

# Lower Thames Crossing 9.175 Applicant's comments on Interested Parties' responses to ExQ2 at Deadline 6

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## Lower Thames Crossing

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# 1 Introduction

## 1.1 Introduction

1.1.1 The Applicant has reviewed the submissions made by Interested Parties at Deadline 6 in response to the Examining Authority's Further Written Questions (ExQ2).

1.1.2 The Applicant has determined that in order to assist the Examining Authority and the Examination process, it would provide a response to submissions made in relation to the following topics:

- a. Topic 4: Traffic and transportation (Section 2 of this report)
- b. Topic 6: Geology and soils (Section 3 of this report)
- c. Topic 7: Tunnelling considerations (Section 4 of this report)
- d. Topic 8: Waste and materials (Section 5 of this report)
- e. Topic 9: Noise and vibration (Section 6 of this report)
- f. Topic 10: Road drainage, water environment and flooding (Section 7 of this report)
- g. Topic 11: Biodiversity (Section 8 of this report)
- h. Topic 13: Social, economic and land-use considerations (Section 9 of this report)
- i. Topic 16: General and overarching questions (Section 10 of this report)

1.1.3 Where a stakeholder response to a question is not identified below, the Applicant has no further comments to make at this stage.

1.1.4 The Applicant has not sought to provide a summary or extract of the Interested Parties' (IPs') responses to the relevant written question, to avoid repeating information or misrepresenting statements made by others. Instead, the Applicant has provided links to source documents for each response below.

1.1.5 The Applicant has no comments to make on the submissions made by IPs on the following ExQ2 topics:

- a. Topic 1: Project definition
- b. Topic 2: Climate change and carbon emissions
- c. Topic 3: Consideration of alternatives
- d. Topic 5: Air quality
- e. Topic 12: Physical effects of development and operation
- f. Topic 15: The acquisition and temporary possession of land and rights (CA & TP)

## 1.2 Signposting to other responses to Deadline 6 submissions

- 1.2.1 This document does not include responses to the following matters:
- a. Responses to post-event submissions by IPs. For information on this, refer to the Applicant's Responses to IP's post-event submissions at Deadline 6 [**Document Reference 9.177**].
  - b. Responses to other submissions at Deadline 6. For information on this, refer to the Applicant's Comments on IPs' submissions at Deadline 6 [**Document Reference 9.176**].
  - c. Any comments made on the draft Development Consent Order (dDCO), planning obligations, agreements and the adequacy of security. These have been covered in the Applicant's response to IPs' comments on the dDCO at Deadline 6 [**Document Reference 9.180**].

## 2 Topic 4: Traffic and transportation

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
ExQ2_Q4.1.1	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-167]</a></p> <p><b>Applicant's response:</b> As requested by the ExA, the Applicant has reviewed the answer submitted by Thurrock Council in response to ExQ2 4.1.1.</p> <p>The Council has prepared Figure 1 in its answer to ExQ2_Q4.1.1 within The Examining Authority's Written Questions and Requests for Information (ExQ2) – Thurrock Council Responses <a href="#">[REP6-167]</a> which shows the location of a number of developments along the A128 corridor to the north of the Orsett Cock junction, which has been tabulated in Appendix 1 of the same document. The Council has also reproduced Plate 4.3 of the Combined Modelling and Appraisal Report <a href="#">[APP-522]</a> which shows the development included in the Applicant's Uncertainty Log.</p> <p>The Council states "<i>This diagram [the Council's reproduction of Plate 4.3] shows that the developments presented in Appendix 1 are not assumed within the LTAM model, although in practice the traffic generated by these developments can be considered to be covered by the assumed growth in trips related with the application of NTEM. The new developments presented in Appendix 1 that may have a significant effect on traffic flows is small in number (a crematorium, a Road Planning Depot and car park and housing development of just over 150 dwellings), when coupled with the likely future emerging Local Plan growth does mean that the associated increase in traffic flows could be beyond that assumed in LTAM and this provides further support for the introduction of a monitoring and mitigation strategy at the Orsett Cock junction (and beyond)</i>".</p> <p>The Applicant's Uncertainty Log, as detailed in Chapter 4 of Combined Modelling and Appraisal Report – Appendix C – Transport Forecasting Package <a href="#">[APP-522]</a>, was compiled between 2016 and 30 September 2021. The Applicant also set out, at paragraph 4.1.12 of the same report, minimum size criteria for inclusion in the Uncertainty Log, given the volume of planning data received from the local authorities.</p> <p>The Applicant has examined the developments contained within Appendix 1 of the Council's response. The Council has split the listed developments into those classed as "significant applications that effect [sic] traffic impacts" and "minor applications with limited effects on traffic impacts". The latter lists an extensive number of applications, many of which are for non-material amendments, reserved matters applications, changes at</p>

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		<p>residential dwellings, applications related to protected trees and the like. The Applicant has not examined these further as development of this nature would not be included in an Uncertainty Log.</p> <p>In the former category, those that are classed as significant by the Council, nine developments are listed. Of these, one is listed as “invalid” and one (21/00508/OUT) is listed as refused on the Council’s planning portal. Of the remainder, three have application dates that are after 30 September 2021 so are not included in the Uncertainty Log. Of the remaining four applications, three are for residential dwellings, one for 6, one for 8 and one for 116 dwellings. As noted above, the Applicant has applied minimum size criteria, which for residential applications is 200 dwellings and as such these would not have been included in the Uncertainty Log.</p> <p>The remaining application is:</p> <ul style="list-style-type: none"> <li>• 19/01556/OUT – Kings Farm Parkers Farm Road, Orsett – 750 dwellings, medical facility, retail and commercial units.</li> </ul> <p>The Applicant acknowledges that this application has not been included within the Project’s Uncertainty Log, however, it is noted that the Council’s planning officer has recommended that the development be refused, most recently in July 2023<sup>1</sup>. If this development were, however, to be approved it would mean that trips to and from this proposed development are not explicitly included within the Lower Thames Area Model (LTAM). The Applicant agrees with the Council that “<i>in practice the traffic generated by these developments can be considered to be covered by the assumed growth in trips related with the application of NTEM</i>”. The approach to forecasting future year travel demand is set out in Section 6.3 of the Combined Modelling and Appraisal Report (ComMA) [APP-518].</p> <p>Overall, therefore, the Applicant does not consider that the flows assumed within the LTAM represent an underestimation of future flows. Traffic flows have been increased in general in the area by the TEMPro 7.2 growth factors.</p>

<sup>1</sup> <https://democracy.thurrock.gov.uk/mgConvert2PDF.aspx?ID=38991>

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ExQ2_Q4.1.4	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b>  <a href="#">[REP6-167]</a></p> <p><b>Applicant's response:</b>                      The Applicant has provided the Council with output from the full LTAM area in GIS shapefiles. The Applicant has also provided the Council with a cordon model of the LTAM that covers the whole of the Thurrock local authority area for every modelled year and time period.</p> <p>Table A.34 in the Combined Modelling and Appraisal Report Appendix D: Economic Appraisal Package: Economic Appraisal Report <a href="#">[APP-526]</a> presents the transport economic efficiency net benefits (TEE), mainly coming from the journey time savings and vehicle operating cost savings, by geographical area. Thurrock is forecast to receive 23% of the total net benefits from the Project, and has the greatest net benefit per head of population by a large margin of all the areas affected by the Project. Out of the total net benefits of £1,972,000,000 over 60 years in 2010 prices and values, £454,056,000 is associated with trips that start or finish in Thurrock, representing 23% of the total net TEE benefits.</p>

### 3 Topic 6: Geology and soils

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
ExQ2_Q6.1.2	Gravesham Borough Council	<p><b>ExQ2 response by stakeholder:</b>  <a href="#">[REP6-131]</a></p> <p><b>Applicant's response:</b>                      The Applicant refers Gravesham Borough Council to Responses to the Examining Authority's ExQ2 Appendix D – 6, 7, 8 <a href="#">[REP6-110]</a> which clarifies the process for the assessment of land contamination that has been undertaken. By adopting the Environment Agency land contamination risk management (LCRM) guidance<sup>2</sup>, the scenario analysed within the Environmental Statement (ES) and supporting appendices provides a robust and appropriate assessment of land contamination risk.</p> <p>With specific regard to the Southern Valley Golf Club and the former military airport (RAF Gravesend), these have been assessed as medium-risk potential sources of contamination; see ES Chapter 10 <a href="#">[APP-148]</a> and supporting appendices. In accordance with the principles of LCRM, the potential contamination sources designated as medium and high risk, were taken forward to the Remediation Options Appraisal and Outline Remediation Strategy <a href="#">[REP1-165]</a>. It is these potential medium and high-risk contamination sources that are referred to in ES Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan (CoCP) <a href="#">[REP6-038]</a> commitment GS001, that require supplementary ground investigation and risk assessment. The purpose of these supplementary investigations is to inform the detailed remediation design. This is in accordance with Stage 3 of the LCRM guidance to develop the site-specific remediation strategies and implementation plans required following the principles set in the Remediation Options Appraisal and Outline Remediation Strategy <a href="#">[REP1-165]</a> and this will be undertaken by the Contractor prior to the commencement of works. This is secured by REAC GS027 and is subject to development by contractors taking into account any representations received by the relevant local authorities. This is secured via Requirement 4 of the draft Development Consent Order <a href="#">[REP6-010]</a>.</p>

<sup>2</sup> Environment Agency (2023). Land contamination risk management (LCRM). <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>



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ExQ2_Q6.1.2	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b>  <a href="#">[REP6-167]</a></p> <p><b>Applicant's response:</b>                      In response to the second bullet point of Thurrock Council's response to ExQ2_Q6.1.2 (page 14 of 48) and the 'Geology and Soils' subsection of Thurrock Council's response to ExQ2_Q16.1.4 (page 45 of 48), regarding the request for a commitment in the Environmental Statement Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan (CoCP) <a href="#">[REP6-038]</a> for the monitoring of asbestos, the Applicant confirms that the wording of AQ006 has been amended at Deadline 7 to include provision for risk-based airborne asbestos monitoring.</p>

## 4 Topic 7: Tunnelling considerations

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
ExQ2_Q7.1.2	Port of London Authority	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-158]</a></p> <p><b>Applicant's response:</b> The Applicant acknowledges the PLA's comments regarding the apparent inconsistencies between the Deemed Marine Licence (DML) and the Register of Environmental Actions and Commitments (REAC) with regard to piling and underwater noise. To help address the concerns raised by the PLA, the Applicant has updated and aligned the 'Piling Techniques' section in the DML [<b>Document Reference 3.1 (9)</b>] and MB001 in the REAC, submitted at Deadline 7 [<b>Document Reference 6.3 ES Appendix 2.2 (7)</b>].</p> <p>Clause 15 in the DML previously read: <i>'15.—(1) Where a licensable marine activity involves piling the undertaker must comply with the requirements set out in sub-paragraph (2). (2) The requirements under sub-paragraph (1) are that— (a) works to construct the drainage pipeline and outfall referred to at paragraph 5(1)(a), including any piling, must not be undertaken when the work area is either fully submerged, or partially covered by water; (b) vibro-piling must be used until first refusal and impact piling must be used thereafter to toe in the piles; (c) where percussive piling is necessary, soft-start procedures are to be used to ensure an incremental increase in pile power, over a period of not less than 20 minutes until full operational power is achieved; and (d) where piling ceases for at least 10 minutes the soft-start procedures must be repeated.'</i></p> <p><b>Clause 15 in the DML now reads:</b> <i>'15.—(1) Where a licensable marine activity involves piling the undertaker must comply with the requirements set out in sub-paragraph(2). (2) The requirements under sub-paragraph (1) are that— (a) where reasonably practicable, works to construct the drainage pipeline and outfall referred to at paragraph 5(1)(a), including any piling, must be undertaken in the dry (and where such works are required in submerged or partially covered by water, paragraphs (b) to (c) of this sub-paragraph must be implemented);</i></p>

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		<p><i>(b) vibro-piling must be used until first refusal and impact piling must be used thereafter to toe in the piles;</i> <i>(c) where percussive piling is necessary, soft-start procedures are to be used to ensure an incremental increase in pile power, over a period of not less than 20 minutes until full operational power is achieved; and</i> <i>(d) where piling ceases for at least 10 minutes the soft-start procedures must be repeated.'</i></p> <p>MB001 in the REAC previously read: <i>'Works to construct the temporary drainage pipeline and outfall from the northern tunnel entrance compound, including any piling, must not be undertaken when the work area is either fully submerged, or partially covered by water where this would result in the transmission through the water column of noise and vibration or the generation of suspended sediments in accordance with the conditions set out by the Marine Management Organisation (MMO) in the Deemed Marine Licence.'</i></p> <p><b>MB001 in the REAC now reads:</b> <i>'Works to construct the temporary drainage pipeline and outfall from the northern tunnel entrance compound, including any piling, must where reasonably practicable be undertaken in the dry in accordance with the conditions set out by the Marine Management Organisation (MMO) in the Deemed Marine Licence.'</i></p> <p>The work area has been defined in Schedule 15 of the draft Development Consent Order (dDCO) <b>[Document Reference 3.1 (9)]</b>. Construction method statements will be submitted to the MMO for approval in line with paragraph 10 of the DML. Underwater noise and vibration effects in relation to tunnelling activities have been previously responded to in Responses to the Examining Authority's ExQ1 Appendix G: 11. Biodiversity (Part 1 of 6) <b>[REP4-194]</b>.</p>
ExQ2_Q7.1.5	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b> <b>[REP6-167]</b></p> <p><b>Applicant's response:</b> The Applicant has had further discussions on this matter with the Port of London Authority and has submitted some amendments to the outline Materials Handling Plan (oMHP) at Deadline 7 <b>[Document Reference 6.3 ES Appendix 2.2 Annex B (4)]</b>. These amendments are agreed with the PLA and represent a joint position.</p>

## 5 Topic 8: Waste and materials

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
ExQ2_Q8.1.3	Port of London Authority	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-158]</a></p> <p><b>Applicant's response:</b> The Applicant has engaged constructively with the PLA and can confirm the submission of an updated outline Materials Handling Plan at Deadline 7 [<b>Document Reference 6.3 ES Appendix 2.2 Annex B (4)</b>] which seeks to address the concerns highlighted. The Applicant understands the PLA is satisfied with these revisions but awaits formal confirmation.</p>
ExQ2_Q8.1.3	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-167]</a></p> <p><i>'It is the Council's opinion that the 'Baseline Commitment' in the oMHP has insufficient definition and should be supplemented by other binding commitments and that the 'Better than Baseline Commitment' does not represent a 'commitment'.'</i></p> <p><b>Applicant's response:</b> The Applicant has clearly defined the Better than Baseline Commitment as set out in paragraph 6.2.11 of Environmental Statement (ES) Appendix 2.2 Annex B: Outline Materials Handling Plan (oMHP) <a href="#">[REP5-050]</a>. The requirement to collaboratively engage with aggregate and material suppliers to maximise utilisation of river transport is a commitment. Additionally, handling of materials are required to be substantially in accordance with the commitments and principles in the oMHP <a href="#">[REP5-050]</a> as required under paragraph 1.1.2 and Requirement 4(3)(b) in Schedule 2 of the draft Development Consent Order <a href="#">[REP6-010]</a>. The Environmental Management Plan (second iteration) (EMP2) Materials Handling Plan for the North Portal construction area would have to demonstrate that the Contractor is maximising the use of the river, with only the exemptions listed being valid reasons for not being able to. This can be challenged by the Council when these are reviewed before being submitted to the Secretary of State.</p> <p><i>'Mechanisms for the transportation of cement are stated as being under review by the applicant within (applicant's response to the Council's LIR – refer to the five parts of the Applicant's responses: REP2-062 – REP2-066) and yet no commitment or incentivisation to the contractor is given.'</i></p>

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		<p><b>Applicant's response:</b></p> <p>The Applicant's decision to exclude cement from the river use commitment is grounded in the current lack of a detailed design at this stage. The precise specifications of the cement remain unknown, but it is anticipated to be a specialised type tailored for tunnelling works.</p> <p>Previous major projects, such as High Speed 1 (HS1) and Crossrail, illustrate the challenges associated with specific cement requirements. For instance, the high-specification cement necessary for HS1 was exclusively available from Ketton in the East Midlands, rendering river transport impractical. Similarly, Crossrail's cement was batched at Chatham Docks, with only certain components imported via the river. The Silvertown Tunnel project, for similar reasons, omitted cement from its commitment, opting for a high-specification CEM III-A cement. This cement was used to batch pre-cast segments in Ireland, then transported to the site via the road network.</p> <p>Committing to using river-imported cement at this stage would expose the Project to unnecessary risks. The unknown specifications pose a potential challenge, with the likelihood that they may complicate river transport or prove economically disadvantageous. Therefore, pragmatically, the Project opts for flexibility in cement sourcing to mitigate these uncertainties.</p> <p><i>'The applicant has referred to the absence of current detail on the construction programme as a reason for not being able to commit to certain movements but it avoids assigning aspirations within the frameworks of the oMHP, oSWMP and CoCP that the contractors should meet. To allow on-going innovation within the detailed design and construction period a derogation process could then be set to supplement the commitments and allow alternative opportunities to be used if they are found to be better for the environment or acceptably further reducing risk.'</i></p> <p><b>Applicant's response:</b></p> <p>The Applicant has provided a response to the matter of committing to specific transportation movements that are dependent on detailed construction phasing in its response to Thurrock Council's comments on ExQ1_8.1.6 in Applicant's Response to Comments Made by Thurrock Council at D4 and D5 [REP6-096].</p> <p>Given the absence of a detailed design, associated construction program and detailed earthwork strategy, the Applicant has adopted a proportionate approach. This approach retains flexibility to explore opportunities while implementing controls to mitigate impacts where reasonably practicable. Committing to specific routes or methods, which depend on detailed phasing of the works, and in absence of the detailed design, associated construction methodology and earthwork strategy could inadvertently create more issues than solutions. By maintaining appropriate flexibility, within the scope of the control document, the Applicant has</p>

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		<p>struck a balance between promoting efficient project delivery and the ability to minimise adverse impacts, should they arise, through avenues such as the Traffic Management Forum.</p> <p>In addition, the control plans have been developed in collaboration with regulatory bodies and local authorities. Using proven methods, the Applicant has taken good practices from projects of similar scale and complexity in the development of these control plans. The control plans are also supplemented by the inclusion of commitments outlined in the Register of Environmental Actions and Commitments (REAC) <a href="#">[REP6-038]</a> which specify targets and appropriate controlling limits, related to waste and material management.</p> <p><i>'The use of the existing jetties at East Tilbury is dismissed by the applicant but as also noted by the PLA, if those jetties are deemed unsuitable the applicant could have proposed modifications or new jetty provision, if it bought into the benefits of reducing road based transportation. This topic could have been considered early in the project definition if the applicant were minded to capitalise on the marine interface, instead it was convenient to dismiss the aspect and rely instead on road access. The applicant now concludes in its Written Statement that the absence of proximity of most compounds to the river is justification for not proposing to use marine or rail transportation .It could have considered, however, how to resolve the connectivity, such as using the trace later in the project, via the Tilbury Viaduct, once established.'</i></p> <p><b>Applicant's response:</b></p> <p>The Applicant thoroughly considered options for both repairing/refurbishing existing jetties and constructing new jetties. However, these alternatives were deemed unfeasible for several reasons, primarily due to initial discussions with key stakeholders such as the Environment Agency, Natural England, and the Marine Management Organisation. These discussions revealed significant challenges in proposing such a project due to the presence of nearby Ramsar designated land, functionally linked land, and potential interference with the river's operation and Port of Tilbury London Limited (PoTLL) activities.</p> <p>Simultaneously, PoTLL announced their expansion plans for the Freeport. Although detailed plans were not available, it was evident upon initial inspection that PoTLL would require riverfront land extending up to the Project's alignment. At that time, the Project's Order Limits extended further westward, resulting in an immediate and apparent clash with the Freeport's intentions.</p> <p>Considering the likelihood of a dispute arising over land allocation, it was clear that the PoTLL would have a compelling argument for needing the land urgently. Engaging in a dispute resolution process with the Department for Transport would be futile and time-consuming for all parties involved. Consequently, it was</p>

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		<p>mutually agreed that the Applicant would withdraw this land from the Order Limits, forfeiting any opportunity to construct riverside facilities in this specific area.</p> <p>It was evident that the existing basic facilities, represented by sunken barges serving as jetties, were fully utilised by the current operators in the management of excavated material imported from other projects.</p> <p>Furthermore, removing the use of the jetty for the reason stated above does not hinder the Project's capacity to fully exploit the river for material transportation. The Applicant considered the proximity and connectivity of other established river use facilities near the North Portal site, which has led to a commitment as set out in paragraph 6.2.9 of the oMHP <a href="#">[REP5-050]</a> to the use of port facilities.</p> <p><i>'In its responses to the questions and evidence raised during the Examination about improving the use of non-road transportation as a proportion of the construction process, the applicant seems to be focused only on the use of facilities at the Port of Tilbury but does not consider the broader use of marine or rail facilities which could reduce materials, plant or equipment mileage. The oMHP recognises only the 'final' mile aspect of a journey, but neglects both the first mile aspect of journeys and also that there are many export movements that should be considered for alternative solutions as well, e.g. exported earthworks or waste materials, including rejected concrete.'</i></p> <p><i>'The project has been driven by a road access strategy and this is highlighted by the Applicant not presenting to the Examination the River Transport Strategy that had been proposed earlier in the project development.'</i></p> <p><b>Applicant's response:</b></p> <p>The oMHP, which is an outline document securing several commitments on this matter, actually focuses on various pieces of infrastructure and material transport solutions, with the ultimate aim of minimising effects from vehicle movements. For example, paragraph 3.4.13 of the oMHP <a href="#">[REP5-050]</a> states that <i>'the Project would seek to reduce vehicle miles travelled using a combination of modes of transport...'</i>, realising that not all Project compounds are situated on, at or adjacent to the river. In fact, only 13% of the Project is on, at or adjacent to the river. The notion that <i>'the oMHP recognises only the 'final' mile aspect of a journey...'</i> is wholly untrue. Consideration has been given to the movements from likely source locations (see Section 6.2 in the oMHP) to the end destination compounds. The Applicant's current understanding of the local supply chain identifies several material delivery hubs that deliver material via river and/or rail with onward transportation to the Project's compound via the road network. This multimodal transport approach to transporting material from its source to the recipient compounds promotes a sustainable deliverable position.</p> <p>The considerations adopted by the Applicant to assess the feasibility of importing materials via the river are detailed in paragraph 6.2.12 of the oMHP. These considerations include factors such as the proximity of</p>

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		<p>suppliers, whether they are national or international, as well as the accessibility of the compound from the river, among other relevant aspects. Another key aspect was whether there are any restrictions or specialist requirements which would limit the number of potential suppliers, as in the case of cement. Annex B.1 and Annex B.2 of the oMHP lists out this very exercise on the ability of various existing suppliers that could be used by the Project and includes those that are on the river, related to rail depots or land locked but near the Project.</p> <p>The Council's comments on waste and excavated material movements can be addressed by highlighting that the Applicant's waste management strategy, in ES Appendix 2.2 Annex A: Outline Site Waste Management Plan <a href="#">[REP6-040]</a>, is firmly rooted in the principles of circular economy and following the waste hierarchy. By adhering to these principles, the Applicant has effectively kept the majority of excavated materials within the Order Limits, significantly reducing the need for offsite management and disposal. Provisions outlined in the waste impact assessment, in ES Chapter 11: Material Assets and Waste <a href="#">[APP-149]</a>, account for materials that cannot be reused on site or placed within the IVL receiver site located within the Order Limits, particularly those classified as hazardous, amounting to an estimated 154,000m<sup>3</sup> at the North Portal construction area over a 2-3 year period.</p> <p>In determining the appropriate means of transporting inert or non-hazardous waste offsite, the Applicant has evaluated potential receiver sites, considering the type and quantity of materials expected to be delivered. This evaluation incorporates a comprehensive screening criteria set out in ES Appendix 11.1: Excavated Material Assessment <a href="#">[APP-435]</a>. The screening criteria encompass various elements, including the operational period, acceptable waste streams, site capacity, permit and planning status, proximity to the local area, and transport capabilities, encompassing river and rail transport.</p> <p>At the North Portal site, where offsite disposal is unavoidable, a small percentage of the material is anticipated to be hazardous, necessitating placement within a specifically designated receiver site capable of handling such materials. When considering the use of rivers, taking into account the material type and permitted sites, only one site within the 20km study area aligns with the screening criteria for accepting hazardous soils for treatment (Rainham Marshes).</p> <p>Through this approach, the Applicant is confident that there is a robust mechanism that promotes a waste management mechanism for identifying receiver sites, which actively promotes the use of suitable sites by implementing the screening criteria (commitment MW012 in the REAC <a href="#">[REP6-038]</a>). This method ensures a balanced consideration of factors such as capacity, waste stream, and transportation capabilities, with positive scoring for river and rail options where feasible.</p>



ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p><i>'If the applicant had considered from the start of the project the use of marine and rail as an important aspect of the minimisation of impacts, then an alternative compound strategy could have been adopted at the early planning stage to improve access long the trace and to marine or rail facilities.'</i></p> <p><b>Applicant's response:</b></p> <p>The Applicant firmly disputes the assertions that considerations for the connectivity of other transportation modes have been neglected in the approach to compound locations and access arrangements. Section 8 of the oMHP <a href="#">[REP5-050]</a> outlines the capacities of the local existing rail and marine infrastructure in relation to serving the Project. In this review, the locations of compounds and their accessibility to marine and rail infrastructure have been looked at not in isolation but collaboratively, to gain the benefits of alternative transportation methods beyond the road network. The inherent proximity of the Project to existing marine and rail infrastructure, coupled with limitations and impracticalities on constructing new infrastructure for the Project, underlines the necessity for a multimodal delivery approach, as detailed in the oMHP <a href="#">[REP5-050]</a>.</p> <p>As part of a multimodal strategy, the Applicant has adopted an approach to minimise the impact on the local road network when determining suitable access routes to compounds. Despite constraints imposed by the proximity of the strategic road network, the Applicant's compound strategy has successfully positioned the majority of compounds (11 out of 17) to be accessed via the strategic road network or well-established A-roads, such as A226, A1013, and A1089. Instances where the local road network is utilised stem from either the impracticality of using the strategic road network due to distance or as a temporary measure to establish access before constructing an access route off the strategic road network when setting up the compound.</p> <p>To minimise reliance on the local road network, the following principles have been adopted as set out in paragraph 4.1.3 of the outline Traffic Management Plan for Construction (oTMPfC) <a href="#">[REP6-048]</a>:</p> <ul style="list-style-type: none"> <li>• Early construction of temporary offline haul routes directly off the SRN where practicable</li> <li>• Maximum use of internal haul routes, when available, to gain access to worksites</li> <li>• Engagement with local businesses to establish access via private roads</li> </ul> <p>The illustrative access routes provide a solid foundation for the Contractor to adopt and further refine, as necessary, within the requirements of the oTMPfC <a href="#">[REP6-048]</a>. These access routes would be set out in the Traffic Management Plan and will be developed through the mechanism of the Traffic Management Forum, involving working with relevant stakeholders.</p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
ExQ2_Q8.1.4	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b>  <a href="#">[REP6-167]</a></p> <p><b>Applicant's response:</b>                      In regards to comments raised on the enforcement of a cap on excavated material taken offsite in ExQ2_Q8.1.4, the Applicant has responded to this matter in its response to Thurrock Council's comments on ExQ1_8.1.2 in Applicant's Response to Comments Made by Thurrock Council at D4 and D5 <a href="#">[REP6-096]</a>.</p>

## 6 Topic 9: Noise and vibration

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
ExQ2_Q9.1.1	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-167]</a></p> <p><i>'The Council welcomes the additional commitment (NV018) in the Code of Construction Practice/REAC. However, given that potentially eligible buildings need to be determined no later than six months after the highway has opened to the public (Section 6, paragraph 3 of the Noise Insulations Regulations 1975), the Council do not agree with the timings proposed in NV018. The Council requires that the timescales for undertaking the assessment are completed within six months of the highway being opened to the public.'</i></p> <p><b>Applicant's response:</b> In response to the issues raised by Thurrock Council with regard to ExQ2_Q9.1.1, an alteration to REAC commitment NV018 within Environmental Statement (ES) Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan (CoCP) <a href="#">[REP6-038]</a> will be made to accord with the Noise Insulations Regulations 1975 Section 6, paragraph 3, referencing "within six months of the Project opening". The amendment to REAC commitment NV018 will be submitted at Deadline 7 <b>[Document Reference 6.3 ES Appendix 2.2 (7)]</b>.</p>
ExQ2_Q9.1.3	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-167]</a></p> <p><i>'In the event of exceedances of noise/vibration limits during the construction phase, NV015 states that these will be investigated by the contractor and best practicable measures will be employed with mitigation put in place. In the event that best practicable measures are not sufficient to attenuate noise/vibration impacts in line with the limits agreed in the Section 61, the Council request that 'a scheme for the installation of noise insulation or the reasonable costs thereof, or a scheme to facilitate temporary rehousing of occupants, as appropriate, will be implemented and included in the REAC.'</i></p> <p><b>Applicant's response:</b> In response to the issues raised by Thurrock Council with regard to ExQ2_Q9.1.3, an alteration to REAC commitment NV015 within ES Appendix 2.2: CoCP <a href="#">[REP6-038]</a> will be made to include the wording "a scheme for the installation of noise insulation or the reasonable costs thereof, or a scheme to facilitate</p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p><i>temporary rehousing of occupants, as appropriate, will be implemented</i>". The amendment to REAC commitment NV015 will be submitted at Deadline 7 [<b>Document Reference 6.3 ES Appendix 2.2 (7)</b>].</p> <p><i>'As part of the Outline Traffic Management Plan for Construction (oTMPfC), a noise assessment will be undertaken to determine the change in noise levels at noise sensitive receptors. Where impacts are predicted to result in moderate or major changes in noise levels, alternative routes for construction traffic will be considered. The results of the noise assessment and full justification for the preferred routing will be provided for approval to the relevant Local Planning Authority'</i></p> <p><b>Applicant's response:</b></p> <p>In response to Thurrock Council's suggested REAC item relating to a noise assessment being undertaken as part of the oTMPfC [<a href="#">REP6-048</a>] to inform construction routes, the Applicant refers the Council to the response at Comments on LIRs Appendix H – Thurrock Council (Part 3 of 5) [<a href="#">REP2-064</a>], pages 18-20.</p> <p>The construction traffic impacts on the wider road network are temporary in nature, only occurring for the duration of the works in that area. As detailed within the ES Chapter 12: Noise and Vibration [<a href="#">APP-150</a>] significant impacts associated with construction traffic have been identified but these predominantly occur on local roads around the Project, where the existing flows are low; as detailed on ES Figure 12.2: Construction Traffic Noise – Affected Links [<a href="#">APP-310</a>].</p> <p>Specific control of construction traffic noise is implemented through active monitoring and management of flows around the network, allowing route changes and other control measures such as speed limit directions to be implemented to alter flow patterns of construction traffic where problems are identified. This would be managed through measures in the outline Traffic Management Plan for Construction (oTMPfC) [<a href="#">REP6-048</a>].</p> <p>The oTMPfC provides a framework that would apply to the design, management and communication of construction traffic management. It sets out how the Traffic Management Plans (TMPs) will be determined and developed by the Contractors through consultation with all relevant stakeholders via the Traffic Management Forum. Additionally, the oTMPfC sets out the minimum requirements the TMP would address for each stakeholder category, i.e. residents, businesses, schools etc., set out in Table 2.3. This approach offers a robust framework for developing the TMP in consultation with relevant stakeholders, as the details associated with the construction methodology develop.</p> <p><i>'NV017 covers vibration and specifically mentions piling with additional assessments submitted as part of a Section 61 application. However, the Council requests that, if used, 'vibratory rollers' are included as part of any assessments that form part of the Section 61 application.'</i></p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p><b>Applicant's response:</b></p> <p>In response to the issues raised by Thurrock Council with regard to ExQ2_Q9.1.3, an alteration to REAC commitment NV017 was included at Deadline 6 within ES Appendix 2.2: CoCP [REP6-038] to cover vibratory compaction rollers and vibration from construction activities more generally.</p>
ExQ2_Q9.1.4	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b></p> <p>[REP6-167]</p> <p><i>'Following implementation of mitigation measures including noise barriers and low noise road surface corrections, representative operational sound surveys will be undertaken to confirm that operational noise levels are in accordance with those reported in the ES. If following the surveys there are significant differences between the operational sound survey and those reported in the ES, resulting in increases in noise levels, additional mitigation measures would need to be reviewed. The results and any further mitigation measures will be reported and submitted to the Local Planning Authority for approval'</i></p> <p><b>Applicant's response:</b></p> <p>Through the implementation of embedded mitigation earthworks and specific acoustic mitigation in the form of low noise surfacing and acoustic fencing provision, the Project would meet the aims of the National Policy Statement for National Networks (NPSNN)<sup>3</sup>, defined within the context of Government policy on sustainable development in relation to noise. These are defined around the principles of avoiding significant impacts on health and quality of life and mitigating adverse impacts to a minimum in the context of sustainable development.</p> <p>The Applicant's approach to operational noise monitoring is outlined within paragraphs 12.8.5 to 12.8.8 of ES Chapter 12: Noise and vibration [APP-150] and does not propose to undertake monitoring to confirm how operational noise levels relate to those reported in the ES, as noise monitoring can be affected by other noise sources. Whilst physical monitoring of noise levels as a means of verification will not be undertaken as part of the Project, the performance specification of specific operational mitigation measures would be confirmed at preopening stage and is secured under REAC commitment NV019 within ES Appendix 2.2: CoCP [REP6-038]. This would involve undertaking visual surveys to ensure the mitigation secured through NV011 Acoustic Barriers is installed correctly. A review of installation specifications would be undertaken (Highway Authority Product Approval Scheme Certification, sound reduction index performance certification) to ensure the</p>

<sup>3</sup> Department for Transport (DfT) (2014). National Policy Statement for National Networks.

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p>performance assumptions in the ES assessment, secured under REAC commitment NV013 Road Surfacing, are achieved by the products installed onsite.</p> <p>By the end of the construction, commissioning and handover stage of any part of the Project, the Contractors will have developed the Handover Environmental Management Plan (EMP), i.e. the third iteration of the EMP (EMP3). EMP3 will detail maintenance and monitoring activities throughout the operational phase having regard for the specific mitigation measures identified within the REAC as well as operating procedures of National Highways, the local authority and local highway authority including commitments outlined above. This is set out in Section 6.13 of the CoCP <a href="#">[REP6-038]</a>.</p>

## 7 Topic 10: Road drainage, water environment and flooding

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
ExQ2_Q10.1.2	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b>  <a href="#">[REP6-167]</a></p>
		<p><b>Applicant's response:</b>                      In relation to the Council's response to ExQ2_Q10.1.2 it is clarified that the proposed infiltration-based operational drainage infrastructure has been designed using the results of ground investigation data and would be subject to routine inspection and maintenance to ensure its long-term performance. This is secured through commitment RDWE012 in the Code of Construction Practice (CoCP), First Iteration of Environmental Management Plan v6.0 <a href="#">[REP6-038]</a>.                      It is therefore considered that there are no additional risks of overtopping of infiltration drainage features comparative to the retention ponds included in the design. Exceedance routing, flow paths and extents would be confirmed during the detailed design, as secured by commitment RDWE034 in the CoCP <a href="#">[REP6-038]</a>.</p>
ExQ2_Q10.1.4	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b>  <a href="#">[REP6-167]</a></p>
		<p><b>Applicant's response:</b>                      In response to Q10.4.1, the Applicant has developed the operational drainage design in the context of known constraints. There are no catchments and associated outfalls that have any additional known challenging constraints. However, the potential for variations to the number and location of proposed outfalls cannot be confirmed until the detailed drainage design is progressed.</p>

## 8 Topic 11: Biodiversity

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
ExQ2_Q11.1.2	Port of Tilbury London Limited	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-162]</a></p> <p><b>PoTLL comment:</b> <i>'The proposals suggested in the Applicant's response to question Q11.5.2 do not provide a robust method of monitoring the success of species mitigation proposals. For protected species groups where mitigation is subject to licensing (e.g. bats and great crested newts (GCN)), licensing obligations will ultimately require monitoring information to be reported to Natural England. However, no such provision has been made for species groups that do not benefit from licensing (such as the four species of reptile present) or from specific legislative protection (such as invertebrates and breeding birds). In particular, the Applicant's reptile translocation and mitigation strategy does not appear to be documented within the oLEMP [REP3-106], other than to say that habitat will be created for reptiles in various locations throughout the Order Limits; and at paragraph 8.22.9, that all areas of open mosaic habitat will "be a receptor site for translocated species including amphibians and reptiles". However, given that the Tilbury Fields area already contains baseline populations of reptiles that will, presumably, be translocated off-site before construction of 'Tilbury Fields' can commence, it is unclear how 'Tilbury Fields' could itself be used as a reptile receptor.</i></p> <p><i>It is also unclear how the Applicant would make 'open mosaic habitats' suitable at their inception to accommodate all relevant species. For example, it does not appear possible for habitat to be made suitable for early-successional invertebrate communities of bare ground and open short-sward habitats, whilst at the same time being suitable for reptiles (which require an established vegetation structure)? <b>Further clarification is required from the Applicant on its reptile and invertebrate mitigation strategies (including receptor locations and phasing), and the monitoring of their success.</b></i></p> <p><i>This is relevant to PoTLL in the context of understanding the future distribution of reptile and invertebrate populations in this locality, and to inform future reptile and invertebrate mitigation strategies for the Thames Freeport area.'</i></p> <p><b>Applicant's response:</b> The Applicant has discussed monitoring the success of species mitigation proposals with Natural England and as a result, has updated the outline Landscape and Ecology Management Plan (oLEMP) <b>[Document Reference 6.7 (5)]</b>, submitted at Deadline 7, to include reference in Section 4 that success criteria will be</p>



ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p>refined at detailed design, including consideration of key species groups in assessing ecosystem function. Further discussions with Natural England around the structural composition of Open Mosaic Habitat have also led to an amendment within the oLEMP, and mirrored in the Design Principles [<b>Document Reference 7.5 (5)</b>], which would provide some flexibility in this at each location proposed for this habitat typology. This flexibility would allow detailed design to further target the habitat structure to the key species associated with each management area within the oLEMP.</p> <p>A reptile mitigation strategy will be provided during detailed design once pre-construction surveys have been undertaken. Where reptile receptor sites have been identified, these will only be used once a full inspection has been carried out by a suitably qualified Ecological Clerk of Work (ECoW) to ensure that the habitat is sufficiently established to provide appropriate carrying capacity for animals translocated there. This is secured in the Register of Environmental Actions and Commitments (REAC) within the Code of Construction Practice First iteration of Environmental Management Plan (CoCP) [<a href="#">REP6-038</a>], REAC commitment TB017 <i>“Where protected species licences are not required, the approach to habitat clearance and the potential need to trap and translocate non-licensable species (reptiles and/or native amphibians species excluding GCN) to established receptor sites with sufficient carrying capacity would be determined and undertaken by the Environmental Clerk of Works. Where translocation occurs, species will be only be translocated to receptor sites with established habitat”</i>. Tilbury Fields is not proposed as a receptor site for translocated animals as the timing of habitat establishment there would not align with the required translocation timescales.</p> <p><b>PoTLL comment:</b></p> <p><i>‘The oLEMP refers at Section 6.3 to ‘Tilbury Fields’ and states that the management requirements are as follows:</i></p> <p><i>“a. to establish a mosaic of open habitat which would provide high quality habitat for a range of invertebrate assemblages. This area along the northern edge of the Thames Estuary supports nationally important assemblages of terrestrial invertebrates including key species such as the shrill carder bee. The creation of high quality habitat in this area would strengthen links between existing high quality habitats in this area. The relevant typology planting proposals include species specifically to support these invertebrate assemblages.</i></p> <p><i>b. habitat present would be rough grassland, and patches of bare earth, with scrub. Habitat would be planted as a patchwork rather than large areas of similar habitat.</i></p> <p><i>c. to provide hibernacula and refuges for invertebrates, reptiles and amphibians around the site, based on good practice guidance designs (English Nature, 2001).</i></p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p><i>d. to utilise the varying substrates from the excavated material from the tunnels to create a patchwork of various habitat types.</i></p> <p><i>e. to manage areas within Tilbury Fields on a rotational basis to encourage diversity in the habitats and to create a dynamic, changing landscape, reflective of the surrounding area.</i></p> <p><i>f. to avoid the grassland turning into 'rank' grassland, the grassland areas and slopes to be mown in a 'random' manner and not a clear annual cut.</i></p> <p><i>g. to avoid large homogenous grass plains.</i></p> <p><i>h. to provide uneven slope profiles on the circular mounds, and provide differing levels of insolation.</i></p> <p><i>i. Appropriate slope faces to be designed with steps and deploying fill materials at varying depths to keep the sward height down and avoid turning into 'rank grassland'.</i></p> <p><i>j. to include series of 30cm hillocks to increase biodiversity value.</i></p> <p><i>k. to provide signage and interpretation boards to allow public to learn and understand the importance and value of Open Mosaic Habitat. The habitat itself can appear unsightly and can often appear 'neglected'.</i></p> <p><i>l. To provide signage and interpretation boards to inform public to sensitivity of overwintering birds on the Thames Foreshore to human disturbance.</i></p> <p><i>m. To ensure signage and interpretation boards are suitably robust to minimise need for frequent replacement.</i></p> <p><i>n. Scrub planting to be managed to help strengthen the geometric form of the earthworks."</i></p> <p><i>Section 8.22 of the oLEMP goes on to describe that the measures of success used for monitoring the Tilbury Fields will align with the Biodiversity Net Gain (BNG) criteria used for 'Open Mosaic Habitat on previously Developed Land' habitat condition assessment, as follows:</i></p> <p><i>"8.22.13 To ensure that the management requirements outlined previously are achieved, the following monitoring targets have been devised to measure the success of the management requirements:</i></p> <p><i>a. Varied vegetation structure, with a single structural habitat component or vegetation type not accounting for more than 80% of the total habitat area.</i></p> <p><i>b. A diverse range of flowering plant species are present which include native, non-native but beneficial to wildlife or non-native sedum plants.</i></p> <p><i>c. Invasive non-native species cover less than 5% of the total vegetated area.</i></p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p><i>d. The site shows spatial variation, forming a mosaic of at least four early successional communities (a) to (h) plus bare substrate and pools. (a) annuals; (b) mosses/liverworts; (c) lichens; (d) ruderals; (e) inundation species; (f) open grassland; (g) flower-rich grassland; (h) heathland.</i></p> <p><i>e. Establishment of open mosaic habitat in accordance with the structural composition specified within the Design Principles.</i></p> <p><i>f. Establishment of floral species composition in line with planting palette set out within Design Principles.</i></p> <p><i>g. Colonisation by diverse invertebrate species assemblage typical of open mosaic habitat along the Greater Thames Estuary National Character Area.</i></p> <p><i>h. Pond creation in line with design approach in Great Crested Newt Mitigation Guidelines (English Nature, 2001).”</i></p> <p><i>However, by taking the entirety of the ‘Tilbury Fields’ as a single assessment unit (which appears to be the case by reference to the Applicant’s BNG metric shapefiles), the requirements to deliver the criteria above, particularly spatial variation (as per item d above), and colonisation by a diverse brownfield invertebrate community (as per item g above), are reduced to almost meaningless thresholds. This is because it is inevitable that there will be some spatial variation and invertebrate presence over an expansive landform of approximately 45ha (see paragraph 2.4.180 of the Project Description [APP140]). A more ecologically-robust approach would be to subdivide Tilbury Fields into various management sub-compartments, and to ensure that the objectives for habitat variation, etc., are met in full within <b>each</b> of the sub-compartments.</i></p> <p><i>Furthermore, it is unclear how criterion (g) (i.e. ‘Colonisation by diverse invertebrate species assemblage typical of open mosaic habitat along the Greater Thames Estuary National Character Area’) would be measured, noting that the Applicant’s baseline invertebrate surveys were deemed so inadequate that data<sup>3,4</sup> provided by the Port of Tilbury London Ltd to the Applicant has instead had to be relied upon by the Applicant to inform its consultation with Natural England. Given the inadequacy, in the view of the relevant statutory nature conservation body, of the Applicant’s baseline data [APP-392], it would be unsustainable for this to represent the baseline to which future monitoring data is compared. Given the current use of PoTLL’s data, it would not be unreasonable for future monitoring of Tilbury Fields to follow the same protocol as the invertebrate survey provided by PoTLL (Telfer 2023), and for monitoring to seek to establish whether the level of baseline interest recorded by Telfer in 2022 has recolonised to an equivalent extent within Tilbury Fields.</i></p> <p><b><i>The Applicant is therefore requested to (a) detail and justify how the Tilbury Fields area will be subdivided for BNG monitoring purposes, and (b) detail and justify the protocols that will be followed in</i></b></p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p><b><i>undertaking invertebrate monitoring.</i></b> <i>This is relevant to PoTLL in the context of understanding future distribution and status of invertebrate populations in this locality, and to inform future invertebrate mitigation strategies for the Thames Freeport area.'</i></p> <p><b>Applicant's response:</b></p> <p>The outline Landscape and Ecology Management Plan [REP4-140] sets out high level description and management requirements for each of the management areas, which vary in size and complexity. This provides the outline for more detailed proposals for each management area which will be developed during detailed design and in discussion with the advisory group and may involve subdivision of larger areas if considered appropriate. A revised outline Landscape and Ecology Management Plan will be submitted at Deadline 7 [Document Reference 6.7 (5)] and includes reference to success criteria which will be refined at detailed design, including consideration of monitoring key species groups to provide an assessment of ecosystem functionality. A key stated objective of the Tilbury Fields management area is to establish a mosaic of open habitats which provide high quality habitat for a range of invertebrate assemblages. This key objective, and the outline approach to achieving it, has been discussed at length with Natural England and their support for it is reported within the Statement of Common Ground (SoCG) between National Highways and Natural England in items 2.1.50 to 2.1.55 [REP5-038].</p> <p>The Applicant does not recognise the statements made by PoTLL regarding any inadequacies in its baseline for terrestrial invertebrates, particularly that this is the view of the "relevant statutory nature conservation body". The Applicant has engaged positively with Natural England throughout the Project's development regarding the baseline, assessment and mitigation proposals for terrestrial invertebrates and this is reported within the SoCG between National Highways and Natural England [REP5-038], particularly in Items 2.1.46, 2.1.47, 2.1.48, and 2.1.49. Regarding the use of third-party data, the PoTLL survey data was reported in 2023 and provided to the Applicant on 4 July 2023, after the start of the Examination, so it would not have been possible to include this information as part of the Project's baseline. This information does not affect the robustness of the application but is now being used to help inform detailed design. This approach of using the most up-to-date information available during the detailed design phase of the Project is recognised good practice which the Applicant is committed to follow both as a requirement of the draft DCO (Requirement 7 [REP6-010]) and within the CoCP [REP6-038], which secures the provision of Ecological Clerks of Works to supervise construction activity, identify areas of ecological sensitivity and provide appropriate mitigation (REAC commitment TB006). As reported in the SoCG [REP5-038] at Item 2.1.103, the Applicant is using the PoTLL data to work with Natural England in the production of a heat map identifying key areas of terrestrial</p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		invertebrate habitat around the North Portal area. This heat map will be appended to the SoCG which will be submitted at Deadline 8.
ExQ2_Q11.2.2	Port of Tilbury London Limited	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-162]</a></p> <p><b>PoTLL comment:</b> <i>'The Applicant's proposed removal of ditch W030 (JN1) and replacement of ditch W021 with the "Tilbury Main culvert" could potentially result in water vole population fragmentation effects that could compromise the effectiveness of PoTLL's Tilbury2 water vole receptor site (and future water vole mitigation measures) via a reduction in landscape scale habitat connectivity.</i> <i>If the Applicant were to reduce the extent of culverting, then PoTLL's land would remain better connected for water voles, thereby increasing the success of any future water vole mitigation delivered by PoTLL within its landholdings. As part of the package of ecological mitigation provided for Tilbury2, PoTLL has delivered extremely high-quality and successful compensatory water vole habitat. <b>PoTLL would like to receive assurances from the Applicant that the installation of the proposed "Tilbury Main culvert" will not inhibit future prospects for water vole mitigation delivery in the Tilbury Freeport area.'</b></i></p> <p><b>Applicant's response:</b> The details of and requirement for the culvert at West Tilbury Main are described in the response to ExQ2_Q11.2.1. The impact of fragmentation of the West Tilbury Main on water vole is described in both Section 3.3 of Environmental Statement (ES) Appendix 8.20: Draft Water Vole Conservation Licence Application <a href="#">[APP-416]</a>, and paragraph 8.6.395 of ES Chapter 8: Terrestrial Biodiversity <a href="#">[APP-146]</a>. Monitoring of the use of the West Tilbury Main culvert by water voles will be carried out as described in paragraph 6.1.5 of ES Appendix 8.20: Draft Water Vole Conservation Licence Application <a href="#">[APP-416]</a>. It is not possible or appropriate for the Applicant to comment on the efficacy of future water vole mitigation strategies which may be proposed as part of the Tilbury Freeport area as no details have been provided. However, the conclusions of the Applicant's assessment of likely significant effects to water vole from the Project are that it would not result in adverse impacts which could affect the integrity of the population in this area. The Applicant is of the view that a suitably robust and precautionary approach to water vole mitigation for the Freeport can be developed independently of the Project's water vole mitigation strategy.</p>

## 9 Topic 13: Social, economic and land-use considerations

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
ExQ2_Q13.1.2	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b> [REP6-167]</p> <p><b>Applicant's response:</b> The Applicant acknowledges the comments from Thurrock Council regarding ExQ2_13.1.2. As set out in the Applicant's own response to ExQ2_13.1.2 [REP6-116], while there are a number of elements that could be considered 'appropriate' development in their own right, the Applicant has adopted the precautionary position that the whole Project should be considered as 'inappropriate' development in the Green Belt. The Applicant has considered the case for very special circumstances on that basis.</p> <p>The Applicant has also provided further detail on the assessment of the effect of the Project on the purposes and openness of the Green Belt in response to ExQ2_13.1.3 at Deadline 7 [Document Reference 9.172]. This provides more detail in relation to, but does not change the conclusions of, Section E.6 of Planning Statement Appendix E [APP-500] and the conclusion that very special circumstances are present in this case.</p>

## 10 Topic 16: General and overarching questions

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response		
ExQ2_Q16.1.4	Port of Tilbury London Limited	<b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-162]</a>		
		<b>PoTLL commentary on Register of Environmental Actions and Commitments (REAC) commitments:</b>		
		<i>REAC ref no,</i>	<i>Commitment</i>	<i>Comments from PoTLL</i>
TB001	<i>Hedgerow habitat lost during construction would be compensated by creating new hedgerows at locations shown on the Environmental Masterplan (Figure 2.4, Application Document 6.2), using native species of local provenance. Planting would be undertaken as early in the construction programme as reasonably practicable, having regard for the completion of potentially damaging construction activities within and adjacent to the planting area, and seasonal requirements for planting.</i>	<i>The Applicant's baseline surveys do not include all hedgerows. This includes those under the proposed route of the conveyor within PoTLL's land. The Commitment needs to make clear how the Applicant will account for hedgerows not included within the baseline that will nevertheless be lost.</i>		
TB002	<i>Temporary fencing would be used to demarcate important and protected habitats, preventing construction access to protect them from accidental damage. Important and protected habitats include ecological translocation sites and retained woodland, trees and hedges shown on the Environmental Masterplan (Figure 2.4, Application Document 6.2), except where the SoS has agreed to vary the demarcation of such retained woodland, trees and</i>	<i>It is not clear if 'important habitats' includes open mosaic habitat, and if so, how these will be defined.</i>		

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response		
			<p><i>hedges having consideration for REAC commitment TB003. Fencing would be installed under the supervision of the Environmental Clerk of Works and in accordance with good practice guidance. It shall include tree protection measures specified in the Arboricultural Method Statement.</i></p>	
		<p><i>TB004</i></p>	<p><i>Disturbance, and incidental mortality, of breeding birds would be avoided by timing vegetation clearance and structure removal outside of the bird nesting season (March to August inclusive) wherever possible. Where this is not possible, appropriate measures would be taken to avoid harming birds or their nests (such as temporary fencing around nesting sites where they are immediately adjacent to construction works), under supervision by a suitably experienced Environmental Clerk of Works.</i></p>	<p><i>It is not clear how the Applicant will prevent disturbance to ground-nesting birds, such as skylark which is present within PoTLL's land.</i></p>
		<p><i>TB005</i></p>	<p><i>Invasive species would be identified prior to construction and would be removed or treated to prevent their spread, following the Construction Industry Research and Information Association's guidance in Wade et al. (Invasive Species Management for Infrastructure Managers and the Construction Industry, 2008).</i></p>	<p><i>Additional clarity is required as to whether this commitment includes as an invasive species Russian olive <i>Elaeagnus angustifolia</i>. This is present within PoTLL's land and has invasive tendencies when growing in PFA substrate. Other species with invasive tendencies (e.g. goat's rue <i>Galega officinalis</i>) may also merit attention.</i></p>
		<p><i>TB006</i></p>	<p><i>Employment of suitably qualified and experienced Environmental Clerk of Works throughout the construction phase of the</i></p>	<p><i>The complexity of the ecological constraints involved in the Scheme and the ecological sensitivity require</i></p>



ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response		
			<i>Project to supervise implementation of environmental mitigation and protection commitments.</i>	<i>specialist oversight. The role of an Environmental Clerk of Works is too broad to give confidence that the works will be managed in a sufficiently sensitive manner.</i>
		TB012	<i>Bird nest boxes would be provided within areas of retained woodland, trees and hedges shown on the Environmental Masterplan (Figure 2.4, Application Document 6.2) to supplement the habitat creation by offsetting the loss of nesting opportunities whilst newly created habitats establish. A ratio of 10 assorted small nest boxes and one medium open fronted nest box per hectare of lost woodland/scrub would be adopted in accordance with BTO Field Guide No. 23, where it is reasonably practicable to erect this number of nest boxes. For hedgerows, a ratio of 10 assorted small nest boxes per kilometre of hedgerow would be adopted, where it is reasonably practicable to erect these numbers within retained vegetation. The measures would be implemented under the supervision of the Environmental Clerk of Works.</i>	<i>As with REAC ref no. TB004, it is not clear how ground-nesting birds are to be managed and impacts to these birds mitigated.</i>
		TB013	<i>Where habitats are known or assumed to support protected or notable species, as identified on ES Figure 8.1 to 8.31 (Application Document 6.2) or referred to in the wider landscape. These measures would be implemented under the supervision of the Environmental Clerk of</i>	<i>Protected species must not be directed into PoTLL's land as these areas are either currently operational, form future development land, or are likely to be subject to future protected species</i>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response	
			<p><i>Works. ES Appendices 8.1 to 8.14 (Application Document 6.3), clearance would take place in a phased, directional manner towards areas of contiguous retained habitat. This would encourage mobile species to actively move from the construction site into the wider landscape. These measures would be implemented under the supervision of the Environmental Clerk of Works</i></p> <p><i>displacement activities related to development of the Freeport.</i></p>
		TB015	<p><i>Monitoring of protected species during and post-construction would be in line with the requirements of the protected species mitigation licence.</i></p> <p><i>PoTLL has been unable to find an explanation for how protected reptile species will be monitored. Please also refer to PoTLL's response to ExQ2 Q11.1.2.</i></p>
		TB017	<p><i>Where protected species licences are not required, the approach to habitat clearance and the potential need to trap and translocate non-licensable species (reptiles and/or native amphibians species excluding GCN) to established receptor sites with sufficient carrying capacity would be determined and undertaken by the Environmental Clerk of Works. Where translocation occurs, species will be only be translocated to receptor sites with established habitat.</i></p> <p><i>Please refer to PoTLL's response to ExA Q11.1.2.</i></p>
		TB023	<p><i>The footings of the Tilbury2 aggregates conveyor will be carefully sited during installation to avoid existing wetland habitat within this area. Footings will be a minimum of 5m from bank tops. Any temporary crossings of ditches required during the</i></p> <p><i>The area where the conveyor is proposed is very constrained, with closely-spaced ditches less than 10 metres apart. PoTLL also has an access track in this area that must be retained. As currently drafted,</i></p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response	
			<p><i>conveyor's installation and decommissioning will be managed using a Bailey bridge (or similar), which will be removed from site once installation is complete. The exact location of the footings and the bridge will be agreed with the Environmental Clerk of Works prior to installation.</i></p> <p><i>this REAC commitment makes it impossible to construct the conveyor. Noise disturbance and vibration from a conveyor could also give rise to disturbance of water voles in their places of shelter, potentially consistent with a legal offence under the Wildlife &amp; Countryside Act 1981 (as amended). PoTLL would welcome a replacement commitment to enable the conveyor to be brought forward without negatively affecting the water vole mitigation and whilst retaining the access track in this area.</i></p>
		<p><b>Applicant's response:</b></p> <p>The Applicant's responses to PoTLL's comments against the REAC commitments <a href="#">[REP6-038]</a> listed above is provided below:</p> <ul style="list-style-type: none"> <li>• <b>TB001</b> No amendment proposed. The generality of the REAC commitment is to create new hedgerow as shown on the Environmental Masterplan. TB001 is specifically about timing.</li> <li>• <b>TB002</b> No amendment proposed. The generality of the REAC commitment is to protect habitat marked as retained on the Environmental Masterplan <a href="#">[REP4-124, REP3-098, REP2-018, APP-162, REP4-127, REP4-129, REP2-024, REP2-026, REP2-028 and REP2-031]</a>. TB002 is specifically about protective fencing.</li> <li>• <b>TB004</b> No amendment proposed. The REAC commitment addresses nesting birds regardless of nest site.</li> <li>• <b>TB005</b> No amendment proposed. The Applicant's approach to identifying invasive non-native species is in line with existing government guidance contained within Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of the Invasive Alien Species (Enforcement and Permitting) Order 2019.</li> </ul>	

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<ul style="list-style-type: none"> <li>• <b>TB006</b> No amendment proposed. As explained in the CoCP <a href="#">[REP6-038]</a> Table 4.1, other ecology specialists will be employed during the Project's construction phase.</li> <li>• <b>TB012</b> No amendment proposed. The Applicant confirms that ES Chapter 8: Terrestrial Biodiversity <a href="#">[APP-146]</a>, Section 8.6.115 - 8.6.120 and 8.6.344 - 8.6.349 provides the details of the impacts to ground nesting birds, and how these will be mitigated. The Applicant will mitigate these impacts by managing retained habitats for the benefit of species (see TB007 of the CoCP <a href="#">[REP6-038]</a>), and the creation of new suitable semi-natural habitats within the Project's Order Limits.</li> <li>• <b>TB013</b> No response required.</li> <li>• <b>TB015</b> No amendment proposed. This is addressed in the Applicant's response to PoTLL comments on ExA Q11.1.2.</li> <li>• <b>TB017</b> No amendment proposed. This is addressed in the Applicant's response to PoTLL comments on ExA Q11.1.2.</li> <li>• <b>TB023</b> No amendment proposed. Natural England licensing team have confirmed they are content with the Project's proposed approach to water vole mitigation in this area through the issue of a Letter of No Impediment (LoNI) in relation to the draft protected species licence.</li> </ul>
ExQ2_Q16.1.4	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-167]</a></p> <p><i>'AQ001: whilst Thurrock welcome the amendment of AQ001 in response to previous comments, the Council consider that it requires further updates to reflect LTC 'pathfinder' status for the use of hydrogen as an alternative to diesel in June 2023 (Lower Thames Crossing - Latest news - Lower Thames Crossing to use hydrogen powered construction machinery - National Highways) to ensure these commitments will be secured through the DCO. In particular AQ001 Section 4 (Use low emission vehicles and plant fitted with catalysts, diesel particulate filters or similar devices where reasonably practicable.) has clearly been superseded by this commitment. The Council would again highlight that AQ001 Section 5 (Use ultra-low sulphur fuels in plant and vehicles where reasonably practicable) is a legal requirement and the Council is not aware of any situation where plant could use any other fuel.'</i></p> <p><b>Applicant's response:</b> To reflect the Project as a 'pathfinder' for low carbon construction, the Applicant has set out in the Carbon and Energy Management Plan <a href="#">[APP-552]</a> the mechanisms and management arrangements that the Applicant will use to deliver its carbon ambitions for the Project. The Carbon and Energy Management Plan</p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p><a href="#">[APP-552]</a> also includes commitment CBN09 which requires Contractors to use zero tailpipe emission vehicles, and CBN10 which requires Contractors to promote the use of active transport for personnel to and from the compounds. Paragraph 6.1.7 of Environmental Statement Appendix 2.2: Code of Construction Practice (CoCP) <a href="#">[REP6-038]</a> also states '<i>Contractors will be encouraged to optimise the use of autonomous plant and equipment the use of hydrogen fuel, fuel cells, electric and hybrid plant and hydrotreated vegetable oil and a modernised fleet</i>'. The Applicant therefore does not intend to re-word the fourth bullet of AQ001 as the hydrogen commitments are covered in other DCO documents.</p> <p>However, the fifth bullet of AQ001 has been amended for Deadline 7 to '<i>Use ultra-low sulphur fuels in plant and vehicles <del>where reasonably practicable</del></i>', as use of ultra-low sulphur diesel is a legal requirement, as the Council have highlighted in their Deadline 6 response.</p> <p><i>'AQ007: as per the SoCG, the Council understand that the applicant has agreed to the commitments for a minimum of 6-months baseline monitoring and the EMP and REAC will be updated accordingly.'</i></p> <p><b>Applicant's response:</b> Following Thurrock Council's request, REAC AQ007 was updated at Deadline 6 and included in the CoCP <a href="#">[REP6-038]</a>.</p> <p><i>'AQ008: the Council consider that the 'site action level' should be set in accordance with IAQM guidance (unless more appropriate data becomes available), which is understood to be applied to HS2 and a majority of other construction projects across the UK.'</i></p> <p><b>Applicant's response:</b> The Applicant does not intend to re-word AQ008. The Contractor shall determine the site action level for approval by the Secretary of State in consultation with the relevant local authorities. This will be part of the air quality monitoring programme that will be set out in the dust/air quality management plan as part of EMP2 and as general best practice, would consider IAQM guidance.</p> <p><i>'AQ008: the Council remain concerned that there is no specific commitment to take the necessary actions to resolve the cause of any exceedance of the air quality action level, only that they will be investigated, recorded and parties informed. As currently worded AQ008 does not preclude the continuation of activities that are causing excessive levels of dust. Therefore, there needs to be a clear commitment to implement the necessary measures at the earliest opportunity to mitigate the impacts, whether this relates to enforcement of the dust control measures in AQ003 – 005, or additional measures including the suspension of the specific</i></p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<p><i>activity until appropriate mitigation can be applied and to ensure these are applied for the remainder of the activity.'</i></p> <p><b>Applicant's response:</b> The Applicant does not intend to re-word AQ008; this matter was responded to under ExQ1_Q5.1.10 within Responses to the Examining Authority's ExQ1 Appendix C: 5. Air Quality <a href="#">[REP4-190]</a>.</p>
ExQ2_Q16.1.4	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-167]</a></p> <p><b>Thurrock's comment regarding Cultural Heritage (pg 46 of 48):</b> <i>'CH004: this REAC should include a commitment to secure the Level 3 Building Recording of the settings of Baker Street Windmill (LB57) and Whitecrofts Farmhouse (LB37). Both are Grade II listed buildings, which will experience a high degree of change within their settings resulting in less than substantial harm. The recording of Baker Street Windmill is noted in table 9.3 of the Archaeological Mitigation Strategy [APP-367], but reference is not made to Whitecrofts or the specific need to record their settings rather than the buildings themselves.'</i></p> <p><b>Applicant's response:</b> Commitments CH003 and CH004 in the Register of Environmental Actions and Commitments (REAC) <a href="#">[REP6-038]</a> relate to instances where a designated (or equivalent) heritage asset is predicted to experience substantial harm and outlines the proposed mitigation. The Applicant does not intend to include designated (or equivalent) heritage assets which are predicted to experience less than substantial harm within the scope of these REAC commitments.</p> <p>The Applicant agrees, however, that Whitecroft's Farm (LB37), like Baker Street Windmill (LB57) will experience a moderate adverse effect, that is less than substantial harm and significant (paragraphs 6.6.157 and 6.6.342 of Environmental Statement (ES) Chapter 6: Cultural Heritage <a href="#">[REP4-116]</a>). As these are the only two listed buildings in Thurrock predicted to experience a permanent moderate adverse effect, the Applicant agrees that the setting of Whitecroft's Farm (LB37) should be recorded, and the draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation has been updated accordingly <b>[Document Reference 6.3 ES Appendix 6.9 (4)]</b>.</p>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		Mitigation Type 2.3 Historic Buildings Recording has been updated to include instances where a building is not lost, but the setting is altered. The recording will extend to the setting of the building and will record their relationship and the extent of the existing setting [ <b>Document Reference 6.3 ES Appendix 6.9 (4)</b> ].
ExQ2_Q16.1.4	Thurrock Council	<p><b>ExQ2 response by stakeholder:</b> <a href="#">[REP6-167]</a></p> <p><b>Applicant's response:</b> In response to Geology and Soils section of Section 16 (page 45 of 48) regarding the request for a commitment in the Code of Construction Practice (CoCP) <a href="#">[REP6-038]</a> for specific surveys at the river frontage:</p> <ul style="list-style-type: none"> <li>• The erosional face of the River Thames to the existing landfill at Goshems Farm is recognised as a pre-existing condition which is not considered to be adversely impacted by the Project, including the construction of the proposed Tilbury Fields. No works are proposed along the East Tilbury landfill river frontage and the river frontage would not be subject to compulsory acquisition as highlighted by Plot 16-40, 16-41, 16.44 and 16-60, Land Plans, Sheet 16 <a href="#">[REP5-006]</a>.</li> <li>• Notwithstanding this, the Contractor would still have to manage risks associated with the construction works in accordance with commitment GS003 for geotechnical risks, in the Register of Environmental Actions and Commitments (REAC) <a href="#">[REP6-038]</a>. REAC GS003 includes a requirement for the Contractor 'to <i>proactively manage potential impacts from geohazards</i>', with specific mention of land instability and includes the commitment to establish a programme of instrumentation and monitoring. This is secured through Requirement 4 of the draft Development Consent Order <a href="#">[REP6-010]</a>. This would cover the design and construction of Tilbury Fields. This is standard design development practice.</li> <li>• The Applicant anticipates that an Environmental Permit (EP) will be required for the waste recovery operation required to create Tilbury Fields which will need approval by the Environment Agency.</li> <li>• Through the EP application any waste recovery assessment will have to provide details on the engineering properties of the material and demonstrate that the waste is '<i>suitable for its intended purpose</i>' and provide site-specific risk assessments to satisfy the Environment Agency that the operation will not cause pollution.</li> <li>• The EP application will also require evidence to demonstrate that it is designed and constructed to industry standards, is fit for purpose and will not cause soil erosion or increase risks of flooding and will also require a period of aftercare monitoring to ensure the material is physically and chemically stable.</li> </ul>

ID	External stakeholder	ExQ2 response by stakeholder / Applicant's response
		<ul style="list-style-type: none"> <li>Therefore, any engineered structures, such as the earthworks for the proposed development at Tilbury Fields would require appropriate geotechnical and environmental assessments and will be designed by a suitably qualified person as evidence to support the application.</li> </ul> <p>On the basis of the construction commitments secured via REAC GS003 and expected through the EP application, the Applicant does not consider there is a need for a specific commitment as proposed by Thurrock Council.</p>



## Glossary

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

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

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

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