

## **Principal Areas of Disagreement Summary Statement**

### **Lower Thames Crossing – TR010032**

### **Gravesham Borough Council (IP ref: 20035747)**

### **Version 3 Submission 31 October 2023**

#### **Notes:**

- This summary statement sets out in brief terms the main concerns and proposed remedies of Gravesham Borough Council. More detail will be provided in other documentation to be submitted in due course to the Examining Authority. This document states the current position of the Council, which may change, particularly once the application documents have been considered in more detail and as those documents change over time.
- It is derived from not agreed document APP-125 5.4.4.6 Statement of Common Ground between National Highways and Gravesham and uses the same structure, and as updated by National Highways in their submission of 18 July 2023 REP1-100 (clean) and REP1-101 (tracked changes). A fresh version of this will be submitted by the applicant at Deadline 6. This has been discussed with the Council but not yet agreed as it has not yet been possible to fully review the content and obtain necessary internal sign off. This is being progressed within resource constraints.
- Some additional points have been added as a result of the comments on the Gravesham Relevant Representation (pages 49-71 of REP1-180)
- The Council takes a holistic view of the impacts from the scheme on its residents and businesses regardless of where responsibility for particular matters may formally sit
- There are some additions arising from analysis the application ('DCO'), but more may be forthcoming from further exploration of the documents
- For avoidance of doubt when considering environmental impacts that includes those arising from the substantial utility diversions proposed
- Discussions with National Highways are ongoing so progress on some issues should be possible in the near future
- 'Likelihood of concern being addressed during Examination' has been assessed using best available information. Discussions with National Highways have informed these assessments but do not necessarily reflect their views. The Council has considered the ease with which an issue could be resolved, given a willingness to address the issue. The categories originally used were:

- Likely – issues where agreement should be reachable, or a relatively simple change is required
- To be discussed – issues that are being or are about to be discussed and will be updated upon in due course
- Unlikely – issues where agreement is unlikely, or it is difficult to see what a solution could be
- For most items these have been amended to reflect progress to:
  - Matter not agreed
  - Matter under discussion
  - Matter agreed

Number	Principal Issue in Question	SoCG reference	The brief concern held by Gravesham BC to be reported on in full in WR and LIR	What needs to: change, or be included, or amended so as to overcome the disagreement	Likelihood of the concern being addressed during Examination
<b>Draft DCO and consents</b>					
GBC001	DfT not appropriate body for decision making on Requirements	2.1.1, 2.1.150 & 2.1.156	SoS cannot continue to be judge and jury. The lack of an appeal mechanism for National Highways implies that consent will be given.	<p>Decision making should rest with the appropriate body (County, District etc.) depending on topic.</p> <p>Must be a clear protocol of consultation prior to any Requirements submissions and funding for the work involved by Gravesham Council.</p> <p>See <a href="#">REP1-236</a> ISH2 submission item 4 (d) page 6</p>	Matter not agreed on decision making. Offer made in draft s.106 agreement to the Council about staff resources and this is now under discussion
GBC002	National Highways	DCO	National Highways assume that other public bodies do not need additional funding to deal with the extra demands imposed on them by their scheme. Gravesham BC, Kent CC, health authorities and the emergency services are examples of agencies that will incur additional expenditure. There is no reason to treat NH in any different way to a private developer.	For GBC agreement under s.106 to fund costs of monitoring and dealing with Requirement applications, monitoring and other matters. Alternatively, a Fee Schedule could be included in the DCO.	S.106 discussions as noted under GBC002 in progress. Core point remains that the applicant is in no different position to any other applicant and wider benefits do not outweigh specific local issues arising from the project.

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GBC003	Scope of the DCO	2.1.154	The draft DCO fails to make provision for improvements at Blue Bell Hill (A229) which are necessary to allow the A122 to function.	Either include a scheme as associated development or commit to fully funding the scheme that KCC is developing.  KCC LIR provides more information on issues at Blue Bell Hill	Matter not agreed  Network North only provides for possible 100% funding to KCC if business case agreed. There is no certainty of funding, so the application needs to be considered without any improvements to the A229
GBC004	Design and construction detail issues	DCO & 2.1.156	The draft DCO has to allow for some flexibility but at present contains too much ability to modify the scheme to the detriment of local residents and road users on the grounds of expediency.	Provide greater detail about specific design and construction details in either the DCO or supporting documents which there is a commitment to comply with, unless specifically justified otherwise.  Kent Roads contractor about to be appointed that may allow some progress on detailed issues	Matter under discussion
GBC108	Use of single TBM	New	Issue raised in National Highways Minor Refinements Consultation of possible use of a single TBM to	Ensure that dDCO and control documents prevent spoil and other operations occurring on Kent side	Matter under discussion  Requirements MW009 & MW017 have been

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			construct Thames tunnels rather than two		added considered and response provided in answer to ExQ2 Q8.1.1
<b>Need for Project</b>					
GBC005	Project meeting its objectives	2.1.2	The application as submitted does not provide sufficient justification to meet the claimed seven objectives when set against negative impacts.	The scheme should not proceed in principle.	Matter not agreed
GBC006	Local economic growth	2.1.3	Gravesham does not feel that the Borough will greatly benefit from the scheme, and in the short and long term there are major disbenefits.	Local community suffers significant negative impacts from construction and operation but without major economic gains that would justify it.	Matter not agreed
<b>Planning Statement / Policy</b>					
GBC007	Green Belt	2.1.4 & 2.1.5	Green Belt 'special circumstances' justification is deficient, so the decision maker does not have the necessary information to make an informed decision. A robust and transparent assessment of the harm to the Green Belt in terms of its spatial and visual impacts and	Revise 7.2 Planning Statement Appendix E needs to be revised to enable the ExA to reach a view on it.  In response to ExQ1 13.1.20 the Council submitted an outline	Likely  Awaiting Applicants responses to ExQ2 Q13.1.2 & 3 before making further comment

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			to the national and local Green Belt purposes is needed.	appraisal at <a href="#">REP4-291</a> . ExQ2 Q13.1.2 & ExQ2 13.1.3 seek further information on this topic	
GBC008	Route alignment impact on Local Plan	2.1.6 & 2.1.162	Impact of scheme, including utility diversions, on potential development opportunities on the east side of Gravesend. The availability of highway capacity in the network as a result of the scheme to support development in North Kent.	Upgrading local road element of junctions along A2 (Pepper Hill / Tollgate etc). to ensure capacity for development and other appropriate measures where flows increase. Funding for the traffic modelling to establish what is required (as required by NH Spatial Planning Team) and where relevant commit to funding for LTC impact.  See <a href="#">REP1-241</a> KCC LIR Appendix B for junction issues from modelling using the Kent Model. A further report is expected for submission at D7.	To be discussed  Further comment will be made after review of the further report from KCC's consultants, WSP.  Adequate monitoring is required to establish actual impacts, whether the project is the cause, and take appropriate action (which needs to be funded). Silvertown approach is commended.

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GBC009	Alternatives schemes & design parameters	2.1.7 & 2.1.8	Alternative schemes at the Dartford Crossing have not been properly and comparatively reassessed since route choice in 2017 despite significant change in circumstances. The existing scheme could be designed for lower speeds to allow for a more compact footprint and therefore less environmental impact	Revised scheme focussed on Dartford Crossing.	Matter not agreed
GBC010	Lack of non-car travel proposals in the application	2.1.9	The project (apart from PROW diversions) is entirely car based and so does not address the transport strategy for the area or national policy.	Positive support for local public transport and active travel modes (including Tilbury Ferry) and be part of a larger committed strategy.	Matter not agreed
<b>Consultation and Engagement</b>					
Covered by comments made in our Adequacy of Consultation response <a href="#">AoC-007</a> Gravesham Borough Council Adequacy of Consultation Response – but some points relevant at this stage picked up under other headings. 2.1.148 added to SoCG.					
<b>Land and Compulsory Acquisition</b>					

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GBC011	Land acquisition at rear of Cascades Leisure Centre site	DCO & 2.1.73	Loss of pitch and putt facility and need to agree replacement as well as compensation for impact on Cascades site operations	Agreement needs to be reached – studies, discussions and negotiations ongoing  The issues were explained at CAH3. Discussion on going and fresh offer awaited.	Likely
GBC012	Viability of farm holdings impacted by scheme – in particular, the site at corner of Thong Lane and Rochester Road (A226). Includes the nitrogen compensation sites.	2.1.13 & 2.1.42	Question over land holdings impacted by scheme and in particular A226 corner site which becomes isolated from the farming unit	Answer the question posed in the SoCG items (references in third column).  Rochester Bridge Wardens raised issues on this and land on the marshes in CAH4 – see transcript EV-060 p.10-29	Matter not agreed
GBC013	Landscape maintenance	2.1.14	Reassurances that landscaping and planting will be maintained in the longer term.	REAC LV003 provides for 5 years for initial establishment – longer term required.	Likely  National Highways have confirmed in meetings commitment to maintain land, possible through third parties, acquired for the new/expanded highway, and for mitigation and compensation areas.



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GBC113	Special category Land	2.1.170	Section 131 and 132 land and their replacement	Shorne Woods, Roman Road and Cyclopark	Matter agreed
<b>Design – Road Tunnel and utilities</b>					
GBC014	A2 junction	2.1.12	3D model or cross sections (under AoC in SoCG) – see also GBC067.	Provide information to understand impact of junction in the landscape.	Matter under discussion. Fresh information requested in ExQ 2 Q12.3.1 from Thong Lane south bridge
GBC015	Chalk Park	2.1.15	Design purpose and function of the new open space.	Introduction of alien design features into the landscape of open fields.	Matter under discussion
GBC016	Lighting	2.1.16	Landscape impact of lighting in areas where not currently found.	Assurances as to light spill – forms part of landscape issue.  See Gravesham LIR Appendix 7b	Matter under discussion
GBC017	Impact on Local Road network during: <ul style="list-style-type: none"> <li>• construction</li> <li>• operation</li> </ul>	2.1.17	KCC work with their model shows issues with Henhurst Road and A2 junctions – in the context of point GBC038 on the amount of development in the modelling.	Further analysis of technical work and exploration and sensitivity testing of options for mitigation on LRN (which may require multiple funding sources including National Highways).	Matter under discussion and fresh report expected from KCC consultants WSP at D7

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				Adequate monitoring required.  New technical work from KCC & Medway allows reassessment of the overall position	
GBC018	Monitoring of road network in construction	DCO	Real time monitoring of actual flows on network (strategic and local) with appropriate set of mitigation measures in the event of significant congestion issues.	Commitment to appropriate monitoring and corrective action if required.	Matter under discussion <a href="#">APP-545</a> 7.12 Wider Network Impacts Management and Monitoring Plan is not considered sufficient to address the issues and the Silvertown approach is commended
GBC019	A122/A2 junction and related local link roads	2.1.19 & DCO	Analysis how A2/A122 junction will function similar to the analysis carried out at A13 Orsett Cock junction – in particular the impact of the 2 lane sections on the A2 to M2 mainline flow.	Micro simulation or other appropriate method to ensure the junction functions correctly and does not have any knock-on effects on local road network.  Microsimulation (or other) work needs to be supplied to enable view to be taken on the detailed operation and impacts of the scheme.	Matter not agreed. Some development work referred to in Table 3.2 of <a href="#">REP3-126</a> 9.15 Localised Traffic Modelling v2.0  However the issues raised to date by the Orsett Cock microsimulation model casts doubt on the degree of weight that

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					can be attached to LTAM results for complex junctions.
GBC020	Thong Lane Car Park	2.1.20	Objection to provision of facility as inappropriate development in the Green Belt and attracting traffic through Thong from urban area.	Site restored as landscaping after having been a works site. Overall car parking strategy for wider area (involves third parties).	Matter under discussion. KCC have clarified their position in ISH9. Gravesham position remains that site should landscaped as the surrounding land once the construction compound use has ceased.
GBC021	Width of Green Bridges	2.1.21	Further increase in width of green bridges to benefit landscape and increase biodiversity linkage.	Thong Lane south and Brewers Road. Brewers Road space limited, Thong Lane south could be widened and could replace Park Pale bridge as a further option.	Matter not agreed GBC position Green Bridges should be wider
GBC109	Smart motorway design standard on A122	2.1.161	Design Standard proposed for A122 has raised concerns over safety. NB: not about formal road designation		Matter not agreed
<b>Construction Impacts (CEMP/CTMP)</b>					

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GBC022	s.106	DCO	Current s.106 proposal as outlined in document 7.3 inadequate to address the issues identified.	The Council is making a more comprehensive statement of heads of terms to National Highways, attached for information. In this context s.106 is shorthand for combined effect of a s.106 agreement, DCO itself and the Control documents.  No discussions to date but expected shortly	Matter under discussion. Draft S.106 offer has been made and an update is awaited from National Highways.
GBC023	Construction programme	2.1.157	Insufficient detail to allow proper understanding of potential impacts in the 5 ½ year construction period. Understanding control of access to construction sites from a safety and anti-social behaviour point of view (downside is visual impact).	Clearer and more specific programme (appreciating the inherent uncertainties). This is fundamental to understanding impacts on local community.  Appointment of Kent Roads Contractor may assist in taking some issues forward	To be discussed
GBC024	Workforce accommodation	2.1.24 & 2.1.38	Council does not believe that there is sufficient capacity in the local housing market to accommodate additional demand from the construction workforce in a very constrained supply situation. Regular monitoring of	The Council has set out a range of practical solutions to NH in our s.106 draft heads of agreement. Clarity about use of Inn on the Lake Motel which in the DCO application is mooted	Matter under discussion. Additional information supplied on existing pressures on local housing market and the issues faced by the Council as housing

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			workforce to see where they are living and how they are travelling so mitigation measures can be adjusted to suit.	as an accommodation site as previously suggested by GBC. Monitoring strategy also relevant. 7.13 FCTP will need amendment.	authority. New requirement being proposed by GBC
GBC025	Effect on living conditions	2.1.25, 2.1.28, 2.1.30 & 2.1.31	Impact on all property adjoining the construction sites – in particular vulnerable housing at Polperro and caravans at Viewpoint Place on A226 plus along Thong Lane (including Thong itself). Clear strategy and mechanisms for consulting and informing local residents and businesses during construction of what is happening. To include a complaints procedure to deal with issues as soon as possible.	New site for caravans / rehousing should be offered and adequate measures and monitoring to reduce impacts. Set up appropriate mechanisms. NB: these must work seamlessly across the contract boundary along Thong Lane between Kent Roads and Tunnel contracts  Adjoining property issues not addressed  CoCP agrees with complaints commissioner APP-336  2.1.30 & 31 are about cumulative impacts on the community	Gravesham proposing REAC provisions to deal with the issues
GBC026	Use of the river and access thereto	2.1.26 & 2.1.27	Note proposed river use on Thurrock side and intention to keep spoil, apart from contaminated, on site. Also, the	Undertaking to keep issue live as construction programme evolves but could require additional land	Matter under discussion

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			need to import significant amount of material for A122 to A2/M2 eastbound slip.	to be included in the development boundary. Not using River Thames on Gravesham side – information on 1 TBM confirms pipeline for slurry from Kent to Thurrock, and use of new bore to transfer tunnel segments etc to northbound tunnel. Northfleet terminal best option for River transport for south side of Thames	
GBC027	Hydrology impacts	2.1.32, 2.1.136 & 2.1.165	Impacts on hydrology from construction (soil stripping) and spoil storage (surface runoff) on local watercourses, roads and property.	Clear strategy for avoiding any surface flooding or relayed matters.	To be discussed
GBC028	Access to works compounds for workers	2.1.33	Travel to works sites by workforce, parking and related issues as unlike HGV's not constrained.	Fuller understanding of 7.14 oTMPfC given uncertainties in worker accommodation. See GBC024.	Further comment to be made at D7
GBC029	Local Road Network access points	2.1.34	CA2 access via A2 Marling Cross junction and A226 in and out for CA3 – potential impacts on traffic, footway and cycle lanes.	Knock on impacts on LRN and maintenance of routes along A226.	To be discussed

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GBC030	Wider effects of construction access	2.1.39 & 2.1.41, 2.1.42	Overall impact from disruption on local roads (including Marling Cross junction from access sites CA2/3 and on A226) and A2 (including perception thereof) on local businesses and services – including implications from 24 hour working. Impacts on settlements Chalk, Lower Shorne, Higham and Thong as well as Thong Lane residents.	Monitoring and action plan if issues arise plus local liaison arrangements and speedy issue resolution.	Likely
GBC031	Local effects	2.1.40 & 2.1.35	Noise and disturbance to local residents from construction process particularly in the Thong/Riverview Park/Thong Lane/Thong areas.	Minimise impacts on local residents – which includes perception of access issues which may harm businesses in the area.	To be discussed
GBC032	Temporary diversions	2.1.43	Impact of closures – particularly Brewers Road.	Mitigation measures for impact on Local Road Network – including impact of poor access to Shorne Woods Country Park.	REAC proposal to limit time involved
GBC033	Impact of Milton (CA3b) construction site adjacent	2.1.163	Concern over the possible implications for Thames &	Clarification and what might be done if issues arise from	REAC amendment proposed

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	to Thames & Medway Canal		Medway Canal and stability of the North Kent railway.	tunnelling operations or extraction of the Ground stabilisation tunnel boring machine (if needed).  See GBC078	
<b>Operations and Maintenance</b>					
GBC034	Access and incident access times	2.1.45	Emergency services access to tunnels in the event of a major incident within acceptable travel times noting the absence of a hard shoulder and the need to fund additional resources (as necessary) for them.	Needs input from Emergency Services as to whether project as currently designed meets their needs.  Emergency Services Group remains concerned over a number of issues – see their WR REP1-388	Matter under discussion. See SoCG at D6 with Emergency Services Group for current position
GBC035	Evacuation from tunnels	2.1.46	Handing of any drivers and passengers evacuated from tunnels in the event of a major incident. Southern portal is 28m below ground level. Emergency Services need to happy with cross passage spacing.	Clarification for Local Authority role and Emergency Services need to agree.	Matter under discussion. See SoCG at D6 with Emergency Services Group for current position
GBC036	Rendezvous point at Chalk	DCO	Function and location of RVP understood – clarity needed on what facilities it has (buildings,	Development in Green Belt – but as a facility that needs to be ready for use at any point	To be discussed  Greater clarity needed on precisely what will be needed on the



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			lighting, surface etc.) and maintenance thereof  Plan just received of potential helicopter landing location. Understood that Marling Cross to A122 slip is secondary RVP location	Emergency Services group wants greater clarity which leads onto the planning issues that may arise	ground and how it interacts with the access link off A226 and PROW associated with Chalk Park
<b>Charging</b>					
GBC037	Congestion charge on Lower Thames and Dartford crossings	2.1.47 to 2.1.51	Charge discount for local residents should apply to both crossings from start of construction	Agreement to proposal	Matter not agreed
<b>Traffic and Economics</b>					
GBC038	Lower Thames Area Model (LTAM)	2.1.52	Model does not adequately reflect the scale of development in the area and therefore cannot be relied upon as to traffic impacts. The reliability on Local Road Network not good enough to give confidence in the results.	Model run that reflects development includes a realistic set of likely development assumptions without TEMPRO constraint to ensure development in North Kent is not constrained.	Applicant as offered additional run as sensitivity test but that requires North Kent wide agreement for meaningful results. Can be addressed as part of the monitor and manage process
GBC039	DMRB & compliance with EIA regulations	2.1.53, 2.1.54 & 2.1.63	DMRB is only guidance and not to be relied upon in an Environmental Assessment.	Use appropriate guidance and wider interpretation in	Matter not agreed

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				relation to traffic modelling assumptions	
GBC040	Tilbury Junction arrangement	2.1.56 & 2.1.44	Junction reintroduced into the scheme.	Opportunity to re-instate service area to replace that lost at Cobham – but a failure to account for the potential benefits and costs of the development it will facilitate. Modelling does not take account of the development or assess the impacts of traffic that may result.	Matter not agreed
<b>Wider Network Impacts</b>					
GBC041	Effect on Dartford Crossing	2.1.57 & 2.1.167	The actual model results show that after 15 years congestion is more or less back to current levels.	Concede that Objective 4 of project is not being achieved by this scheme.	Unlikely
GBC042	Impacts on wider road network	2.1.58	KCC concerned about impact on strategic network and local road network from the results of using their transport model with LTAM assumptions.	Further detailed analysis of the model results and use of more appropriate development levels as inputs.	Matter not agreed
GBC043	Road asset maintenance	2.1.59	KCC concerned about impact of construction traffic on existing	Ensure existing relevant highways are brought up to an acceptable standard to	Matter under discussion

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			highways which may not be in good condition.	minimise potential impacts during or after construction period from additional traffic.	
GBC044	Monitoring	2.1.60	Continuous monitoring of traffic flows needed before start of construction, then very regular updates during construction period with appropriate remedial action if required. Monitoring at agreed years in the operation phase with a commitment to address any issues that arise as a result of the scheme on both strategic and local highway network.	Approach outlined in 7.12 WNIMMP needs expanding. With modern systems monitoring can be continuous and more widespread.	Matter under discussion
GBC045	Cross river resilience	2.1.3 & 2.1.168	Claimed benefit of scheme is increased resilience on SRN but no analysis/modelling to show this is true in the event of major incidents.	Analysis requested. Disruptive events happen regularly – see DP World London Gateway WR REP1-331	Unlikely No response from the applicant
<b>EIA General (including REAC)</b>					
GBC046	Comprehensive Monitoring Strategy	2.1.61	Overarching consideration raised in numerous detailed points within SoCG.	For every topic area, as appropriate, an appropriate monitoring strategy and potential remedial actions for both construction and	Likely <a href="#">REP4.203</a> 9.90 Mitigation Route Map

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				operation phases. Overall reference document with specific commitments in DCO, control documents or s.106 as appropriate.	being analysed for gaps
GBC047	Comprehensive and interactive mitigation delivery strategy	2.1.62 & 2.1.66	Impact on AoNB and its setting from widening the A2.	National Highways agree and fund such a strategy.	Likely Fundamental point not addressed
GBC048	Impacts on landscape during construction	2.1.65	Size of the construction sites on east side of Gravesend impacts for a long period on the setting of the AoNB.	No obvious mitigation possible, compensation may be the only route.	To be discussed
GBC049	Cumulative and in combination impacts on local communities	2.1.67	Impact taken in combination on Riverview and Westcourt Wards.	Enhanced mitigation and compensation.	To be discussed
GBC050	Land reinstatement and vegetation	2.1.68	Speedy reinstatement and early planting where possible.	Commitment.	Matter agreed REAC LV002
<b>Socio-economic</b>					
GBC051	Use of local labour & implementation of SEE measures	2.1.69 & 2.1.70	Agreed skills and employment strategy with specific commitments and targets.	Clear implementation mechanisms. Subsequent discussions and announcement of a preferred bidder for the Kent roads contract may	Likely SEE implementation being discussed via the s.106 agreement or other mechanism.

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				enable progress to be made on these issues	Fresh proposals awaited.
GBC052	Southern Valley Golf Course	2.1.71	Loss of important leisure facility with no active recreation replacement.	Active leisure replacement.	Matter not agreed
GBC053	Shorne Wood Country Park access	2.1.72	Impact of Brewers Road closure both on local highway network and operation of the facility and what it supports.	Possible revenue support (matter for KCC) – but principal applies wider.	To be discussed KCC having discussions on potential revenue loss
GBC054	Business disruption and effect on Cascades Leisure Centre	2.1.73	Road closures / restrictions / noise / dust impact on outdoor and indoor activities, and business disruption (including access)	Potential revenue support for impacted businesses. Clear understanding of the implications for Cascades of all the phases of the construction process.	To be discussed – approach could follow that being discussed with KCC
GBC055	Community Fund (principle)	2.1.74 to 2.1.77	Support the broad principle but size of funding pot, criteria for grant distribution and operating mechanisms need to be reviewed.	Need to review scheme as recently advertised.	Community Fund implementation being discussed via the s.106 agreement or other mechanism.  Fresh proposals awaited.
<b>Air Quality</b>					

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GBC056	PM <sub>2.5</sub>	2.1.79	Need for monitoring of this pollutant that has no safe limit.	Further information sought on methodology used in ES and that new standard has been taken into account. May require additional monitoring solutions to be funded.	To be discussed
GBC057	Air quality mitigation	2.1.80	Long term monitoring strategy and potential actions. Predictions are in the context of concerns over LTAM development quantities GBC038.	Monitoring Strategy supported by multiple potential actions and access to the information.	Likely
GBC058	Local road network impact	DCO	Given concerns over LTAM development quantities etc, knock on impacts on LRN from greater traffic on SRN.	Fresh analysis taking the listed points into account.	Matter not agreed. Local road impacts discussed at ISH4 and ISH10 which revealed a fundamental disagreement between National Highways and most other interested parties
GBC059	Nature Conservation Impacts	DCO	Ammonia deposition and other pollutants impact on existing habitats and proposed planting.	Further information requested on ammonia model as there is no standard nationally.	To be discussed Note that Hole Farm is a Designated Funds project and not a mitigation for nitrogen

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					deposition impacts south of the river.
<b>Historic Environment</b>					
GBC060	Archaeological investigation	2.1.81	Ensure sufficient archaeological investigation of sites in advance of use.	KCC Archaeology satisfied with general approach, but Southern Valley Golf Course and nitrogen deposition mitigation sites need examination	Matter under discussion
GBC061	Setting of Heritage Assets	2.1.82 & 2.1.84	Detail of landscaping and other mitigation around the Thong Conservation area and implications for Cobham Park	Suitable solution to be developed Applicant rests on assessment in ES Chap 6. <a href="#">REP1-232</a> Gravesham LIR App.6 provides more information	Matter not agreed
GBC062	Cobham Estate (historic Darnley lands)	2.1.83	Failure to consider the wider heritage context of the proposal	Suitable solutions to be developed in heritage See above	Matter not agreed
GBC063	Methodology used in ES assessment	2.1.152	Confused methodology not applied correctly	Rewrite using consistent methodology See above	Likely See ExQ2 Q12.1.1

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GBC110	Missing archaeological investigations	2.1.153	Areas to the east of Gravesend including Nitrogen deposition sites and Southern Valley Golf Course	Programme of work	Matter under discussion
<b>Landscape and visual</b>					
GBC064	Major compensation package required	2.1.104 & 2.1.105	Combination of Landscape, Historic and Natural Environment impacts on the Cobham Estate.	Substantial funding covering the former Cobham Estate lands (with flexibility) for delivery of an overall comprehensive plan that needs to be developed  Note there is a study under way, funded by Designated Funds, by Kent Downs AoNB unit across the area	Likely  Understand discussions are occurring between Kent Downs AoNB unit and applicant. GBC clear that compensation should be provided in the general area where the impact occurs.
GBC065	Kent Downs AoNB	2.1.64 2.1.85, 2.1.87 & 2.1.89	Impact on Kent Downs AoNB (and Green Belt) and its setting from dramatically increased severance and urbanisation from project. Creates 12 lanes (14 if Park Pale included) with no vegetated central reservation, plus the loss of woodland on the north side to create the utilities corridor and hard surface for cycleway to the south of HS1 in Cobham Park.	The scheme should not proceed in principle.	Unlikely  Matter for ExA



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GBC066	Retaining existing planting and loss of HS1 planting	2.1.86 & 2.1.90	Maximise the retention of the existing mature planting (e.g. in sandwich lands between A2 and HS1).	Objective of scheme	Matter not agreed Applicant has yet to address this issue
GBC067	Visual intrusion of A2 junction	2.1.88	3 level junction in the setting of AoNB and visual intrusion for local residents as can be seen by the renderings from various viewpoints.	Mitigation strategy and detailed design	To be discussed Adequate visual representation not provided – see ExQ2 Q12.3.1
GBC068	Southern portal	2.1.91	Jarring landscape feature in view out over the Thames.	Mitigation strategy and detailed design.	To be discussed
GBC069	Road / landscape integration	2.1.92	Scheme has developed piecemeal (e.g. adding nitrogen sites compensation) and needs a comprehensive overview.	Mitigation strategy and detailed design.	Matter not agreed
GBC070	Woodland corridor north of A2	2.1.93	Striking a balance in the area north of Park Pale between tree cover, a more parkland like landscape and long distance views. Drainage pond and area east of Harlex site need to be integrated into the scheme.	Detailed design.	Matter under discussion
GBC071	Setting of Thong	2.1.94 & 2.1.95	Landscape around Thong is going to change significantly to the west due to the A122 cutting and its	Detailed design.	Matter not agreed

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			screening and to the east by proposed planting. As a conservation area with a number of non-designated heritage buildings the setting needs to be preserved so far as possible the open setting backed by woodland to the west (Claylane Wood) and the east (Shorne Woods).		
GBC072	Chalk Park	2.1.96	Design of Chalk Park, its function etc. Design Principles quoted include references to 'where reasonably practical' or similar which gives too much flexibility	Detailed design and recognition Chalk Park not delivered for many years.	Matter not agreed
GBC073	Shorne Ifield Road	2.1.97	Planting to south of Shorne Ifield Road (was to north).	Detailed design.	Matter not agreed
GBC074	Tilbury Fields	2.1.98	Views across river to new higher landscaping (NB: Shornemead Fort just designated a Scheduled Ancient Monument).	Visual intrusion and whether changes are justified by the wider context.	Matter not agreed
GBC075	New areas of planting	DCO & 2.1.37	General issues over establishment, maintenance impact of climate change, and the long-term management of new planting areas.	Long term maintenance plan and recognition that benefits only fully accrue when planting mature.	Matter under discussion

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GBC111	Assessment methodology	2.1.159	Changes to methodology and its application between 2020 and 2022 applications downgrading the impact	ExQ2 Q12.2.1	Matter under discussion Response by applicant awaited
<b>Terrestrial Biodiversity</b>					
GBC076	Environmental Impact of junction	2.1.99	More generally impact of loss of vegetation and time taken for new planting to establish.	Views after 15 years do not allow for fresh disturbance if the scheme is further developed over time.	Matter under discussion
GBC077	Hedgerow reinstatement	2.1.100	Retain existing field patterns – significant losses but also proposed net gains.	LSP.13 needs strengthening.	Matter under discussion
GBC112	Connection between impact and proposed mitigation/compensation	2.1.166	Clarity on what relates to what (NB separate to the need for a clearer overall strategy)	9.90 Mitigation Route Map needs further consideration	Matter under discussion
GBC078	Marsh restoration	2.1.101	Impact on North Kent Marshes from ground stabilisation tunnel and enhancements to habitat.	Possible actions if stated objectives are not achieved Addressable by monitoring strategy	Likely
GBC079	Effects on existing habitat replacement (CTRL)	2.1.102	Loss of HS1 landscaping in sandwich lands from M2 J1 to Marling Cross junction (including some from A2 widening).	Clear connection set out between what is lost and mitigation/compensation.	Likely

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GBC080	Utility corridor diversion impacts	2.1.103 & 2.1.149	Loss of ancient woodland even though reduced on what was originally proposed is still significant (Shorne Woods and Claylane Wood).	Compensation strategy clarity on replacement planting and ratios.	Likely
GBC081	Incremental changes and EMP	2.1.104	General concern at the lack of integration between various mitigation and compensation measures.	Drift to the design objectives and related processes in detailed design.	To be discussed
GBC082	EMP	2.1.105	Need a wider management plan for Cobham Estate area including ammonia sites.	Funding for this over and above what is being committed via Designated Funds to look at the concept of a Special National Nature Reserve. See GBC064 update	To be discussed
GBC083	Biodiversity net gain	DCO	Concern over loss of irreplaceable habitats (veteran trees and Ancient Woodland) and that south of the river biodiversity net gain is only 3% compared with 7% for project as a whole.	More biodiversity net gain south of the river.	Likely
<b>Noise, Vibration and Light</b>					

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GBC084	24 Hour working	2.1.106	Ensure minimal disturbance to local residents.	Construction detail.	See action points to ISH8
GBC085	Noise barriers removed	DCO	Reliance on use of low noise surface whose effectiveness decays with time. Concerns in context of LTAM modelling – see GBC038. Landscape benefit from their removal.	Undertaking on maintenance/replacement and potential mitigating actions. Further technical discussions.	To be discussed
GBC112	Noise from additional traffic flow on Henhurst Road	2.1.160	Increased flow on local roads	Falls within ambit of monitoring of local road impacts and taking action where appropriate	Matter under discussion
<b>Population and Human Health</b>					
GBC086	Timing, form, and function of replacement open spaces	2.1.107	When they will become available for use, what physical form they will take and what needs they are supposed to cater for and how the community can engage.	Agreed programme and process for reaching agreement on each areas form, function(s) and objectives.  No movement but longer explanation of Chalk Park	Nothing has been proposed but appreciate that detailed construction programme will be a major factor
GBC087	Construction impacts on PROW	2.1.108 & 2.1.112	PROW impacts information scattered but results in long term closures on the east side of Gravesend.	Access to Shorne Woods CP restricted and local dog walking forced into urban area.	To be discussed  ExA has requested plans to better understand the

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				Impact assessed in para 13.62 - 108 Gravesham LIR	construction impacts on PRow network
GBC088	Principle and design of PROW routes	2.1.109	Better understanding of routes in operational scheme but concerns over surfaces that may be used and the resulting urbanisation.	Need to ensure that surfaces are appropriate for a rural Green Belt setting, along with the AoNB and biodiversity considerations.	To be discussed
GBC089	Tilbury Ferry	2.1.110	Project provides an opportunity to enhance service during construction as a route between north and south of Thames construction sites and in the longer term to enhance sustainable transport. Ferry forms part of the construction travel plan.	Proposal for enhancing ferry service (hours of operation and Sundays).	Matter not agreed
GBC090	Cyclists and walkers crossing the River Thames	2.1.111	Active measures of support for walkers and cyclists to cross the river where none is currently proposed.	National Highways to make proposals other than existing facilities at Dartford. Applicant regards LA's as best placed to deliver – but will need funding	Matter not agreed
GBC091	Impact on NCN177	2.1.113	The temporary route is more indirect and less commodious than the current and the operational version is shorter but	Major rethink of proposals in both construction and operational phases.	Matter not agreed

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			still less commodious. Hard surface on temporary not acceptable due to impact on SSSI and historic park.		
GBC092	Assessment of cumulative effect on health	2.1.115	Many small impacts cumulate to be significant – and individuals have different susceptibilities (e.g. asthma suffers and dust). Need for monitoring.	Further information and agreement to monitoring strategy.	Matter under discussion
GBC093	Health Impacts Analysis – priorities and construction phasing	2.1.114, 2.1.116 & 2.1.117	Acceptance of the needs for overall monitoring of the impacts separately and in combination. The implications will depend on the vulnerability of individuals, which varies. Clearer construction timetable to understand length and severity of various operations. As a specific example, the implications for access and operation of primary schools.	Further information and agreement to monitoring strategy. More information on mitigation required in GBC s.106 Heads of Terms document – which needs to be translated into REAC	Matter under discussion
GBC094	Health Impact Analysis detailed comment from independent review	2.1.118 to 2.1.134	Series of detailed comments about presentation, data used, actual severity etc.	Awaiting detailed response. New material in revised SoCG asking us to make 2.1.115 to 134 'matter agreed'	Likely

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<b>Road Drainage and Water Environment</b>					
GBC095	AoNB perched water tables	2.1.135	Accept that seeking to avoid but need to understand what might be done if issues arise (e.g. Repton Ponds).	Part of the monitoring plan to explain how this is going to be considered and what action could be taken.	Likely
GBC096	Drainage attenuation ponds	2.1.137	Introduction of unnatural features into landscape.	Fuller detail of the landscaping and visual impact in the landscape. Applicant refers to APP-156	Matter not agreed Will have to be followed up at detailed design stage or amendment to Design Principles
GBC097	Flood risk assessment	2.1.164	FRA should be for 120 years as that is the design life of the tunnel.	Extended analysis.	To be discussed
<b>Climate</b>					
GBC098	Scale of analysis	2.1.138, 2.1.147 & 2.151	Request for analysis of carbon footprint to be done at Local Authority scale so implications for the Gravesham net zero target can be understood.	Analysis should be supplied. Use of hydrogen promoted	Matter not agreed
GBC099	Exemplar measures	2.1.139	Series of specific asks towards carbon neutrality.	Specific progress towards delivery asks noting that an exploration of using heat from the Thames Tunnel to heat the new Cascades	Likely



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				Leisure Centre is being examined via a Designated Funds funded project. This study did not proceed.	
GBC100	Construction carbon objective	DCO	Ambitious targets that may not be deliverable.	Clearer understanding of the risk factors to delivery and potential implications.	To be discussed
GBC101	Long term carbon footprint from operation	DCO	Compatibility with national carbon reduction targets and sustainable transport objectives not clear.	Taken with above are more realistic appraisal considering the role of transport in the overall national carbon budget and emerging government policy.	Unlikely
<b>Habitats Regulation Assessment</b>					
GBC102	HRA	2.1.140	Concern that the adverse effects have not been properly evaluated, especially if the modelled traffic flows do not cover reasonably expected development.	Further analysis of the implications on the basis of transport model run that fully considers reasonable levels of development in North Kent.	Matter for Natural England to agree. Council would still point to the potential impact from dog walking when access east of Gravesend is highly restricted during construction
<b>Nitrogen deposition</b>					

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GBC103	Site acquisition and Management	2.1.141	As further significant extension of land to be acquired and used by the scheme need to understand how NH will ensure the sites are properly managed and maintained	Understand how these relate to the other proposed planting areas and the wider ecology, landscape, heritage and other relevant factors impacting on the wider area	Matter not agreed
GBC104	Nitrogen mitigation planting sites	2.1.143	Ensure fit with landscape (inc. historic) and local SSSI ecology. Archaeological survey in advance of any works, existing biodiversity etc.	More detail to be clear how the sites fit with the adjoining habitats and those being compensated for	Matter not agreed
GBC105	Detail of proposed planting	2.1.144	How it relates to existing adjoining areas (often SSSI) but in a context of climate change and any specific functions for the site	More detail to be clear how the sites fit with the adjoining habitats and those being compensated for in terms of types of planting proposed	Matter not agreed
GBC106	Site selection	2.1.145	Process whereby sites were selected	Understand the logic more clearly. The sites suggested are greater north of the river, whereas the main impacts are to the south (including along the M2). It is not clear how Hole Farm addresses these issues in the wider context	To be discussed

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GBC107	Nitrogen deposition methodology	2.1.146	Clarity of the link between impacted sites and compensation sites	Understand the logic more clearly. See above	

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