.</p> <p>Operational phase – Remains unclear where drainage of contaminated water from the road and tunnel will be pumped from and to, and whether there will be any discharge into the Thames, and of what quality of water. As the Thames is tidal here, contamination can hang around for significant time.</p> <p>SPC Update: It isn't “a” ditch but the “Ramsar ditch”, part of the Ramsar site – presumably included in the Ramsar Site due to hydrological importance. Concern that plans include a large settling pond to prevent</p>	<p>For the construction phase, it is proposed to discharge water to a ditch located north of Lower Higham Road. The quantity and quality of this discharge would be subject to regulation by the Environment Agency through an environmental permit. In line with current legislation, the Project would be required to meet the water quality and discharge volume conditions stipulated by the environmental permit.</p> <p>During operation it is not proposed to discharge any Project drainage directly into the Ramsar site or SPA. Operational drainage comprises a mixture of infiltration to ground and attenuated, treated discharges to surface watercourses. An assessment of the operational drainage proposals has been completed and is presented within the ES. This includes an assessment of the potential effects on surface and groundwater quality and levels.</p> <p>The tunnel will have an integrated drainage system which will ensure the collection and treatment of tunnel drainage prior to discharge into the River Thames under high</p>	N/A	Matter Under Discussion

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		<p>chalk entrainment fines so chalk will be introduced into the soil in an area of marshland.</p> <p>Plans show rectangular areas close to housing, what are they? If there are pumps or other machinery they could obstruct views and cause noise problems.</p> <p>Great Clane marsh often floods in winter and with very high tides, how will that affect/be affected by what is proposed?,</p> <p>We accept the operational drainage answers, based on what is stated in DCO documents but have ongoing concern that severe rainfall events could cause exceedance of capacity.</p>	<p>tide conditions. In line with current legislation, this discharge would be subject to an environmental permit.</p> <p>The Applicant notes the additional queries raised by Shorne Parish Council and will engage with them directly to provide a response. This matter remains under discussion and will be updated in a future iteration once discussions have concluded.</p>		
Noise and Vibration					
<p>Assessment of likely significant effects</p> <p>Future traffic noise reductions claims</p>	2.1.51	<p>Some claims of noise reduction seem not credible, especially versus loss of mature trees e.g.in the A2 central reservation, allegedly this will result from use of special road surfaces. Guarantees are needed over any improvements being maintained and of actions if shown not to be the case.</p>	<p><u>The Project design has sought to incorporate noise mitigation by means of earthwork features where practicable. The multidisciplinary iterative design process considered the potential for adverse impacts of each specific design measure having regard for noise, landscape and visual, soils, construction and engineering limitations, to identify a combined and deliverable design. The noise mitigation considered and discounted is described in</u></p>	<p><u>REAC within the Code of Construction Practice [REP5-048]</u></p>	<p>Matter <u>Not Agreed</u>,</p>

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Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p><u>SPC Update: We still consider that the noise predictions are not credible.</u></p> <p><u>No acoustic barriers are proposed south of the river, and more bunding is both possible and needed. Low noise surfaces deteriorate over time, and any repairs need to be in the same materials.</u></p>	<p><u>6.3 Environmental Statement - Appendix 12.10 - Road Traffic Noise Mitigation and Cost Benefit Analysis [APP-450]. The noise assessment and mitigation measures considered are in accordance with DMRB LA 111. Planting is not relied upon as an acoustic mitigation measure.</u></p> <p><u>Where earthwork measures are not possible, low noise road surfacing has been proposed and is secured through REAC commitment NV013 as part of the CoCP.</u></p> <p><u>With regards to surface renewal, REAC commitment NV013 was amended by the Applicant and submitted at Deadline 5 to include "Surface renewal will be undertaken using replacement road pavement on the strategic road network that has a no worse noise emission performance (Highway Authority Product Approval Scheme certification values) than that laid for the Project's opening".</u></p>		
<p>Project design and mitigation</p> <p>Mitigation measures for noise and vibration</p>	2.1.92	Discussion needed about what protective measures will be put in place, when and where to maximally protect the local residents, which should be of most importance.	<p>The Applicant has sought to reduce its impact on the local community during the construction phase. Mitigation measures are included in the REAC within the CoCP, to minimise the potential effects of dust, noise, and light impacts.</p> <p>ES Chapter 12: Noise and Vibration includes noise and visual assessments from construction activities including working hours from several perspectives (e.g. noise)</p>	<p><u>REAC within the Code of Construction Practice [REP5-048]</u></p> <p>ES Chapter 12: Noise and</p>	Matter Not Agreed

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			which has informed mitigation measures such as the use of bunds and fences where appropriate to lessen the impact of these activities to residential housing.	Vibration [APP-150]	
Project design and mitigation Design changes	2.1.93	Inexplicable changes to noise barriers, e.g. barrier at Park Pale apparently removed at suggestion of the AONB for visual impact reasons that seem minor and wrong having regard to the removal of the central reservation trees which is also occurring. This barrier is anyway needed to mutually screen headlights so must be reinstated.	There is no requirement for a noise barrier in this location as a result of the existing A2 upgrade/widening implementing a low-noise surface compared to the existing Hot Rolled Asphalt surface. By introducing a higher standard of low-noise road surfacing, the Applicant is able to remove one of the previously proposed noise barriers, which will lead to a reduction in the visual impact of the proposals in that area. This change responds to feedback received from Kent Downs AONB Unit (a statutory consultee) about the visual impact of the noise barrier near Park Pale bridge. A barrier is also not needed for visual screening because design refinements have made it possible to retain more trees between Park Pale and the A2 corridor.	N/A	Matter Not Agreed
Assessment of likely significant effects Impact on recreational routes and	2.1.94	Area and recreational facility currently valued for tranquillity will become subject to greatly increased traffic noise.	During the community impacts consultation, the Applicant presented information about the predicted impacts of the new road on visual amenity and landscape. The Applicant outlined how it has sought to reduce these impacts through good design and measures such as landscaping, planting and false cuttings to screen views	REAC within the CoCP [REP5-048] ES Chapter 12: Noise and Vibration [APP-150]	Matter Not Agreed

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Shorne Woods Country Park			of the new road and traffic. Areas used temporarily for construction would be restored to their former use. The visual impacts of the Project would be controlled through the good practice measures set out in the CoCP and REAC. ES Chapter 12: Noise and Vibration presents a full assessment of noise and vibration.		
Assessment of likely significant effects Impact on residential properties and recreational areas close to the Project	2.1.95	Noise contours were only published in July 2021 and showed that residential properties and recreational areas, including the new Chalk Park, will be badly affected by noise from the Project.	ES Chapter 12: Noise and Vibration presents a full assessment of noise and vibration.	ES Chapter 12: Noise and Vibration [APP-150]	Matter Not Agreed
Assessment of likely significant effects Data validity	2.1.96	Background noise levels quoted appear too high, aware additional readings are now being taken.	ES Chapter 12: Noise and Vibration presents a full assessment of noise and vibration.	ES Chapter 12: Noise and Vibration [APP-150]	Matter Not Agreed
Population and human health					
Public Open Space / Access to Recreation	2.1.97	A very popular golf course, the only "pay and play" type for a considerable distance, is being	The Applicant proposes to permanently acquire the site for the new road and for landscaping. The Applicant is not proposing	ES Chapter 13: Population and	Matter Not Agreed

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Loss of golf course		<p>lost. In fact it has now already closed pending sale of the land (SPC assume to NH) but given the time to start of construction it could and should have remained open.</p> <p><u>SPC Update: Closure of the golf course was linked with the project and is very much regretted locally as it was a "Pay and Play" course whereas others mentioned in NH's document as available to be used instead are private with restricted membership.</u></p> <p><u>The project does not replace what has been lost.</u></p>	<p>to replace the golf club but instead, to create a new parkland area on part of the site that would be open to the public after construction.</p> <p><u>An assessment of the Project's impact on the Southern Valley Golf Club (SVGC) is set out from paragraph G.4.12 onwards of Planning Statement Appendix G: Private Recreational Facilities [APP-502], as well as at Table 13.57 of Environmental Statement Chapter 13: Population and Human Health [APP-151].</u></p> <p><u>Paragraph 5.174 of the NPSNN states (emphasis added) 'The Secretary of State should not grant consent for development on existing...sports and recreational buildings and land... unless an assessment... has shown the... buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities'. It is the Applicant's position that the Project complies with paragraph 5.174 of the NPSNN, specifically that part of paragraph 5.174 in relation to which emphasis is placed above.</u></p>	Human Health [APP-151]	

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			<p><u>In relation to the loss of SVGC, the Applicant considers that the proposal is consistent and complies with NPSNN paragraph 5.174. This is on the basis that the benefits of the Project (including the need for the Project) outweigh the loss of SVGC, taking into account the positive proposal made by the Project for the creation of Chalk Park, which is an entirely new recreational site to be created in the same locality.</u></p> <p><u>Chalk Park is greater in area than the former SVGC site and would be functional and accessible for the wider community with connections to the wider environment as well as providing a similar setting with open views. The provision of over 35ha of new open space at Chalk Park is secured by Design Principle S3.04 [APP-516]. Paragraph G.4.16 of Planning Statement Appendix G: Private Recreational Facilities [APP-502] goes on to state: 'The mitigation of any adverse effects on the green infrastructure and recreational facility arising from the Project would be adequately provided for by means of the general provision and enhancement of the local recreational infrastructure including Chalk Park. Whilst this provision is not an identical substitution for the loss of private golf facilities, it would significantly improve the</u></p>		

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			general provision of green infrastructure and recreational facility in the same locality to counterbalance the loss of green infrastructure and recreational facility caused by the loss of Southern Valley Golf Club. This provision is secured by means of Requirement 3 (detailed design) of Schedule 2 (requirements) of the draft Development Consent Order (DCO) (Application Document 3.1) to carry out the Project in accordance with the general arrangement drawings.		
WCH / Active Travel - Design Multi-user paths safety	2.1.98	The Project wants to provide multi-user paths but horses can churn up surfaces making them impassable in wetter months, and cyclists and horses with pedestrians are a poor safety mix. Where there are multi-user routes they should have separated areas for safety reasons. SPC Update: This is of concern to a wide variety of IP's. It is not possible to say that we "agree" the WCH routes without knowing how they will be delivered structurally - too much is being left to trust in future decisions.	The proposed walking, cycling and horse riding (WCH) strategy has been developed to the latest DMRB standards and takes into account guidance within the LTN 1/20 Cycle Infrastructure Design (DfT, 2020). The proposed WCH routes will be developed at detailed design using these standards, which are outlined within the Design Principles, to determine suitable widths, separation and surface requirements. The WCH provision in the Project is set out in the Rights of Way and Access Plans and Schedule 5 of the draft DCO. Further information on the provision is set out in the Project Design Report.	Design Principles [REP4-146] Schedule 5 of the draft DCO [REP5-024] Project Design Report Part E: Design for Walkers, Cyclists and Horse Riders [APP-512] Rights of Way and Access	Matter Not Agreed

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		Note that better plans have been submitted: REP2-072 9.60 Supplementary Walking, Cycling and Horse Riding (WCH) Maps (Volume A). Please see comments in our D3 responses.	The Applicant committed in the Post-event submissions, including written submissions of oral comments for OFH2 [REP1-185] in response to the comments made by the British Horse Society, to provide a new set of maps to draw together all the various sources of information on Walking, Cycling and Horse Riding (WCH) routes into a single place. These maps provide a quick reference document, which is supplemented by other plans at a larger scale showing details of existing and proposed WCH routes. The maps also provide a better understanding of the Applicants WCH proposals, in particular the difference between existing WCH routes that the Applicant would improve and new routes that the Applicant would create. The maps also show the categories of users that the WCH routes are intended for.	Plans [REP4-048 and REP4-050]	
WCH / Active Travel - Operational Effects Connectivity of paths	2.1.99	Especially with recent expansion of land take for NOx offset, there should be creation of continuous longer distance paths that connect up communities. Some of the paths residents use are former woodsman's tracks for coppicing, although shown on maps these are not public footpaths but need to be made so, with this being enabled as part	A WCH Strategy has been developed to help improve connectivity to the existing PRoW network and repair any severance caused directly by the Project. The strategy has been developed through dialogue with stakeholders and through a series of formal consultations to identify where proposed improvements should be provided. For those wider areas not directly impacted by the Project, there are opportunities for Designated Funding from the Applicant to	Rights of Way and Access Plans [REP4-048 and REP4-050] Schedule 5 of the draft DCO [REP5-024]	Matter Not Agreed

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		of the project. SPC particularly mention Court Wood and Great Crabbles Wood in this context.	be assigned as part of a legacy package of works. The WCH provision in the Project is set out in application documents, specifically the Rights of Way and Access Plans and Schedule 5 of the draft DCO. Further information on the provision is set out in the Project Design Report.	Project Design Report Part E: Design for Walkers, Cyclists and Horse Riders [APP-512]	
Cross-river WCH and Sustainable Travel Non-motorised users enabled to use the crossing	2.1.100	There need to be bus routes that connect Kent and Essex. There have been requests for shuttle buses to assist cyclists to cross, they are expected to use the Gravesend to Tilbury ferry.	The new road creates opportunities for operators to develop new local and regional bus services, by providing new connectivity between Kent, Thurrock and Essex. Identification and development of these routes is the responsibility of the relevant operators. Local buses will not have to pay the user charge for the Lower Thames Crossing, reducing operating costs for operators. The Applicant considered options during the development of the Project to provide improved river crossings for walkers and cyclists. The options investigated include using the tunnel, upgrading the existing ferry, relocating the ferry, building a separate bridge or cable car, and providing a shuttle service through the tunnel. All of these options have been rejected for reasons including lack of technical feasibility, operational issues, lack of commercial viability, cost, environmental impacts and poor safety. Latent demand for	N/A	Matter Not Agreed

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¶ Schedule 5 of the draft DCO [REP2-004] ¶
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			walking and cycling across the River Thames at the Project crossing point is low and therefore unlikely to unlock enough trips to make the required infrastructure for a shuttle service economically viable. In addition, journey times and distances for a shuttle would be excessive because the most suitable collection and drop-off points would be at the proposed M2/A2/A122 Lower Thames Crossing junction and as far north as the proposed A13/A1089 junction. There is no provision for cyclists. The Lower Thames Crossing has been designed to provide a free-flow connection between the A2 and M25 with a maximum speed of 70mph. The Applicant is working closely with communities and local authorities on ensuring there is minimal impact on roads. The Applicant will investigate the provision of temporary/permanent alternative footpaths, bridleways and cycle paths for users where the new crossing will impact on existing routes.		
Road drainage and the water environment					
Project design and mitigation Drainage and storage proposals	2.1.101 RRE	Adequacy of proposals for drainage and storage: Drainage ponds near A226 have been amalgamated with those further south, how will water from more northerly road surfaces get to	Operational drainage discharges to ground have been subject to water quality modelling assessments that demonstrate no risks of pollution of underlying groundwater resources. A temporary discharge of rainfall runoff is also proposed and this will be	N/A	Matter Not Agreed

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		<p>there, location and landscaping of pumps, failsafes/backup.</p> <p>Ponds need capacity for heaviest incidence of rainfall, which can be torrential, not yearly average.</p> <p>Reassurance needed that capacity is suitable for the vast areas of tarmac being created, especially the 2km long slope of the LTC.</p> <p>Risk of flooding to houses on the A226 and contamination to North Kent Marshes SPA should there be overspill101</p>	<p>governed by the parameters of an Environment Agency discharge permit that will secure the required water quality standards.</p>		
<p>Project design and mitigation</p> <p>Biodiversity value of drainage ponds</p>	2.1.102	<p>It is hoped that the lower parts (least contaminated?) of the pond series might have some biodiversity/habitat qualities.</p> <p><u>SPC Update: This response does not answer the question about biodiversity value (if any) of the drainage ponds.</u></p>	<p>The drainage design incorporates Sustainable Drainage Systems (SuDS) and reduces the risk of causing flooding elsewhere by using attenuation features as presented on Figure 2.4: Environmental Masterplan. Drainage of operational areas on greenfield sites would be designed to ensure that post-development surface water runoff rates do not exceed existing rates. Where this attenuation is provided via ponds, the ponds would be designed to appear as naturalistic elements within the wider setting, with planting provided to soften edges where this is appropriate.</p>	<p><u>ES Figure 2.4: Environmental Masterplan [REP4-124, REP3-098, REP2-018, APP-162, REP4-127, REP4-129, REP2-024 to REP2-031]</u></p>	Matter Under Discussion

Deleted: Figure 2.4: Environmental Masterplan [\[APP-162, REP2-014 to REP2-031\]](#)

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			The Applicant notes the additional point raised by Shorne Parish Council and will engage with them directly to provide a response. This matter remains under discussion and will be updated in a future iteration once discussions have concluded.		
<p>Project design and mitigation</p> <p>Contamination of North Kent Marshes SPA</p>	2.1.103	<p>Proposals include using a present arable field north of the Lower Higham Road as a “temporary” drainage area during construction, this field is bounded on its west by the “Ramsar Ditch” which is part of the Ramsar Site. Assurance is needed that contaminated water cannot enter the interconnected marshes supply and drainage system.</p> <p>Note that construction plans also include using the Ramsar Ditch for drainage outflow to the Thames, detail of how this would be effected are lacking.</p> <p>SPC: We are reviewing the numerous documents related to water issues, some of which are very long and complex so more time is needed.</p>	<p>The three arable fields north of Lower Higham Road are only required for temporary use as per the land use plans. During the period of temporary use, the fields will be farmed in such a way as to ensure winter stubble remains so it can be used for birds.</p> <p>The new drainage pipes are to convey temporary surface water discharges (suitably treated by a settlement lagoon) and not required permanently. The temporary drainage outfall would only be in place during the construction period. Permanent subsurface rights are sought for the stretch of the pipe running underneath Lower Higham Road to the field to allow for the redundant pipe to be decommissioned and left in situ should its removal not be practical or economical. If the pipe is left in situ, measures would be taken to ensure it is appropriately capped.</p> <p>The discharge of runoff from the southern tunnel entrance compound would be governed by an Environment Agency Discharge Consent, the conditions of which</p>	N/A	Matter Under Discussion

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			the Contractor would be bound to comply with. This will safeguard against contamination entering the Ramsar site. Protocols to prevent pollution during extreme weather events would also be put in place and would be documented in the detailed Construction Environment Management Plan.		
Project design and mitigation Water flow from Shorne Ifield Farm to west of Chalk Church	2.1.104	SPC have asked repeatedly about this because a map issued early on included a water flow route supplying the marshes that would be transected by the works. SPC have been told that there isn't a pipe identified but we had not been thinking it was necessarily culverted. Verbal information via Gravesham Borough Council is that according to Natural England it is a mapping error but we would like more detailed, written assurances over lack of existence and what route this waterflow actually takes. <u>SPC Update: The same map is still on the KCC website, unchanged.</u> <u>We would like confirmation from the Environment Agency and Southern Water about where the</u>	The Applicant has undertaken extensive searches to find more information about this watercourse, including with the <u>landowner/land agent</u> , the EA and the Lead Local Flood Authority and no records of it have been found. No evidence of its presence has been identified during site walkovers. It is concluded that no culverted watercourse exists in the alignment shown in the early Project maps. <u>The Applicant notes the additional point raised by Shorne Parish Council and will engage with them directly to provide a response. This matter remains under discussion and will be updated in a future iteration once discussions have concluded.</u>	N/A	Matter Under Discussion

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		<p>Ifield Farm stream flows to/the route that its water takes.</p> <p>This is a permanent (i.e. all seasons) stream that might be affected adversely by the project, you ought to know this information and be able to tell us.</p> <p>Therefore this point remains under discussion.</p>			
<p>Project design and mitigation</p> <p>Effect on existing ponds/lakes</p>	2.1.105	<p>There are, or should be existing lakes and ponds locally, concern that these could have their water supply, or water retention ability, compromised.</p> <p>SPC: We are reviewing the numerous documents related to water issues, some of which are very long and complex so more time is needed.</p>	<p>The ES includes an assessment of likely significant effects on both surface and groundwater receptors, including effects on water flows, levels and quality.</p>	<p>ES Chapter 14: Road Drainage and the Water Environment [APP-152]</p>	Matter Under Discussion
<p>Project design and mitigation</p> <p>Chemical de-icing increasing contaminated run-off</p>	2.1.106	<p>The new 2km long incline up from the marshes, and the junctions and additional feeder roads, will need a significant amount of chemical de-icing in winter, this increases the amount of contaminated run-off and increase threat to the marshes. Heated road surfaces were suggested as a possible reduction measure.</p>	<p>An assessment of the potential effects of the operational drainage systems on surface and groundwater receptors has been carried out and is presented within the ES. Appropriate mitigation has been detailed within the drainage design to ensure effects are minimised.</p> <p>The Applicant notes the additional point raised by Shorne Parish Council and will engage with them directly to provide a response. This matter remains under</p>	<p>ES Chapter 14: Road Drainage and the Water Environment [APP-152]</p>	Matter Under Discussion

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		SPC Update: Minimised is a weasel word, the question was about reducing need to use chemical de-icing (including salt) in the first place. Have alternative means to using chemicals been considered, and with what outcome?	discussion and will be updated in a future iteration once discussions have concluded.		
Project design and mitigation Flood risk	2.1.109	Under item 2.1.108 we said that "Project must not increase the threat to low lying areas." SPC Update: We have concerns about possible flood risk from Great Clane Marsh to nearby houses on Lower Higham Road if additional water is to be outflowed/stored there during construction. This area floods in winter already (see flood maps). Clarification is needed about detailed use of the land (volume and characteristics of the outflow water) and any machinery/structures that will be associated (rectangular blocks on maps).	During construction it is proposed to manage surface water drainage (constituting rainfall runoff) from the southern tunnel entrance compound via systems that collect, treat and encourage infiltration to ground, and that collect, treat, store/attenuate and discharge into the River Thames via a new outfall to an Environment Agency main river that flows through Great Clane Marsh. To safeguard the receiving water environment and to ensure compliance with the requirement to prevent any detriment to off-site flood risk, rates of outflow into the marsh would be controlled and governed by the conditions of an Environment Agency Discharge Consent as secured by commitment RDWE033 (ES Appendix 2.2: CoCP. This commitment stipulates that discharge rates would be limited to greenfield rates (i.e. matching pre-development runoff rates).	REAC within the CoCP [REP5-048] Draft DCO [REP5-024]	Matter Under Discussion

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			<p><u>As a result of the stage in the design process, details of these drainage systems are not yet available for inclusion in the works plans. However, two parallel arrays of 5no. treatment lagoons with average depth of 1.5m, are envisaged, with one array on-line and one undergoing cleaning/maintenance to assist in management of the overall system. In more extreme rainstorms both arrays could be filled to provide additional storage capacity. The lagoons have been situated to take advantage of the sloping topography of the compound site in order to put in place a gravity-based drainage system, rather than a less sustainable pumped regime. Whereas presently the area proposed to accommodate the attenuation and storage systems is prone to waterlogging in winter, as it represents a low spot in the fields that are not served by a formal drainage system, this regime would change and the risk of flooding in this area would be reduced by provision of the drainage systems serving the compound.</u></p> <p><u>The Applicant also wishes to reiterate that all construction activities/temporary works would be carried out in accordance with the recommendations of a construction phase Flood Risk Assessment prepared by the Contractor (secured as REAC commitment</u></p>		

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			RDWE001) and a construction phase drainage plan will also be prepared which will demonstrate how the Contractor would manage surface water runoff across the worksites, including details of how offsite impacts would be prevented (secured as REAC commitment RDWE006 within ES Appendix 2.2: CoCP. Both of the plans/assessments secured by these commitments are to be approved, pursuant to Requirement 8 of the DCO, by the Secretary of State, following consultation with the relevant planning authorities. Information on the detailed layout of compounds and construction plant will be defined as part of the Contractor's detailed design.		
Climate					
Assessment Methodology Effect of climate change on the project	2.1.107	Documentation discussed effect of the project on climate change but not the reverse, i.e. how climate change might affect and threaten the project. SPC Update: We still have concerns about issues such as: effect of high tides and extreme rainfall (which together cause local flooding) on water outflow during construction, water storage capacity of roadways drainage during very bad storms. Also sea	To ensure the effects of climate change are minimised during operation, the Project would be designed in accordance with the standards set out in the Applicant's DMRB . Construction materials and products would be selected that are more resilient to the effects of projected future climate change. The road and any associated assets would be maintained to ensure that any deterioration and/or defects would be identified and managed as quickly as possible.	ES Appendix 15.3: Climate Resilience Impacts and Effects [APP-482]	Matter Under Discussion

Deleted: Design Manual for Roads and Bridges.

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		fogs are common in the area and we believe increasing in frequency. As stated above, need more time to review documents.	More information is provided in ES Appendix 15.3: Climate Resilience Impacts and Effects.		
Project design and mitigation Enhancement of flood defences	2.1.108	Documentation discussed this early on but it disappeared from later versions, reasons unclear. Project must not increase the threat to low lying areas.	During construction and operation, flood defences will be monitored to ensure structural stability. Remedial action will be taken if necessary to maintain the defences. The Project design includes flood resilience and this design includes amendments necessary due to predicted climate change.	N/A	Matter Agreed

Appendix A Engagement activity

The table below summarises communication in relation to progressing this SoCG. The Applicant notes that there has been [a variety of](#) informal communication, such as telephone calls between [the](#) parties to discuss project updates and various ad-hoc queries, which are not set out in the table below.

Moved down [3]: ~~Engagement activities between the Applicant and Shorne Parish Council since the DCO application was submitted on 31 October 2022~~

Deleted: ~~various~~

Deleted: ~~both~~

Moved (insertion) [3]

Table A.1 Engagement activities between the Applicant and Shorne Parish Council since the DCO application was submitted on 31 October 2022

Date	Overview of engagement activities
12 January 2023	The Applicant emailed Shorne Parish Council about the Procedural Decision which requested a PADS Tracker and suggested whether a Teams meeting would be helpful.
01 February 2023	The Applicant shared a document with signposting for Shorne Parish Council's Matters Under Discussion to find information within the DCO Application Documents and the PADS Tracker template.
03 March 2023	The Applicant emailed Shorne Parish Council as a reminder about the PADS Tracker deadline and that they would be responsible for submitting it. Shorne Parish Council shared a draft of the PADS Tracker and updated the Applicant on progress in relation to SoCG matters.
06 March 2023	The Applicant provided feedback on the PADS Tracker and queried whether signposting document was helpful or if further assistance would be required.
10 March 2023	Shorne Parish Council shared PADS Tracker with the Applicant.
23 March 2023	The Applicant contacted Shorne Parish Council with offer of teams meeting to discuss SoCGs, PADS Tracker, next steps and timescales.
11 April 2023	The Applicant emailed Shorne Parish Council with updates regarding the SoCG template, shared the latest version with queries for Shorne Parish Council and requested if updates could be made and shared by 28 April.
May to July	The Applicant and Shorne Parish Council continued to engage during this period but did not make any progress on the SoCG items specifically. SPC informed the Applicant that they were focusing on reviewing documents and attending the initial examination hearings.
10 August 2023	The Applicant met with Shorne Parish Council to discuss progress on the SoCG and PADS Tracker, and agree a strategy for moving matters in the SoCG. Next meeting planned for 17 August.
17 August 2023	The Applicant and Shorne Parish Council met to review matters and agreed further status changes. Next meeting planned for 31 August.

31 August 2023	The Applicant and Shorne Parish Council met to review outstanding matters and agreed further status changes for the next iteration of the SoCG.
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Appendix B Glossary

Term	Abbreviation	Explanation
Area of Outstanding Natural Beauty	AONB	Statutory designation intended to conserve and enhance the ecology, natural heritage and landscape value of an area of countryside.
Code of Construction Practice	CoCP	Contains control measures and standards to be implemented by the Project, including those to avoid or reduce environmental effects.
Design Manual for Roads and Bridges	DMRB	A comprehensive manual which contains requirements, advice and other published documents relating to works on motorway and all-purpose trunk roads for which one of the Overseeing Organisations (National Highways, Transport Scotland, the Welsh Government or the Department for Regional Development (Northern Ireland)) is the highway authority. For the A122 Lower Thames Crossing, the Overseeing Organisation is National Highways.
High Speed 1	HS1	A 109km high-speed railway between London and the UK end of the Channel Tunnel. The line carries international passenger traffic between the UK and continental Europe; it also carries domestic passenger traffic to and from stations in Kent and east London, as well as Berne gauge freight traffic.
Lower Thames Project		The proposed A122 Lower Thames Crossing.
Outline Traffic Management Plan for construction	oTMPfc	Outlines the approach to carrying out temporary traffic management for the safe construction of the Project and the management measures to reduce the impact on local communities.
Transport Analysis Guidance	TAG	National guidance document produced by the Department for Transport.
Ramsar	Ramsar	A wetland of international importance, designated under the Ramsar convention.
Register of Environmental Actions and Commitments	REAC	The REAC identifies the environmental commitments that would be implemented during the construction and operational phases of the Project if the Development Consent Order is granted, and forms part of the Code of Construction Practice.
Special Area of Conservation	SAC	A designation under EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, also known as the Habitats Directive.
Site of Special Scientific Interest	SSSI	A conservation designation denoting an area of particular ecological or geological importance.
Special Protection Area	SPA	A designation under the European Union Directive on the Conservation of Wild Birds.

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Term	Abbreviation	Explanation
Walkers, cyclists and horse riders	WCH	Walkers, cyclists and horse riders.
Wider Network Impacts Management and Monitoring Plan	WNIMMP	Summarises the work undertaken to date to identify and assess areas of the road network where monitoring and potential interventions may be necessary to better manage additional traffic as a result of the Project.

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