

Lower Thames Crossing 9.137 Applicant's Response to Comments made by Natural England at D5

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Lower Thames Crossing

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1 Introduction

1.1 Applicant's response to comments made by Natural England at Deadline 5

- 1.1.1 At Deadline 5 Natural England made a submission – *'Annex A Response to Applicant's Air Quality Technical Note and Without Prejudice Assessment, Annex B Response to Applicant's proposed Disapplication of the Wildlife & Countryside Act, Annex C Response to the responses to Examiner's Questions 1, Annex D Updated Statement of Common Ground, Annex E Updated Principal Areas of Disagreement, Annex F Comments on the Applicant's submissions at Deadline 4, Annex G Comments on any information requested by the ExA and received by Deadline 4 Annex H Any further information requested by the Examining Authority under Rule 17 of the EPR submitted Comments on the Applicants Submissions at Deadline 4'* [\[REP5-109\]](#).
- 1.1.2 Given the substantive new information provided by NE in their D5 submission, primarily in Annex A and also Annex C which has not been previously raised in the four years of discussion regarding AQ impacts for the Project (as evidenced by the Habitats Regulations Assessment - Screening Report and Statement to Inform an Appropriate Assessment Appendix C Evidence Plan [\[APP-487\]](#), the Statement of Common Ground between (1) National Highways and (2) Natural England v3.0 [\[REP5-038\]](#) and technical notes submitted to Examination (Responses to the Examining Authority's ExQ1 Appendix G – 11. Biodiversity (Part 1 of 6) [\[REP4-194\]](#) the Applicant has provided a response specifically to these issues in document 9.153 'Applicant's response to comments made by Natural England on HRA matters and Response to ExA ExQ2_Q11.5.1' submitted at Deadline 6 to allow input into the Report on the Implications on European Sites (RIES). The Applicant will take further time to consider these matters and provide a more detailed response at Deadline 8. The Applicant will continue the productive dialogue with NE's technical specialists to reach agreement on matters wherever possible.
- 1.1.3 The Applicant has responded to comments made in this submission (that are not HRA or AQ related) in Table 2.1 below. Responses to HRA and AQ comments are, as stated above, discussed in document 9.153 'Applicant's response to comments made by Natural England on HRA matters and Response to ExA ExQ2_Q11.5.1'.

2 Applicant's response to comments made by Natural England at Deadline 5

Table 2.1 Applicant's response to comments made by Natural England at Deadline 5 [\[REP5-109\]](#)

Section no.	Natural England's Comments	Applicant's Response
<p>Annex B: Response to Applicant's proposed to Disapply the Wildlife & Countryside Act</p> <p>Natural England's Response on the Disapplication of WCA 1981 Sections 28E and 28H in relation to SSSI:</p>	<p>Natural England's position</p> <p>Natural England's position remains as follows:</p> <p>1. In relation to potential SSSIs, SSSIs are of key environmental importance. That is reflected both in their statutory protection, and through policy protection (see e.g. NPSNN para 5.28, Draft NPSNN 5.55-5.56 and the NPPF (2023) paras 11(b)(i) fn7 and 180(b)). Natural England maintains that reliance on the DCO process (to replace the statutory and policy protections in place) is misplaced for the following reasons:-</p> <p style="margin-left: 20px;">a. This is a significant DCO considering a large variety of matters. There is not therefore a clear crystallised focus on the potential SSSI. Whilst in many places, the Applicant has considered the potential SSSI in so far as it has compensated for the loss of those existing habitats, there are some aspects of the potential SSSI that have not been given due regard at this pre consent stage. If there has been a failure to have regard then this could be further challenged by NE as a damaging operation (for example, the footpath FP200 upgrade to bridleway at Bowaters scrubland as indicated in REP 1-262, para 7.5.15).</p> <p style="margin-left: 20px;">b. The ExA will need to make a recommendation, and the Secretary of State will need to make a decision on the DCO. At those key advisory / decision making points, they cannot lawfully treat something as a SSSI if it is not an SSSI. It is important therefore to ensure that statutory provisions can apply in the future if the</p>	<p>The Applicant is confident that the Environmental Assessment has made an appropriate and proportionate ecological assessment and understands the sensitivities to be managed and, where appropriate, mitigated across the Project.</p> <p>This includes proportionate and appropriate comfort afforded to Natural England to respond to the specifics on site through the requirements as drafted in the draft DCO Schedule 2 Requirement 4 (Construction and handover environmental management plans) and Requirement 5 (Landscape and Ecology) [REP5-024].</p>

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	<p>SSSI is designated, rather than relying on the DCO which will be an inadequate substitute. Bypassing this statutory protection risks a failure to consider all of the environmental issues and a potential consequence would be a deterioration or loss in nationally valuable habitat.</p> <p>2. In relation to current SSSIs:</p> <p>a. Natural England's position is that the reasonable excuse defence exists provided s.28I is complied with. There is therefore no need to disapply the provisions.</p> <p>b. As indicated in the A417- Missing Link NSIP decision, disapplication of Section 28H is unreasonable and irrational. The statutory protection afforded to SSSIs should not be removed.</p> <p>c. We maintain that the lack of detail on operations with potential direct or indirect impacts on existing SSSIs hinders our ability to conduct a comprehensive assessment on such sites. Much crucial detail is left unresolved until after consent is granted. This lack of clarity could have significant repercussions for SSSIs and their designated features which would mean that disapplication would potentially allow owners or occupiers to consent to works on SSSI land with major, inadequately mitigated impacts. While mitigation and compensation are welcome, they must be meaningful, or they hold no value. Without a thorough assessment we cannot determine the true effect of mitigation on existing designated SSSI's.</p> <p>3. The suggestion that retaining SSSI designation would hinder the delivery of NSIPs is overstated. As in the A417 Missing Link no real evidence has been presented of any actual substantive delay caused by the retention of these provisions. To the extent the Applicant were not</p>	

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	<p>to rely on the 28P(4) defence, the potential timeframes for delay are insignificant. Section 28H(3)(b), for example, stipulates a 28-day notice period before works can proceed if Natural England has not assented. S.28E contains on specific timeframe but given that consent would simultaneously be sought under S.28H it is hard to see how radically different timescales would apply. For those reasons, we do not believe the 'necessary and expedient' test in Section 120 of the Planning Act 2008 has been satisfied, as seen in the A417 Missing Link precedent.</p> <p>Conclusion</p> <p>In conclusion, the duties under sections 28E and 28H of the WCA should not be disapplied in this DCO. These duties are crucial for environmental conservation, and in any event Section 28(l), can effectively serve the interests of all parties involved.</p>	
<p>Annex C: Q9.4.8 Road Surfacing</p>	<p>Natural England remains concerned that the use of low noise surfacing as an integral mitigation measure for impacts to tranquillity within the Kent Downs Area of Outstanding Natural Beauty is not secured for the lifetime of the Project (as raised in Paragraph 6.1.61 of our Written Representation, Examination Document REP1-262). We note the Applicant's response to Q9.4.8 (Examination Document REP4- 192) confirming that Commitment NV013 in the Register of Environmental Actions and Commitments (Examination Documents REP3-104) is to be updated at Deadline 5 with the updated wording 'intended to secure the replacement of surfaces on the strategic network so that the noise emissions performance is no worse than that laid for scheme opening'. We welcome the Applicant's approach and will provide our further advice on this matter once</p>	<p>Commitment NV013 in the Register of Environmental Actions and Commitments (Examination Documents REP3-104) is being updated at Deadline 6</p>

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	we have been able to review the amended wording to Commitment NV013.	
Annex C: Q11.1.1 Saline lagoon fauna and flora	Natural England notes the Applicant's response to this question, which correctly references our Deadline 3 submission which updated the ExA on the location of saline lagoon species errantly reported close to the Bowaters sluice. We did, however, also observe that the hydrological conditions within the ditch network appeared to be suitable for such species, and invited the Applicant to demonstrate that this was not the case through further aquatic invertebrate sampling (which we would be happy to advise further upon). The Applicant appears not to have addressed this point, and we would be grateful for their position on our request further modest and localised additional field work.	<p>The baseline survey technical appendix 6.3 Environmental Statement Appendix 8.4: Freshwater Ecology [APP-393], identified an invertebrate community that demonstrated some tolerance to brackish water environments, as would be typical of coastal drains controlled by aging water level management structures. While the Applicant acknowledges the potential for saline-tolerant species to be present at a limited number of locations within the ditch network, characteristic species typical of saline lagoons were not recorded (Natural England, 2020¹). Furthermore, while a salinity gradient may be present in some freshwater environments, the ditch network in question is unlikely to facilitate the physical characteristics of saline lagoons that support specialist saline lagoon fauna.</p> <p>Natural England (2010)² indicates a challenge in establishing characteristics for lagoons, given the stochastic variability in lagoon types. Section 5 (Natural England 2010) indicates:</p> <ul style="list-style-type: none"> • Coastal lagoons are saline water bodies with low hydrodynamics • Essential habitat of coastal saline lagoons is sublittoral • Environmental conditions are inherently extremely variable in space and time

¹ Natural England (2020) Climate Change Adaptation Manual: 29. Saline Lagoons. 2nd ed.

² Natural England (2010) Coastal Saline Lagoons and the Water Framework Directive. NECR039

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		<ul style="list-style-type: none"> • Variability impacts comparatively severe environmental stress which is responsible for the development of specialist communities • Specialist species are mainly restricted to certain stretches of the UK coastline • Recruitment to saline lagoons is unknown and therefore the community present in any given lagoon is unpredictable. <p>Furthermore, section 6.1 (Natural England, 2010) indicates that '<i>within the spirit of the [Water Framework] Directive, specific lagoons are either transitional waters or coastal waters</i>' and '<i>lagoons are not rivers</i>'. The ditch network in question is neither coastal nor transitional, but rather forms part of the riverine (freshwater-dominated environment) network that receives saline intrusion from tidally controlled sluices. This, combined with the absence of characteristic saline lagoon fauna demonstrates a lack of evidence to support the presumption that the saline-influenced freshwater ditch network would meet the physical or biological conditions associated with saline lagoons.</p> <p>It is therefore the Applicant's position that survey work carried out to date is sufficient and further survey work is not required to enable an accurate consideration of likely significant effects for macro-invertebrates north of the River Thames.</p>

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<p>Annex C: Q11.1.2 Tunnelling vibration on the marine environment</p>	<p>Natural England notes the Applicant's response to this question, and they appear to have evidenced that vibration levels will be low enough that any displacement of invertebrate fauna within the marine environment will not occur. This being the case, Natural England would be content to accept a conclusion of 'no adverse effect to site integrity' within an HRA context, for land functionally linked to the Thames Estuary & Marshes SPA / Ramsar site. We appreciate that a conclusion of 'no likely significant effect' was previously agreed and recorded within our Statement of Common Ground, however we wish to update our position with respect to this impact pathway. As per our advice relating to underwater noise, an impact pathway is plausible (there is the possibility of an effect) and hence should be screened in for LSE, but we anticipate a conclusion of 'no adverse effect on site integrity' can be reached without the need for mitigation. As for underwater noise therefore, this is a procedural risk rather than an ecological risk, for the Competent Authority (the Examining Authority) to consider.</p>	<p>The Applicant believes that, given this is highlighted by Natural England as a procedural risk, the ExA has the information it requires to complete the RIES and the competent Authority (the Secretary of State) has the information needed to complete an appropriate assessment.</p>
<p>Annex C: Q11.4.3 Breeding and Wintering Birds</p>	<p>Thames Estuary and Marshes SPA Natural England welcomes the clarity provided by the Applicant. Whilst we acknowledge the difficulty in timing restrictions where breeding and non-breeding bird species are notified features of a designated site, Natural England would expect phased working or timing of the works to periods where disturbance would be less impactful to be more fully explored. This approach applies to all works, not just the wetland creation works.</p>	<p>The Applicant will continue discussion with Natural England to explore whether the phased working or timing of works to periods where disturbance would be less impactful is feasible, and further discuss the Register of Environmental Actions and Commitments (REAC) [REP5-048] commitments already in place to manage risks to breeding and overwintering bird species.</p>

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<p>Annex C: Q11.5.2 Monitoring of Success</p>	<p>As detailed in Natural England's Written Representation (Examination Document REP1-262) and our advice during Issue Specific Hearing (as confirmed in Examination Document REP4-324), we consider a holistic approach to monitoring the establishment and functioning of all mitigation and compensation habitats (for biodiversity and landscape) should be secured. The Applicant's response to Q11.5.2 (Examination Document REP4-194) refers to the monitoring required as part of the necessary protected species licences. They state that 'the monitoring requirements committed to within the draft protected species licence applications provide a robust approach to monitoring the success of species groups'. However the Project will result in significant impacts to non-licensable species, and this is where a holistic, indicators of success approach considering the condition of habitat and how it is functioning for a broad range of species groups will provide a more robust approach to ensuring the effectiveness of the mitigation and compensation strategy. We will be pleased to continue working with the Applicant to try and agree a more holistic monitoring approach building upon good practice from other projects the Applicant has commissioned.</p>	<p>The Applicant will continue discussion with Natural England over a species monitoring strategy. It is considered that the appropriate forum for this would be the advisory group, the terms of reference for which are secured within the outline Landscape and Ecology Management Plan [REP4-140], paragraphs 4.1.13 - 4.1.15.</p>
<p>Annex C: Q11.9.7 Caveats on Mitigation: Adequacy of Security</p>	<p>Having reviewed the Applicant's response, Natural England remain concerned regarding the significant degree of ambiguity provided within the various securing mechanisms and control documents (as detailed more fully within our Written Representation, Examination Document REP1-262). We note that the Applicant states in their response to Q11.9.7 (Examination Document REP4-194) that 'In relation to the phrase "where reasonably practicable" more widely within the application, this wording is used to provide a positive</p>	<p>The Applicant notes Natural England's concern regarding the use of the term 'where reasonably practicable' and will continue to consider what refinement in wording can be developed to provide further comfort. The post-hearing submissions for ISH9 will include consideration of this matter and the Applicant is happy to discuss this further with Natural England.</p>

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	<p>requirement to incorporate measures relating to “maximising biodiversity value”...’. Natural England welcomes the Applicant’s commitment to maximising the biodiversity value through their detailed design but remain concerned that this does not provide sufficient certainty as to the minimum level of mitigation and compensatory measures for ecological and landscape impacts that will be secured and delivered. As detailed in our Deadline 4 advice (Examination Document REP4-324), following a discussion with the Applicant on the 31 August 2023 we understood that they were going to be providing greater clarity on the wording of the securing mechanisms. This important point has not been confirmed by the Applicant in their response to Q11.9.7. We would welcome clarity from the Applicant on this matter. In addition, Natural England advised there is a lack of certainty in the mitigation measures across the breadth of environmental mitigation measures as detailed within Section 3 and Annex E of our Written Representation (Examination Document REP1-262). The securing mechanisms where we remain concerned about the use of ‘where reasonably practicable’ as detailed within Annex E to our Written Representation include a significant number of landscape specific mitigation measures for impacts to the Kent Downs AONB. Given this, we advise that the Applicant’s response to Q11.9.7 does not provide sufficient certainty as to what ecological and landscape mitigation/compensation measures will be delivered and would welcome greater clarity being provided.</p>	

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<p>Q12.2.2 Nitrogen Deposition Site</p>	<p>Whilst Natural England has no specific comments to make regarding the Applicant's response to Q12.2.2 (Examination Document REP4-200), we will be pleased to provide further advice in relation to the removal of the Blue Bell Hill and Burham sites from the Order Limits once the Applicant has updated their Environmental Statement.</p>	<p>These changes were reflected in Deadline 5 Submission - 2.2 Land Plans Volume B (sheets 1 to 20) v6.0 [REP5-006] and the Applicant welcomes any further comment from NE.</p>
<p>Q12.2.3 Photomontage Reliability</p>	<p>1 Natural England welcomes the clarity provided by the Applicant in relation to the approach taken for structures within the Photomontages in the absence of detailed designs being available. We note that the Applicant refers to their approach on other projects stating 'A review of post-construction changes to visual amenity forms part of the National Highways Post-Opening Project Evaluation team assessment of where the Project was delivered in accordance with the commitments stated in the relevant Project Register of Environmental Actions and Commitments (REAC). This includes a review of photomontages, alongside review of the landscape and visual impact schedules'. Natural England welcomes confirmation that such reviews of the expected versus delivered impacts takes place for the Applicant's schemes. Given the sensitive landscape in which the Lower Thames Crossing falls, we consider it would be appropriate for the Applicant to provide examples of these reviews to give confidence in the approach being taken for this project.</p>	<p>Examples of Post-Opening Project Evaluation team assessments are listed on the National Highways website³ and Gov.uk website⁴. These include projects such as the A556 Knutsford to Bowdon Improvement and M1 Junctions 10 to 13 Hard Shoulder Running and Junction Improvements.</p>

³ National Highways (). Post Opening Project Evaluation (POPE) of major schemes. <https://nationalhighways.co.uk/our-roads/post-opening-project-evaluation-pope-of-major-schemes/>

⁴ Gov.uk (2017). Post Opening Project Evaluation (POPE) of Major Schemes. <https://www.gov.uk/government/collections/post-opening-project-evaluation-pope-of-major-schemes>

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Q12.2.6 Landscape Character	Regrading of Sensitivity and Effects Having reviewed the Applicant's Answer to Q12.2.6, given the limited changes to the Project design between the 2020 and 2022 submissions, it is still unclear why the assessments have changed significantly. We would recommend that the Applicant provides clarity on the scheme changes that have facilitated the changes in the assessment.	Further detail will be provided on this matter at Deadline 6, in response to the Examining Authority's second written question ExQ2_Q12.2.1.
Q12.3.2 Representative Viewpoints	Regrading of Sensitivity and Effects As with Q12.2.6, having reviewed the Applicant's answer to Q12.3.2, given the limited changes to the Project design between the 2020 and 2022 submissions, it is still unclear why the assessments have changed significantly. We would recommend that the Applicant provides clarity on the scheme changes that have facilitated the changes in the assessment.	Further detail will be provided on this matter at Deadline 6, in response to the Examining Authority's second written question ExQ2_Q12.3.2.
Annex F: Comments on Applicant's Submissions at Deadline 4	Natural England notes that a number of the Examination Documents have been updated to reflect the outcome of the Minor Refinement Consultation and the recently accepted changes to the project. We note that a number of documents will be updated to reflect the removal of the land at Burham and Blue Bell Hill from the Order Limits and expect this to fully reflect the consideration of landscape benefits to the Kent Downs AONB which were to be delivered alongside the NDep compensation. This is important given the requirements of the National Policy Statement for National Networks (NPSNN) which in Paragraph 5.152 details that 'There is a strong presumption against any significant road widening or the building of new roads and strategic rail freight interchanges in a National Park, the Broads and Areas of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced	<p>The environmental effects from the removal of the land at Burham and Blue Bell Hill from the Order Limits is provided in Table 4.1 of 10.4 Change Application (August 2023) [CR1-002].</p> <p>The Applicant notes that at this point in time, some updates resulting from this change have not been made to all relevant ES Chapters, Figures and Appendices, where it would not be considered necessary or proportionate. Relevant updates to ES Chapters, Figures and Appendices capturing changes and amendments arising during Examination will be prepared and submitted before the end of the Examination.</p> <p>In terms of accordance with the quoted paragraphs of the National Policy Statement for National Networks</p>

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	<p>capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty'. In addition, Paragraph 5.153 goes on to say that (our emphasis) 'Where consent is given in these areas, the Secretary of State should be satisfied that the applicant has ensured that the project will be carried out to high environmental standards and where possible includes measures to enhance other aspects of the environment. Where necessary, the Secretary of State should consider the imposition of appropriate requirements to ensure these standards are delivered'. As such, we would welcome clarity being provided by the Applicant to ensure that, despite the removal of a significant area with a dual purpose of NDep compensation and landscape enhancement, that the scheme meets the requirements of the NPSNN. Further, Natural England notes that a significant number of additional documents have been submitted with respect to the Hole Farm woodland planting project. These documents are noted and are in the public domain under planning application reference 23/00862/FUL with Brentwood Borough Council. With respect to ISH6 actions 6 and 7, and the Applicant's submission (Examination Document REP4-213 and related), Natural England does not wish to make any specific comments at this stage, other than to confirm our pre-application engagement with the Applicant regarding the Hole Farm woodland planting project, but is happy to answer any questions as may assist the ExA.</p>	<p>(NPSNN)⁵, the Applicant considers that the removal of land at Burham and Blue Bell Hill as Nitrogen Deposition Compensation sites, does not affect the Project's accordance with the NPSNN. The statement of compliance presented in respect of these paragraphs in Appendix A NPSNN Accordance Table to the Planning Statement [APP-496] remains valid. Despite the removal of these sites, the Applicant is still delivering the Project to a high environmental standard and has sought to avoid development in protected areas wherever possible. Where it has not been possible, the Applicant proposes to mitigate and compensate for those impacts (in both environmental and landscape terms) to a reasonable and proportionate degree.</p>

⁵ Department for Transport (2014). National Policy Statement for National Networks. <https://assets.publishing.service.gov.uk/media/5a7e0a40ed915d74e6223b71/npsnn-web.pdf>

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<p>Annex G: Comments on any information requested by the ExA and received by DL4 Annex A Post-hearing submissions on Agenda Item 3:</p>	<p>Annex A Post-hearing submissions on Agenda Item 3: Mitigation, Compensation and Enhancement Paragraph A.3.8 responds to Natural England's oral submission regarding the consideration of updating the Biodiversity Net Gain calculations using the current Metric 4.0. The Applicant considers it is not appropriate to do this as the number of assumptions would increase and this would require a significant amount of time to resolve. We note the Applicant's response to our oral submission regarding the consideration of updating the Biodiversity Net Gain calculations using the current Metric 4.0. The Applicant considers it is not appropriate to do this as the number of assumptions would increase and this would require a significant amount of time to resolve. Natural England's position on this remains unchanged; if a shift to 4.0 generates a disproportionate level of work, we accept the ongoing use of 3.1. We still request confirmation from the Applicant that they will rerun the figures through whatever metric is adopted (3.1 or 4.0) after detailed design. Notwithstanding our position on the metric version, it remains our view that the Applicant should take steps to achieve a 10% biodiversity net gain for the Project as a whole.</p>	<p>The Applicant set out its position on this matter in its Deadline 4 Submission - 9.86 Post-event submissions, including written submission of oral comments, for ISH6 [REP4-182], Annex A.3 Response to Action Point 3: Biodiversity Net Gain. The conclusion of this consideration is that the Applicant does not consider rerunning the calculations in Metric 4.0 to compare or supersede those presented within the application in Metric 3.1 [APP-417] as a necessary or proportionate response to the release of Metric 4.0.</p> <p>In response to Natural England's request that the Applicant will rerun the figures through whatever metric is adopted (3.1 or 4.0) after detailed design, the Applicant confirms that the metric will be rerun after the detailed design stage, and that the version used for this rerun will be Metric v3.1 to enable comparison of figures for pre- and post-detailed design. This requirement would be secured via a new REAC commitment in the Code of Construction Practice [REP5-048] to be submitted at D6.</p>

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<p>Annex G: Comments on any information requested by the ExA and received by DL4 Annex B Post-hearing submissions on Agenda Item 4: Green bridges</p>	<p>Natural England welcomes the confirmation that the Applicant will undertake monitoring of the Green Bridges as part of the European Protected Species Mitigation Licence requirements. However, as detailed within our oral submissions during Issue Specific Hearing 6 and within Section 13 of our Written Representation (Examination Document REP1-262), Natural England considers that a more holistic indicators of success approach, such as the good practice demonstrated by the Applicant on the A21 Pembury to Tonbridge scheme should be adopted. In addition to the monitoring requirements appended to protected species licences, we consider that the way all habitats created as mitigation or compensation function from an ecological and landscape perspective should be monitored. This should include monitoring of a broader suite of species groups in addition to the protected species licensing requirements. We are keen to continue working with the Applicant to ensure that an effective, holistic monitoring and management feedback programme is secured.</p>	<p>The Applicant will continue discussion with Natural England over a species monitoring strategy. It is considered that the appropriate forum for this would be the advisory group, the terms of reference for which are secured within the outline Landscape and Ecology Management Plan [REP4-140], paragraphs 4.1.13 - 4.1.15.</p>

Glossary

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

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

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

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