

ExQ2: Questions from Examining Authority

Gravesham Borough Council Response

(IP ref: 20035747)

Q #	To	Question	Response
6		Geology and Soils	
Q6.1.2	Applicant Environment Agency Local Authorities	<p>Limitations of existing survey</p> <p>The wording of GS001 in 6.3 Environmental Statement Appendices Appendix 2.2 – Code of Construction Practice, First Iteration of Environmental Management Plan [REP5-049] REAC table (Table 7.1) suggests that “.... <i>Supplementary ground investigations would be undertaken to assess residual contamination risks</i>”. This infers that the position analysed within the ES and supporting documentation may not accurately reflect what is found on site as further ground investigations are deemed necessary.</p> <ul style="list-style-type: none"> • What is being proposed for intrusive ground investigations where contaminated soils are present without drilling being required? How has this been secured? • Should a programme of instrumentation and monitoring, such as suggested in GS003, be appropriate with respect to all cases where contaminated land is present? • If so, where would this be secured and appropriately managed? 	<p>Gravesham would like clarity on any location within the Borough where the current survey material is deficient, and therefore where the ES may be inadequate. The areas that require further archaeological investigation are presumably primary candidates. A particular potential concern would be the Southern Valley Golf Course (SVGC) site. The bunkers etc. were built using fill material from the Greenwich Peninsula, controlled by the Environment Agency. Some material on the Greenwich Peninsula was highly contaminated, and although some work has been done on the SVCG fill more may be needed, plus any potential implications arising from the former use as an airfield.</p>
7		Tunnelling Considerations	

Q #	To	Question	Response
Q7.1.1	Port of London Authority, Port of Tilbury London Ltd, Environment Agency, Marine Management Organisation, Local Authorities	Tunnelling techniques Do you consider that the additional controls/commitments in RDWE059 to only utilise closed face tunnelling techniques in the Code of Construction Practice [REP5-049] would be adequate? If not, please provide details and suggest updated wording for a form of tunnelling method security that you would consider to be adequate.	GBC does not have the technical expertise or knowledge to question the adequacy of the proposed use of closed face tunnelling techniques but is content that the principle of what is proposed is reasonable and is secured by RDWE059. However, GBC would suggest that there should be some definition of what the techniques comprise so that GBC (and/or any other regulatory body) is in a position to monitor that the REAC commitment is being complied with. Such a definition could be added to RDWE059.
Q7.1.2	Applicant Environment Agency Local Authorities	Vibration Do you consider that the controls in the Deemed Marine Licence in the dDCO [REP5-024] and the associated controls in the Code of Construction Practice [REP5-049] in respect of vibration for the tunnelling and associated works are adequate? If not, please provide details and suggested updated wording that you would consider to be adequate.	Tunnelling vibration: the Council consider the controls are adequate based on its understanding of the likely impacts. Caravans at Viewpoint Place and Horseshoe Meadow are most vulnerable and also St Mary's Church, Chalk due to its historic nature.
Q7.1.3	Applicant, Port of London Authority, Port of Tilbury London Ltd, Environment Agency, Marine Management Organisation, Local Authorities	Tunnel Depth Report Please provide an update on any further discussions in respect of the Tunnel Depth Report [REP3-146] . Please set out any outstanding areas of disagreement and what, if any additional or updated controls you would consider to be necessary.	This is a matter primarily for the Applicant and the Port of London Authority, and Gravesham has nothing to add at this time. The Council would have potential concerns if the tunnel went deeper and it resulted in knock-on implications for the tunnel portal and approach cutting.
Q7.1.4	Port of London Authority, Port of Tilbury London Ltd, Environment	Ground protection tunnel Do you consider that the additional controls/commitments in GS024, RDWE017, 018a and 018b of the Code of Construction Practice	These are touching on highly technical areas where the Council does not have the knowledge or advice to make detailed representations. The comments are therefore high level and are on the

Q #	To	Question	Response
	Agency, Marine Management Organisation, Local Authorities	[REP5-049] are sufficient? If not, please provide reasoning and suggested wording for additions/updates.	basis that if the need for the ground protection tunnel can be avoided, it will be. GS024 – EA to be consulted on means to avoid blow-out or grout leakage during boring RDWE017 – Avoid unnecessary surface penetration RDEW018a – Ground protection tunnel construction RDEW018b – Reinstatement of any surface Gravesham is broadly content with these as providing adequate control over tunnelling activities – see also Q8.1
Q7.1.5	Port of London Authority, Port of Tilbury London Ltd, Environment Agency, Marine Management Organisation, Local Authorities	Tunnelling controls Do you consider that any additional or updated controls are necessary in respect of the tunnelling works? If so, please provide details and suggested wording.	See response to Q8.1
8		Waste and materials	
Q8.1.1	Gravesham Borough Council	Southern tunnel compound Please provide comments on the updated/additional commitments (MW009 and MW017) in the Code of Construction Practice [REP5-049] . Do you consider that, with these additions, the commitments are sufficient? If not, please provide details and suggestions for additional/updated commitments.	GBC would be satisfied if Revised MW009 and new MW017 were amended as follows. GBC would then cease to pursue its request for a new requirement relating to tunnelling as set out in the list of proposed amendments submitted at D4 [REP4-302] - see amendment no 26 in that list.

Q #	To	Question	Response
			<p>REAC ref MW009 with GBC proposed amendments in red</p> <p><i>The tunnel boring machinery will be serviced from the North Portal. All material excavated by the tunnel boring machinery will be generated as a slurry and this will be transferred by pipeline through the tunnel to the North Portal for placement. Any material excavated by means other than by tunnel boring machinery will be transferred through the tunnel to the North Portal for placement. Similarly, all tunnel segments and major services required to operate the tunnel boring machinery and erect the tunnel segments will be supplied from the North Portal where major services comprise slurry feed and return pipelines, main and auxiliary power cables, cross passage dewatering wastewater pipeline, fire mains and the temporary tunnel lighting system.</i></p> <p>REAC ref MW017 with GBC proposed amendments in red</p> <p><i>There will be no storage of concrete tunnel segments, or other materials, plant or machinery to be used in the construction of the tunnel on the ground surface at the southern tunnel entrance compound. Any such segments, materials, plant or machinery stored at the southern tunnel entrance compound, other than on the ground surface, will be brought in from the North Portal.</i></p>

Q #	To	Question	Response
Q8.1.3	Applicant, Local Authorities, Port of London Authority	<p>Transportation of materials and waste</p> <p>Please provide an update on any further discussions/agreement in respect of using river transportation for the delivery of materials and removal of waste? In responding, please provide information in respect of:</p> <ul style="list-style-type: none"> • How river transportation could be maximised where it is appropriate; and • Where other transportation would be more efficient given the linear nature of the project? <p>As a result of the responses provided on these points, are there any updates to the Code of Construction Practice (or other control documents) that should be made?</p>	<p>The Council would support the use of the River for transport, especially via Northfleet terminal which has rail access and a direct link to the A2. Suggester from of words to achieve that is:</p> <p>The undertaker will require the contractor to seek to maximise, in so far as reasonably practicable and within existing Order powers (including deemed marine licence powers), the volume of excavated and construction material related to the construction of works south of the River Thames to be brought in and removed by river whilst balancing the wider environmental impacts to the local community.</p>
Q8.1.4	Applicant, Local Authorities and Environment Agency	<p>Excavated materials</p> <p>With regard to the Outline Materials Handling Plan [REP5-051], the Excavated Materials Assessment [APP-435] and the Code of Construction Practice [REP5-049]:</p> <ul style="list-style-type: none"> • Could greater certainty be provided that the quantities of excavated materials would not exceed the estimates? • In the event that quantities did exceed the estimates, what remediation/mitigation could be secured? 	<p>On a point which is directly related to the amount of excavated materials to deposited locally south of the river, the Council has previously expressed a concern that the vertical limits of deviation for the proposed Chalk Park land form cannot be ascertained because the engineering sections do not show the levels. The Applicant has acknowledged this omission and said it would provide a response at D6. The Council reserves its position, pending sight of that response.</p>

Q #	To	Question	Response
		<ul style="list-style-type: none"> Should/could the controls in the Code of Construction Practice be updated to deal with a situation where the quantities were exceeded? 	
Q8.1.5	Applicant, Local Authorities and Environment Agency	<p>Waste hierarchy</p> <p>Could/should the wording in MW007 of the Code of Construction Practice [REP5-049] be strengthened to provide greater certainty that the waste hierarchy will be followed appropriately? Would the use of individual targets for different materials be an appropriate approach?</p>	<p>MW007 says:</p> <p>Excavated material (and all wastes) would be managed in line with the waste hierarchy. Preference would be given to appropriate reuse, recycling and/or recovery before disposal where feasible and permitted by the design.</p> <p>Where excavated materials and soils are to be reused, recycled and/or recovered within the Order Limits this would be subject to the relevant regulatory controls. For example: Directive 2008/98/EC on Waste (Waste Framework Directive), Article 2, environmental permit (as per the Environmental Permitting (England and Wales) Regulations (2016)), exemption and/or a Materials Management Plan (as per the Definition of Waste: Development Industry Code of Practice (CL:AIRE, 2011)).</p> <p>Where excavated materials and soils cannot be reused, recycled and/or recovered within the Order Limits opportunities would be sought within schemes or facilities outside of the Order Limits.</p> <p>The final option would be disposal.</p> <p>The Council asks the applicant whether the materials for the false cutting south of Thong are covered by MW002</p>

Q #	To	Question	Response
9		Noise and vibration	
9.1		Noise and vibration: general questions	
Q9.1.1	Local Authorities	<p>Noise Insulation Regulations</p> <p>Do you consider the additional commitment (NV018) in the Code of Construction Practice [REP5-049] would be sufficient to address potential eligibility under the Noise Insulation Regulations 1975? If not, please provide details and any suggested additional wording/commitments that you consider to be necessary.</p>	<p>At ISH8, the Applicant explained that it had a noise insulation and a temporary rehousing policy, which enables assessments to be carried out prior to construction activity to identify properties that might qualify for noise insulation or temporary rehousing. It was explained that they are then contacted again at construction or just prior to construction stage, and if certain criteria are satisfied as to the noise levels that they'll experience, they could qualify for noise insulation or temporary rehousing.</p> <p>The Council supports the points made by Thurrock Council at the hearing about the fact that this policy does not appear to have been submitted to the Examination, and that there appear to be no means by which it is secured, and no means to ensure that it is not altered in detriment to potential beneficiaries.</p> <p>The suggestions made for altering NV018 below are subject to the Council and its technical experts studying the Applicant's policy, which will presumably be provided at deadline 6.</p> <p>NV018 should be amended to say:</p> <p>In accordance with "Calculation of Road Traffic Noise" (1988), assessments will be made in advance of the Project opening in respect of A final assessment and verification of possible</p>

Q #	To	Question	Response
			<p>eligibility of buildings for insulation work or grants under the Noise Insulation Regulations 1975 in relation to operational noise. Final assessments in relation to operational noise will be undertaken within the first year of the Project opening.</p> <p>Assessments and verification of eligibility of buildings of buildings for insulation work or grants under the Noise Insulation Regulations 1975 in relation to construction noise will be undertaken before the commencement of construction in the relevant location and as reasonably necessary throughout the construction period in the relevant location.</p> <p>The undertaker will comply with the National Highways Policy [name] in so far as it provides equal or greater protection for those affected by noise than “Calculation of Road Traffic Noise”. No variations made to that policy made after 30 November 2023 shall have effect in relation to the project unless agreed by the Secretary of State.</p>
Q9.1.2	Applicant and Local Planning Authorities	<p>Noise Insulation Regulations</p> <p>Should the commitment in NV018 of the Code of Construction Practice [REP5-049] be updated to provide a positive commitment to secure the provision of noise insulation in the event that any property/ies are found to be eligible?</p>	<p>The Noise Insulation Regulations place the Applicant under a duty to provide insulation or make grants if certain operational noise criteria are met (regulation 3). GBC see no reason to supplement that duty.</p> <p>There is a discretion (regulation 4(4)) to provide insulation or make grants where a building has a façade which is contiguous with or is part of a</p>

Q #	To	Question	Response
			<p>series of facades which are contiguous with an eligible building.</p> <p>Note that under Regulation 5 there is power to provide noise insulation but not duty.</p>
Q9.1.3	Local Planning Authorities	<p>Construction</p> <p>Do you consider that the package of commitments is sufficient to monitor and, if necessary, mitigate noise and vibration impacts during the construction phase? If not, please provide details and any suggested additional wording/commitments that you consider to be necessary.</p>	<p>The Applicant has committed to gaining CoPA 1974 Section 61 consent by developing a detailed NVMP for each work area. This will require agreement from the LPAs that appropriate mitigation will be implemented to ensure that proposed construction methodologies will not result in significant adverse effects. The S61 agreement will include appropriate monitoring (unattended long-term and, as required attended short-term) to ensure limits are being complied with.</p>
Q9.1.4	Local Authorities	<p>Operational noise and vibration monitoring and mitigation</p> <p>Please provide any comments in respect of the updated/additional commitments in the Code of Construction Practice [REP5-049], such as NV013 and NV019. Do you consider that the package of commitments is sufficient to monitor and, if necessary, mitigate noise and vibration impacts during the operational phase? If not, please provide details and any suggested additional wording/commitments that you consider to be necessary.</p>	<p>NV013 is about road surfacing. It says:</p> <p>a) For the locations identified on ES Figure 12.6, a surfacing system that has a reported noise Road Surface Influence (RSIH) of -7.5dB(A) or better in accordance with the Highway Authorities Product Approval Scheme certification system shall be installed.</p> <p>b) For the locations identified on ES Figure 12.6, a 'Level 3' (i.e. RSIH -3.5 dB(A) or better), very quiet surfacing material, as defined by Manual of Contract Documents for Highway Works Volume 1 - Specification for Highway Works, Series 0900, Table 9-17, shall be installed on all other new and</p>

Q #	To	Question	Response
			<p>altered trunk roads and associated slip roads forming part of the Project.</p> <p>c) For the locations identified on ES Figure 12.6, a 'Level 2' (i.e. RSIH -2.5dB(A) or better), quieter than Hot Rolled Asphalt surfacing material, as defined by Manual of Contract Documents for Highway Works Volume 1 - Specification for Highway Works, Series 0900, Table 9-17, shall be installed on all new and altered local roads forming part of the Project.</p> <p>d) 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.</p> <p>NV019 is about Performance specification of specific operational mitigation measures at preopening stage. It says:</p> <p>The performance specification of specific operational mitigation measures would be confirmed prior to opening of the road. This would consider issues such as the following:</p> <p>a) Visual surveys to ensure that mitigation secured through REAC Ref. NV011 are implemented appropriately and correctly installed</p>

Q #	To	Question	Response
			<p>onsite (length, height and position), and fitment is to a good quality of workmanship.</p> <p>b) Review of installation specifications (Highway Authority Product Approval Scheme Certification, sound reduction index performance certification) to ensure the performance assumptions in the ES assessment, secured under REAC commitment NV013, are achieved by the products installed onsite, including consideration of deterioration.</p> <p>c) Ongoing maintenance and upkeep of acoustic mitigation measures to ensure that performance does not deteriorate outside of allowable tolerances from DMRB LD 119 through ongoing maintenance programmes associated with the Project</p>
Q9.1.5	Local Authorities	<p>Construction vibration monitoring: heritage assets</p> <p>Are the controls in the dDCO [REP5-024] and the associated controls in the Code of Construction Practice [REP5-049] sufficient to adequately monitor the impact of vibration on heritage assets which could be potentially vulnerable to vibration relating to construction traffic/operations?</p>	<p>Heritage assets that are potentially sensitive to vibration, including construction traffic, should be identified within the S61 consents application. This should include proposed vibration thresholds based on building condition surveys conducted prior to works commencing. Thresholds, and an appropriate monitoring regime (if required) should be agreed with the LPAs through this process</p>
11		Biodiversity	
11.1		Environmental mitigation	
Q11.1.2	Natural England IPs with an interest in the natural environment Applicant	<p>Monitoring of success</p> <ul style="list-style-type: none"> Do Natural England and other IPs agree that the proposals suggested in the Applicant's response to question Q11.5.2 provide a robust method of 	<p>The Council as a general principle would expect there to be monitoring of the effectiveness of all mitigation and compensation features to ensure that they are performing the functions they are being provided for. For example, the Green</p>

Q #	To	Question	Response
		<p>monitoring the success of species mitigation proposals?</p> <ul style="list-style-type: none"> • Should aspects of the monitoring of the success of the proposed Green Bridges in relation to the use by the design species be undertaken alongside any monitoring required to meet Licence Applications? • In the document [REP4-182] the Applicant suggests that the oLEMP [REP3-106] refers to monitoring target habitats. Should the oLEMP be more specific in relation to species monitoring? • Over what time period should monitoring and subsequent mitigation and remedial action of different species, take place and are there natural, extreme weather events that justify extensions to the periods of assessment and replacement suggested? Can the Applicant set this information out in a table. • How could such be secured in the documentation? 	<p>Bridges need to be monitored to ensure the landscape planting is meeting its objectives as well providing the necessary biodiversity connectivity. This goes with the principle that where possible corrective action should be taken.</p>
11.4		Shorne Woods Country Park	
Q11.4.1	Applicant Natural England Kent Downs AONB Unit Kent County Council Gravesham Borough Council	<p>Retention of construction compound as a car park: AONB considerations</p> <p>It is suggested that the intention is for part of the construction compound in this location (Work No. CA2) to be repurposed as a car park.</p>	<p>Gravesham Borough Council has already made clear its reservations about this car park for multiple reasons including the sites future management, development in the Green Belt (assuming structures are needed to support income generating uses) and potential to add to traffic through Thong village accessing the site from the urban area. That said there is a need to</p>

Q #	To	Question	Response
	Shorne Parish Council	<ul style="list-style-type: none"> • Is an additional car park in this location necessary? • Should this facility be viewed as necessary, can its location be justified in AONB terms? <p>To the extent that additional visitors to this part of the AONB potentially could have negative implications from overuse on particular trees/paths, but additional parking provision may encourage additional visitor use and pressure;</p> <ul style="list-style-type: none"> • Can the Applicant signpost where the introduction of a new permanent car park is assessed within the submitted documentation and the AONB effects, if any, that are attributed to it? • Is further mitigation required to be provided, or can it be demonstrated that it is accommodated within existing proposals? How is this secured? 	<p>review the car parking provision across the area (Chalk Park, Cascades, Shorne Woods CP, Jeskyns, Ashenbank Wood and Cobham Woods). Study work on a possible National Nature Reserve (being funded via Designated Funds) provides a forum for consideration of this issue. The proposed car parking can be replaced by additional tree planting as is proposed for the immediate surrounding area.</p>
Q11.4.2	Applicant Natural England Kent County Council Gravesham Borough Council Shorne Parish Council	<p>Retention of construction compound as a car park: SSSI considerations</p> <p>With reference to the impact of the construction compound retention raised in Q11.4.1, there are potential impacts on the Shorne and Ashenbank Woods SSSI that also arise from this proposal. Natural England currently view these as underassessed.</p> <ul style="list-style-type: none"> • Is an additional car park in this location necessary? 	See above Q11.4.1

Q #	To	Question	Response
		<ul style="list-style-type: none"> • Should this facility be viewed as necessary, can its location be justified in SSSI terms? • If there is a view that a permanent car park is to be created, the Applicant is requested to set out its latest view on the number of vehicles using the car park each day (moving on from the assessment in the ES of one trip each way per carparking space), to a breakdown of modes of access. • A statement of any mitigation measures necessary in respect of the SSSI designation should also be provided. Where would this be secured? 	
13		Social, economic and land-use considerations	
13.1		Socio-economics, local impacts and health	
Q13.1.2	Applicant, LPAs	<p>Green Belt: applicability of ‘inappropriate development’</p> <p>NPSNN paragraph 5.178 addresses development in the Green Belt in the following terms. “When located in the Green Belt national networks infrastructure projects may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt and there is a presumption against it except in very special circumstances. The Secretary of State will need to assess whether there are very special circumstances to justify inappropriate development. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the</p>	GBC will respond at D7 when it has considered the Applicant’s response at D6. In short however the Council considers that the scheme should be considered as a whole, and therefore cannot be broken into component parts.

Q #	To	Question	Response
		<p>presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt, when considering any application for such development.”</p> <p>Inappropriate development in the Green Belt for the purposes of the NPSNN takes the same meaning as it does in the NPPF (see footnote 108).</p> <p>NPPF paragraph 150 addresses inappropriate development in the Green Belt and makes clear that</p> <p><i>“[c]ertain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it.”</i> Local transport infrastructure which can demonstrate a requirement for a Green Belt location is included within the description of development that is not inappropriate in these terms.</p> <p>It seems that the Applicant’s Green Belt Assessment [APP-500] has accepted that the project as a whole represents ‘inappropriate development’ in the Green Belt, resulting in ‘definitional harm’ to which significant weight should be attached in the planning balance. However, having regard to the NPSNN and NPPF positions set out above, the ExA is not clear that is the case in policy terms.</p>	

Q #	To	Question	Response
		<ul style="list-style-type: none"> • Is the proposed development (or are any relevant elements of it) 'local transport infrastructure' <p>which can demonstrate a requirement for a Green Belt location, and if so,</p> <ul style="list-style-type: none"> • what elements of the projects fall within that definition and what are the policy consequences of that? <p>The Applicant is requested to address this matter at Deadline 6 and the LPAs to respond at Deadline 7.</p>	
16.		General and overarching questions	
Q16.1.2	Applicant Local Authorities	<p>Environmental Management Plan (EMP) Q2</p> <p>Paragraph 2.3.9 of Document 6.3, Appendix 2.2 Code of Construction Practice (First iteration of Environmental Management Plan) v5 [REP5-049] states that "The EMP2 will require that construction phasing plans are made available to the local authorities, prior to works commencement."</p> <p>The ExA acknowledges that Document 6.3, Appendix 2.2 Code of Construction Practice (First iteration of Environmental Management Plan) v5 [REP5-049] includes a communication and community engagement section at Chapter 5, but the ExA seeks the views of the Applicant and the Local Authorities on whether the requirement set out in Paragraph 2.3.9 should have an identified lead period so that local authorities can communicate with their residents sufficiently in advance. The ExA considers that building in a lead</p>	<p>The Council would find a minimum lead in period helpful, not only so that it can communicate with its residents sufficiently in advance but also so that it can plan its own resources to deal with applications and consultations.</p> <p>The Council suggests paragraph 2.3.9 be amended as follows.</p> <p>2.3.9 The EMP2 will require that construction phasing plans are made available to the local authorities, at least 42 days prior to the commencement of works in the area of the local authority concerned and will provide updated versions of the construction phasing plans where any significant change is made and in any event at least 28 days before the commencement of every phase identified in the construction phasing plans.</p>

Q #	To	Question	Response
		time for this information to be shared would reduce complaints to a Local Authority and to National Highways when construction starts.	
Q16.1.4	Local Authorities Other Statutory Stakeholders Other Interested Parties	<p>Environmental Management Plan (EMP) Q4</p> <p>Notwithstanding any other questions included in this question set about specific commitments in the Register of Environmental Actions and Commitments Table 7.1 in Document 6.3, Appendix 2.2 Code of Construction Practice (First iteration of Environmental Management Plan) v5 [REP5-049], the ExA would like to receive a set of dedicated comments from Local Authorities, other Statutory Stakeholders or any other IP on any specific concerns with any of the measures (or their wording) in the Register of Environmental Actions and Commitments in Table 7.1, or indeed on any of the drafting in Document 6.3, Appendix 2.2 Code of Construction Practice (First iteration of Environmental Management Plan) v5 [REP5-049].</p>	Suggested new REAC commitments and changes to existing REAC entries are shown in the table below.

REAC commitments showing changes suggested by Gravesham BC			
REAC Ref.	Name	Commitment showing GBC suggested changes in red	Comment
LV008	Southern tunnel entrance compound, bund	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. The phasing of the works would be planned so that so that the bunds are in place before the main compound activities commence.	See explanation in ISH7 post hearing written representations
New	Southern tunnel entrance	Reducing the impact on residential properties on Thong Lane and Rochester Road (A226) during construction by	See explanation in ISH7 post hearing written representations

REAC commitments showing changes suggested by Gravesham BC			
REAC Ref.	Name	Commitment showing GBC suggested changes in red	Comment
	compound, soil placement phasing	phasing the works such that [the deposition of material commences at the [southern] part of the soil storage areas and moves generally [northwards].	
New	Southern tunnel entrance compound, haul road	So far as reasonably practicable, [acoustic][solid] fencing will be provided between the Horseshoe Place and Viewpoint traveller sites and 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. In the detailed design, the route of the haul road shall be located as far from the traveller sites as is reasonably practicable, taking account of the need to ensure safety and having regard to the location of other sensitive receptors. The haul road will only be used until the main access haul route from the A2 becomes available.	See explanation in ISH7 post hearing written representations
LV010	Southern tunnel entrance compound, construction compound facilities	Construction compound facilities greater than 6m in height would be located to maximise distance from residential areas of Chalk and adjoining Thong Lane <u>and Rochester Road (A226)</u> , together with Thamesview School, as far as reasonably practicable. All construction compound facilities would be located to maximise distance from the property known as Polperro and the Horseshoe Place and Viewpoint traveller sites, as far as reasonably practicable.	
MW009	Servicing the tunnel boring machinery	The tunnel boring machinery will be serviced from the North Portal. All material excavated by the tunnel boring machinery will be generated as a slurry and this will be transferred by pipeline through the tunnel to the North Portal for placement. Any material excavated by means other than by tunnel boring machinery will be transferred through the tunnel to the North Portal for placement.	See response to question above GBC maintains its position that this should be dealt with by way of requirement, and wording was provided at D4 in [REP4-302] . Without prejudice to that position, GBC suggests these changes to

REAC commitments showing changes suggested by Gravesham BC			
REAC Ref.	Name	Commitment showing GBC suggested changes in red	Comment
		Similarly, all tunnel segments and major services required to operate the tunnel boring machinery and erect the tunnel segments will be supplied from the North Portal where major services comprise slurry feed and return pipelines, main and auxiliary power cables, cross passage dewatering wastewater pipeline, fire mains and the temporary tunnel lighting system. No worksites to the south of the River Thames will be used for the storage of materials, plant or machinery to be used in the construction of the tunnel.	MW009 should the ExA not find in favour of the council's suggestion for a requirement. See also MW017 below
MW017	Storage of tunnel segments at the southern tunnel Entrance compound	There will be no storage of concrete tunnel segments, or other materials, plant or machinery to be used in the construction of the tunnel on the ground surface at the southern tunnel entrance compound. Any such segments, materials, plant or machinery stored at the southern tunnel entrance compound, other than on the ground surface, will be brought in from the North Portal.	See response to question above
NV018	Noise Insulation Regulations Assessment	In accordance with "Calculation of Road Traffic Noise" (1988) assessments will be made in advance of the Project opening in respect of A final assessment and verification of possible eligibility of buildings for insulation work or grants under the Noise Insulation Regulations 1975 in relation to operational noise. Final assessments in relation to operational noise will be undertaken within the first year of the Project opening. Assessments and verification of eligibility of buildings of buildings for insulation work or grants under the Noise Insulation Regulations 1975 in relation to construction noise will be undertaken before the commencement of construction in the relevant location and as reasonably	

REAC commitments showing changes suggested by Gravesham BC			
REAC Ref.	Name	Commitment showing GBC suggested changes in red	Comment
		necessary throughout the construction period in the relevant location.	
New REAC	Landscaping planting: comprehensive assessment	In finalising the location of landscape planting, compensatory ancient woodland planting and soil translocation during and/or before the detailed design, the undertaker shall undertake, in consultation with the local planning authority, a comprehensive review of the proposed location of that planting taking into account its landscape, biodiversity, and cultural heritage (above and below ground) implications. The undertaker will implement any conclusions of that review.	