

Gravesham Borough Council

PHS Issue Specific Hearing 8 (19 October 2023) – (ISH8) on Construction & Operational Effects (Non traffic)

Examining Authority’s Agenda Item / Question	Response	References
Construction compound matters		
The ExA will ask questions of the Applicant relating to		
a) Construction compound matters		
<p>i. Whether the approach to waste and material management is appropriate.</p> <p><i>Polperro and traveller sites at A122</i></p>	<p>The principle is that most spoil is used on site – which includes creating Chalk Park as a land raising exercise. There is however a substantial amount of fill to imported for the false cutting south of Thong along the A122 to A289 slip road. Access to wharves along river highlighted but many have access constraints – Northfleet (Tarmac) has water/road/rail access and direct road link out to A2</p> <p>This section incorporates responses to the ExA’s action points 1 and 2, which are:</p> <p>“1. Are there circumstances in which the assessment of construction compounds has been undertaken on a generalised or generic basis, but where the proximity of specific sensitive uses/ receptors or the variable nature and location of particular construction activities give you reason for concern that any maximum adverse effects of the proposed operations at the compound have not yet been assessed?”</p> <p>“2. Further to responses to Action 1, are there circumstances relating to specific activities within specific compounds which would be subject to</p>	

	<p>specific sensitive uses/receptors where additional control measures are required? • Do these need to be locationally specific?</p> <ul style="list-style-type: none"> • In which control document are they best located?” <p>The ExA has also asked IPs to draw attention to matters on which adjudication is required on agenda item 3(a). Adjudication is required on this item.</p> <p><u>Southern Tunnel Compound: Two Travellers Sites (Horseshoe Meadow and Viewpoint Place) and residential property “Polperro” on A226 Rochester Road</u></p> <p><u>Location/phasing of works, etc</u></p> <p>These properties are shown on plate 1.3 in [AS-050] (6.3 Environmental Statement Appendices Appendix 2.1 – Construction Supporting Information). This is an indicative layout for the Southern tunnel entrance compound. GBC accepts that the design is indicative.</p> <p>GBC is not currently satisfied that adequate consideration has been given to the effects of noise and vibration on these properties during construction. So far as GBC can tell from the Applicant’s noise monitoring locations (as shown in Figure 12.5 of APP-313), there was only one baseline monitoring location where actual measurements were taken (location A-NML 5 on</p>	<p>Environmental Statement Appendices Appendix 2.1 – Construction Supporting Information [AS-050]</p> <p>Environmental Statement - Figure 12.5 - Baseline Noise Monitoring Locations [APP-313]</p>
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page 1 of Figure 12.5). That location would appear to be in the vicinity of Polperro but not close to the two traveller sites. Also, it is unclear what account has been taken in the noise assessment of the fact that the mobile homes/caravans on the traveller sites are not constructed as per a 'bricks and mortar' permanent dwelling, and that they can be expected to have lesser attenuation properties. GBC is looking for reassurance that the baseline noise monitoring is representative of conditions at the traveller sites and that the assessment has adequately reflected the different characteristics of a traveller site.

Similar concerns apply for the vibration assessment(s), with no construction vibration receptors being identified on p.1 of Figure 12.1 in the Construction Noise and Vibration Study Area in APP-309 in the vicinity of either Polperro or the traveller sites. Whilst it is noted that one of the traveller sites (Viewpoint Place) was assessed for the effects of vibration from the TBM, it is unclear from Table 6.3 in ES Appendix 12.6 (Assessment of Ground-borne Noise & Vibration at land-based receptors in APP-446) how the differences in the structures, as between mobile homes/caravans and conventional dwellings, were taken into account in the assessment.

The two traveller sites are shown as being very close to a number of what are described as "other facilities to enable construction" and "offices/welfare" and close to two large "soil

Environmental Statement - Figure 12.1 - Construction Noise and Vibration Study Area [\[APP-309\]](#)

Environmental Statement - Appendix 12.6 - Assessment of Ground-Borne Noise and Vibration at Land-Based Receptors [\[APP-446\]](#)

storage areas". Polperro is shown as being hard up against the northern soil storage area on 3 sides, with the other side fronting the A226. The soil storage is shown to be up to 15 m in height above existing ground levels in the Diagrammatic Sections of the Construction Compounds in REP5-079. The Applicant explained that the southern area is the Chalk Park landform and the northern part is storage. These properties will be affected by construction noise and visual effects during construction. At the hearing, the Applicant described the layout as in its view, a reasonable worst case, but is not necessarily the detailed layout that would be adopted. It described some fundamental principles with the layout that would have to be followed. For example, the location of the permanent works would have to remain as is and is, therefore, quite a dominant feature within the layout. Specifically, the south portal cutting excavation and the diversion of the gas main. The Council accepts that they cannot be moved.

At the hearing, the Applicant explained that the area of soil storage to the north-west is split into two, with the southern half (furthest from the properties) being the eventual Chalk Park public use formation, and the northern half designated for soil storage (presumably temporary). The Applicant said that on the illustrative plan it had shown the northern part of the storage area (nearer to the properties) as being used fully for storage because there are always circumstances when the preferential movement of material (i.e.

Applicant's Deadline 5 Submission - 9.108
Diagrammatic Sections - Construction Compounds
[\[REP5-079\]](#)

	<p>without the need to move it twice) may not be possible, for whatever reason. The Applicant said “however it would be used in that north-south preferential manner, i.e., more to the south than to the north, keeping away from the property that is the focus of the point raised by Mr Bedford.” The Council have been unable to find any commitment to this effect.</p> <p>On noise, the Applicant recognised that there will be significant effects in the evening period from construction noise at Polperro (receptor CN 30 in the Noise and Vibration Chapter of the ES [APP 150]) and that, with the application of control measures, which are detailed within the REAC, including the installation of hoarding and other measures, that would be reduced to below a significant effect. There would also be moderate effects from construction noise at the traveller sites (receptor CN 28) and that this will be addressed by various mitigation measures described in table 12.31 of that document. The Council shares the concern expressed by Thurrock Council that the mitigation measures are not specified and the effectiveness of the noise reductions achievable is not demonstrated.</p> <p>On landscape, the ES addendum concluded that there will be significant adverse effects on Polperro from the landscape perspective, during construction. The Applicant said it had sought to mitigate that through a number of landscape REAC controls, including the positioning of earth</p>	<p>Environmental Statement Chapter 12 – Noise and Vibration [APP 150]</p>
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	<p>bonding and screening for the properties, though that's not always going to reduce the significance of effects in somewhere as proximal as that</p> <p>There were exchanges at the hearing about what happens in the event that monitoring leads to the conclusion that noise mitigation measures are not working. REAC commitment NV-015 would require the contractor to investigate to confirm that works being undertaken as part of the Project are the source of the noise. If this is confirmed, then the Contractor shall immediately undertake a further review of the best practicable means (as defined under the Control of Pollution Act, 1974) employed for the activity to minimise noise and agree additional or modified mitigation with the relevant local authorities unless otherwise agreed with the SoS.</p> <p>GBC are content with that general approach, but considers that if a noise exceedance is attributable to the works, the noisy activity should be suspended until the outcome of any review process, rather than continuing during the course of the review. GBC also considers that specific commitments designed to address the issues should be entered into at the DCO stage, where possible, rather than a "cascade" arrangement whereby unknown measures are required to be implemented should problems arise, or relying entirely on section 61 CoPA and NV004 in the REAC, which simply says that where appropriate,</p>	<p>Code of Construction Practice, First iteration of Environmental Management Plan v5.0 (Clean) [REP5-048]</p>
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	<p>consents would be obtained from the relevant local authorities under Section 61. As regards the travellers' sites, GBC considers that rehousing may prove complex, particularly in an urban area, so mitigation at source is the preferred solution.</p> <p>With that in mind, GBC have prepared some suggested commitments for the REAC, and alterations to existing commitments.</p> <p>Matters for adjudication: location/phasing of works etc</p> <p>The Applicant has proposed commitment LV008 in the REAC [REP5-048], requiring earth bunds at the southern tunnel entrance compound.</p> <p>LV008 is set out below with GBC's proposed amendments.</p> <p><i>"LV008: Earth bunds of approximately 2-3m in height formed from material excavated onsite would be sited along the boundary of the compound, as material becomes available to facilitate visual screening for residential properties on Thong Lane and Rochester Road (A226) during construction. <u>The phasing of the works would be planned so that the bunds are in place before the main compound activities commence.</u>"</i></p> <p>The Applicant has proposed commitment LV010 in the REAC [REP5-048], requiring construction</p>	<p>Code of Construction Practice, First iteration of Environmental Management Plan v5.0 (Clean) [REP5-048]</p> <p>Section 61 Control of Pollution Act 1974</p> <p>Code of Construction Practice, First iteration of Environmental Management Plan v5.0 (Clean) [REP5-048]</p>
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	<p>compound facilities of greater height than 6m to be sited away from certain residential properties.</p> <p>LV010 is set out below with GBC's proposed amendments.</p> <p><i>"Construction compound facilities greater than 6m in height would be located to maximise distance from residential areas of Chalk and adjoining Thong Lane and Rochester Road (A226), together with Thamesview School, as far as reasonably practicable.</i></p> <p><u><i>All construction compound facilities would be located to maximise distance from the property known as Polperro on the Rochester Road (A226) and the Horseshoe Meadow and Viewpoint Place traveller sites, as far as reasonably practicable."</i></u></p> <p>As regards overall phasing at this location, GBC suggest the following new commitment to be included in the REAC:</p> <p><i>"Southern tunnel portal compound, phasing: Reducing the impact on residential properties on Thong Lane and Rochester Road (A226) during construction by phasing the works such that [the deposition of material commences at the [southern] part of the soil storage areas and moves generally [northwards]."</i></p> <p>As regards the haul road at the travellers' site location, the Applicant mentioned that the two</p>	<p>Code of Construction Practice, First iteration of Environmental Management Plan v5.0 (Clean) [REP5-048]</p>
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access points for the haul road to the A226 need to be close to the travellers' site, because of the need for left turns from and back onto it, which GBC accepts. Nevertheless, GBC proposes the following additional commitment to be included in the REAC to address noise and visual effects:

“Southern tunnel portal compound, haul road: In the detailed design, the route of the proposed haul road which is intended to join the Rochester Road (A226) at points immediately to the west and east of the sites' location (“the haul road”) shall be located as far from the traveller sites as is reasonably practicable possible, taking account of the need to ensure safety and having regard to the location of other sensitive receptors. So far as reasonably practicable, [acoustic][solid] barriers will be provided between the Horseshoe Meadow and Viewpoint Place traveller sites and the haul road.”

To address the possibility of noise mitigation not having the desired effect at Polperro at night time, the Council proposes the following commitment to be added to the REAC.

Night-time working is to cease in the vicinity of the property known as Polperro on the Rochester Road (A226) and the Horseshoe Place and Viewpoint traveller sites, in the event that other measures agreed under commitment NV-015 (section 61 consents) will not or do not reduce night-time

	<i>noise levels below the noise and vibration limits (as provided for in NV004).</i>	
<i>Movement of construction materials using river facilities on south bank</i>	The Council notes comments made by the Port of London Authority and others during the hearing about the lack of any commitment to use wharves on the south side of the Thames for the movement of construction materials. In principle, the Council supports greater use of the Thames if it were to lead to an improvement in conditions for its residents, for example by reducing the effects of construction traffic on roads. But the Council would not want any greater use of the south side of the Thames to result in a general increase in the amount of materials moving within its area.	
ii. The effect of noise, vibration and other disturbance on the local community	<p>Noise: adequacy of control measures</p> <p>In Chapter 12 of its local impact report, the Council expressed concerns about what happens if noise levels are exceeded. As they stand, the commitments in the REAC are too broad and lack teeth on what happens if there is an exceedance.</p> <p>REAC commitment NV-015 would require the contractor to investigate to confirm that works being undertaken as part of the Project are the source of the noise. If this is confirmed, then the Contactor shall immediately undertake a further review of the best practicable means (BPM) (as defined under the Control of Pollution Act, 1974) employed for the activity to minimise noise and agree additional or modified mitigation with the</p>	<p>Gravesham Borough Council Local Impact Report [REP1-228]</p> <p>Code of Construction Practice, First iteration of Environmental Management Plan v5.0 (Clean) [REP5-048]</p> <p>Section 72 Control of Pollution Act 1974</p>

	<p>relevant local authorities unless otherwise agreed with the SoS.</p> <p>That doesn't actually provide any respite from the noisy activity which is found to be the exceedance, certainly not in the short-term. And there is no timescale for how long that noisy activity can continue; there is simply an obligation to investigate to see whether something can be done and, if so, to consider putting that forward.</p> <p>The Council wish to see a tighter series of controls for policing exceedance of any noise or vibration impacts.</p> <p>For adjudication</p> <p>The Council suggests the following amendments to REAC NV-015. These amendments are intended to ensure that the procedures set out by the Applicant are followed as swiftly as possible once an exceedance is found to have occurred.</p> <p>NV015: In the event that noise and vibration monitoring (as provided for in NV009) identifies that noise and vibration limits (as provided for in NV004) have been exceeded, the Contractors shall, at the earliest reasonably practicable opportunity, investigate to confirm that works being undertaken as part of the Project are the source of the noise. If this is confirmed, then the Contactor shall immediately <u>(a) notify the relevant local authorities (b) cease the activity in</u></p>	<p>Code of Construction Practice, First iteration of Environmental Management Plan v5.0 (Clean) [REP5-048]</p>
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	<p><u>question pending the outcome of the further review described below and (c) undertake a further review of the best practicable means (as defined under the Control of Pollution Act, 1974) employed for the activity to minimise noise and use best endeavours to promptly agree additional or modified mitigation with the relevant local authorities and implement all such mitigation prior to the resumption of the activity in question unless otherwise agreed with the SoS.</u></p> <p>A further issue raised in this section was the use by the Applicant of its own policies as regards noise insulation and temporary rehousing. It is not clear how they are binding on NH in the context of the DCO and what happens if those policies change. The Council has addressed this issue and in its response to EXQ2 number Q9.1.1.</p> <p>Working hours</p> <p>Working hours are set out in Table 2.1 in the CoCP [REP5-048].</p> <p>Extended working hours for Earthworks are 07:00 to 22:00 Monday to Saturday (March to October inclusive, only). But these extended working hours will not apply to any earthwork activities within 300m of sensitive receptors which give rise to greater levels of noise than the levels recorded during pre-construction monitoring.</p>	<p>Code of Construction Practice, First iteration of Environmental Management Plan v5.0 (Clean) [REP5-048]</p>
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	<p>24 hour working is allowed for a range of activities set out in Tables 6.2 (Kent roads) and 6.4 (utilities) in the CoCP. This is a concern for the council in relation to occupiers of residential premises which are likely to be affected, particularly properties along the urban section of Thong Lane.</p> <p>For adjudication</p> <p>The Council considers that similar restrictions should be placed on night-time working as apply to evening earthworks working as regards sensitive receptors, and therefore propose the following restriction should be added in relation to the entry in Table 2.1 of the CoCP called "Extended working hours for specified activities in Table 6.2, Table 6.3 and Table 6.4 00:00 to 24:00 Monday to Sunday".</p> <p><i>Extended working hours for specified activities in Table 6.2, Table 6.3 and Table 6.4 are from 00:00 to 24:00 Monday to Sunday. But these extended working hours will not apply to any activities within 300m of sensitive receptors which give rise to greater levels of noise than the levels recorded during pre-construction monitoring.</i></p>	
<p>iii. Whether suitable regard has been given to the impact of the construction process and duration on Traveler sites, noting the propensity for grater noise exposure on those sites.</p>	<p>See above comments in relation to Key issue of sites on the A226. See also separate plan below covering Horseshoe Meadow (3 households) and Viewpoint Place (3 households). Note there are also 5 households at O'dell Tan on Lower Higham Road who may be affected by the ground</p>	

	<p>stabilisation tunnel work site. (NB adult children count as separate households even if living de facto as one household).</p> <p>The Council echoed the points made by Thurrock Council that so far as the physical properties of most caravans or mobile homes are concerned, they have less noise attenuation properties than conventional dwellings.</p> <p>Action for Applicant if not addressed by it at D6, and thereafter possible adjudication</p> <p>The Council seeks reassurance from the Applicant that its noise assessment properly reflected the physical nature of the dwellings at the travellers' sites in the noise readings, predictions and assessment of effects that have been presented. The Applicant said it would produce a table to show that its noise assessment reveals that at the travellers' site, noise impacts during construction, subject to BPM, will be below SOAEL. The Applicant also said it was also happy to provide a note which summarises the robustness of assuming a 10dB reduction, attributable to best practicable means. It is not clear whether such a document will meet the concern about the physical nature of the premises but the Council will consider it.</p>	
<p>iv. The effect of the proposed onsite accommodation and related management of potential socio-economic impacts.</p>	<p>There are no proposals south of the river for the provision of any onsite accommodation, and the applicant's proposals for those of its workforce, who will be working onsite south of the river, is</p>	

either that they are expected to be locally sourced, or, if they are not locally sourced, they are expected to make provision through the local private rental sector operating in market terms.

The rationale, as GBC understand it, for that are the assumptions that the applicant has made in relation to the derivation of its workforce.

The Council, as a housing authority, faces significant problems in placing people into the private rented sector in discharge of its housing duties, and has a number of related concerns.

The first is that if the applicant's assumptions – some of which rely on the use of professional judgement - are incorrect and there is a greater draw into the area of non-local workers. Recruitment decisions are likely to be made for the most part by the contractors in due course seeking to get the best person for the job as opposed to the person who lives closest to the job.

If the judgments which have been made proved to be incorrect, the Council does not think there are adequate provisions currently made in default. It would result in additional pressure on the local housing market, either by (a) the workforce absorbing demand that would otherwise be available to the Council in its housing function to place persons to whom it owes a housing duty, or (b) by pushing up rents in the private rental sector, resulting in a higher cost burden falling on

	<p>Gravesham Borough in discharging its housing obligations. The Council already has a disproportionately high housing cost burden.</p> <p>These are entirely reasonably foreseeable consequences of the project and the Council considers that it is incumbent on the applicant to provide some form of mitigation that may need to be dealt with by financial contributions secured through a section 106 agreement. The Council raised this matter in its section 106 asks document [AS-070] (see page 24) and the Applicant have not been willing to include any provision for housing in its draft section 106 agreement.</p> <p>Further factual background</p> <p>See the Council's Local Impact Report REP1-228 pages 112-118 and paragraphs 13.112-133.</p> <p>As an update, Gravesham currently has over 220 households in temporary accommodation (as at 12 October 2023) of which 64% are in expensive nightly paid accommodation by various providers.</p> <p>In reviewing the local housing rental market, it become apparent that affordability in the private sector is most acute for those households seeking 1 and 2 bedroom accommodation, as the local housing allowance is insufficient to cover the expected monthly rent.</p>	<p>Gravesham Borough Council section 106 asks document [AS-070]</p>
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	<p>In addition to a challenging private rented sector locally, there are various local factors that have impacted the Councils temporary accommodation position as outlined below with additional pressures created by statutory duties and some recent announcements by Kent County Council which include matters relating to:</p> <ul style="list-style-type: none"> • The Domestic Abuse Act 2021 • Relationship breakdowns • Private Sector Evictions • Cost of living • Closure of Supported accommodation <p>Matter for adjudication</p> <p>The Council's primary ask of the Applicant in relation to housing is for funding, which could be secured through a section 106 agreement. In the absence of any offer from the Applicant along those lines, the Council has (for the purposes of seeking an adjudication on the matter) drafted a requirement for consideration by the ExA and Applicant. The draft requirement is set out in a separate document submitted at D6 - the Council's response to the Applicant's D5 comments on IP D4 DCO comments.</p>	
b) Restoration		
<p>i. The intentions in respect of the construction compound sites post construction and the plan for restoration.</p>	<p>The issue of the car park at Thong Lane is addressed in detail in the Council's response to EXQ2 Question 11.4.1.</p>	

	<p>In brief, the Council considers that the construction compound's permanent retention as a car park is not justified, even as proposed to be repurposed. It has concerns about buildings at this location and (as parking enforcement authority) the impact on parking in nearby roads.</p> <p>Question 11.4.1 makes specific reference to the impact of the car park on the AONB. The Council is also concerned about the green belt (on which there is a further more general question).</p>	
Construction impacts		
The ExA will ask questions of the Applicant relating to:		
a) Gammonfields Traveller site		
i. What progress has been made on the relocation of the Gammonfields Traveller site?	n/a	
ii. Is the applicant intending to submit a planning application to the local planning authority or is it relying upon the DCO for the change of use approval of the land for the new site?	n/a	
b) Effect on visitor attractions		
i. Whether the scale of the potential lost revenue to visitor attractions, such as Shorne Country Park, Thames Chase Forest Centre, Cascades Leisure Centre, etc, as well as potential lost revenue to businesses has been sufficiently represented in the Applicant's submission.	<p>Shorne Woods Country Park The Council is supportive of the case put forward by Kent CC in relation to the continuing viability of Shorne Woods Country Park which is a key issue for them, especially during Brewers Road closure, but also long term. Revenue from the park supports other parks so it has real budgetary implications for them.</p> <p>Cascades Leisure Centre</p>	

	<p>See separate points made in relation to compulsory acquisition in the Council's written post-hearing submissions on CAH3.</p> <p>The ExA has listed an action point for the Council on this issue:</p> <p>“Gravesham Borough Council to set out suggested amendments to the REAC in respect of Cascades Leisure Centre (D6) and Applicant to provide a response (D7)”</p> <p>The Cascades Leisure Centre is a recreational facility owned and managed by Gravesham Borough Council. It is approached from Thong Lane, and in particular from the south side of Thong Lane.</p> <p>In the last year for which the Council has full records (2022), the leisure centre received approximately 240,000 visits, and it had a turnover of the order of £1.8 million. The Council would be concerned about losing income, but more particularly from a planning point of view, about losing an important recreational resource in the borough, or at least it being perceived that it's not a resource that can be easily accessed from some parts of the borough.</p> <p>There are plans for the redevelopment of the centre, and ideally, the Council would like that to happen before construction of LTC begins.</p>	
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	<p>Reference is made to the Outline Traffic Management Plan for Construction. [REP5-056], plate 4.5.</p> <p>The plan shows in purple, a pair of parallel haul-roads, which cross Thong Lane, and then the parallel series of haul-roads becomes one haul-road, which then goes down through the workings to where the Lower Thames Crossing would be in cutting.</p> <p>The first point is the implications of the closure of Brewers Lane on access to Thong Lane from the south up towards the Cascades Leisure Centre, and then the second is the impact of the use of the haul roads.</p> <p>Section 7 of the Outline Materials Handling Plan [REP5-050] shows that construction of the section of the Lower Thames Crossing between the A2 and Thong Lane requires a substantial amount of deep cuttings and construction of embankments, resulting (see paragraph 7.4.6) in the order of some 2 million cubic metres of excavated material to be handled and placed. Of that 2 million cubic metres of material, some 600,000 cubic metres is to come from the south portal construction site works, and that is to be moved via the haul-road mentioned above, from the north to the south area where it will then be required. All of that has to cross Thong Lane at the crossing point mentioned above. The Council understands that</p>	<p>Outline Traffic Management Plan for Construction [REP5-056]</p> <p>Outline Materials Handling Plan [REP5-050]</p>
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	<p>translates to 35,000 HGV movements crossing over Thong Lane.</p> <p>The Council is concerned about this level of HGV movements causing difficulty in accessing Cascades, and the perception that residents may have of access being effectively severed from Thong Lane south.</p> <p>According to the project description and the phasing for the works in that area (either diagram 2.12 or 2.13) – these works might take between four to five 19 years to complete. Assuming a completely even profile, then on a daily basis it may well be that there wouldn't be many crossing movements per day. But if there are peaks and troughs in that, then that would be a circumstance which would give the Council concerns about residents' perception about access.</p> <p>Solutions</p> <p>The Council understands that the applicant does not have the granularity of information to be able to provide full detail as to how that pattern of movements will occur. The Council suggests the possibility of a control that puts a daily cap on the number of movements which would remove that perception.</p> <p>In response to this suggestion, the Applicant referred to paragraph 4.5.8 in the Outline Traffic Management Plan for Construction [REP5-057]</p>	<p>Environmental Statement - Chapter 2 - Project Description [APP-140]</p> <p>Outline Traffic Management Plan for Construction [REP5-057]</p>
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	<p>Paragraph 4.5.8 says:</p> <p>“Where traffic signals or similar would be required to facilitate construction movements such as access to compounds and construction vehicle crossing points, they would be locally controlled to ensure that the LRN has priority in terms of traffic movements. Additionally, when not required operationally the traffic signals would be turned off.”</p> <p>The Council is content with the second sentence of 4.5.8 but would like to see more detail in the paragraph about how LRN priority is secured. The Council notes that the paragraph is under the heading “Safety measures” rather than “Local traffic measures” so is concerned that perceptions about delays may not be taken into account when considering phasing.</p> <p>In the eventuality that no further commitments or amendments to control documents are proposed by the Applicant, the Council suggests the following points to be worked up as amendments to the Outline Traffic Management Plan for Construction:</p> <ul style="list-style-type: none">• <i>At the location of the junction of Thong Lane and the haul road [add more precise description], the way in which the proposed traffic lights would be locally controlled under paragraph 4.5.8 to</i>	
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	<p><i>ensure that the LRN has priority in terms of traffic movements, would be by the lights defaulting to allow movements along Thong Lane. The frequency of construction traffic crossings shall be restricted appropriately (the details to be discussed with the LTF) to ensure that disruption on Thong Lane is kept to a minimum. The contractor will use reasonable endeavours to ensure that the movement of construction vehicles is phased so as to minimise the number of occasions that construction vehicles require to cross Thong Lane using the haul route.</i></p> <ul style="list-style-type: none"><i>• Construction traffic monitoring (including baseline monitoring) will be carried out at the location of the junction of Thong Lane and the haul road [add more precise description] in accordance with paragraphs 2.4.8 et seq of the OTMPfC</i><i>• If despite the local control of traffic lights described under paragraph 4.5.8, the monitoring shows that disruption on Thong Lane is not being kept to a minimum then the contractor will support an intervention consisting of an appropriate cap on the number of HGV crossings, during appropriate periods (see paragraph 2.4.23 of the OTMPfC).</i>	
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Operational Impacts		
The ExA will ask questions of the Applicant relating to:		
a) Noise		
i. Whether the assessment of operational noise impacts is adequate.	<p>In summary, in its Local Impact Report [REP1-228] chapter 12, the Council set out some concerns about the adequacy of the controls for operational noise assessment with the project. The Council acknowledges that at least one of those concerns has been addressed through NV013 in the REAC.</p> <ul style="list-style-type: none"> • As a minimum, it is expected that continuous vibration monitoring will be conducted at Kartar House, Watling Street (CV2) during piling of retaining wall RWN0000102 (Plate 3.1 in APP-444). • Vibration monitoring should also be undertaken at representative locations where properties are within 65m of proposed percussive piling or 45m of vibratory piling. 12.44. • Where the ES (Tables 12.32 in APP-150) identifies a potential exceedance of the respective construction noise threshold, it is expected that a Section 61 application will be made detailing more accurate noise predictions for the activities proposed and the measures proposed to minimise noise impacts in accordance with Best Practicable Means (REAC Ref. NV002 in REP5-048). 	<p>GBC Local Impact Report [REP1-228]</p> <p>Code of Construction Practice, First iteration of Environmental Management Plan v5.0 (Clean) [REP5-048]</p> <p>Environmental Statement - Appendix 12.4 - Construction Noise and Vibration Assessment [APP-444]</p> <p>Environmental Statement - Chapter 12 - Noise and Vibration [APP-150]</p>

	<ul style="list-style-type: none"> • Appropriate noise monitoring will be agreed with the Council prior to works commencing. • Whilst the noise reduction performance of certified low noise surface products might be achieved when newly laid, evidence indicates that these surfaces tend to be have less durability and greater deterioration in acoustic performance over time . It is therefore requested that acoustic barriers (Options 1 and 2 in Plate 4.1 of Appendix 12.10 (APP-450)) are reconsidered, based on re-assessment of the Value for Money appraisal assuming the average acoustic performance of a thin road surface over its lifetime. • The Noise Insulation Regulations Assessment (APP-447) should also be reviewed based on the updated road traffic noise predictions. • The Council would also like road traffic noise levels to be continuously monitored over the long-term to demonstrate that the low noise road surfacing proposals achieve the performance assumed in the assessment. This should comprise a single monitoring location in the Riverside Park/Thong Lane area, adjacent to the new road. This data should be audited 	<p>Environmental Statement - Appendix 12.10 - Road Traffic Noise Mitigation and Cost Benefit Analysis [APP-450]</p> <p>Environmental Statement - Appendix 12.7 - Noise Insulation Regulations Assessment [APP-447]</p>
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	annually to assess the need for earlier than scheduled intervention (surface replacement).	
ii. Whether the approach on mitigation is appropriate.		
iii. Whether there would be adequate controls in respect of future maintenance works.		