

# Lower Thames Crossing

## 9.176 Applicant's comments on Interested Parties' submissions at Deadline 6

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#### List of contents

	Page number
<b>1 Introduction .....</b>	<b>1</b>
1.1 Introduction .....	1
1.2 Signposting to other responses to Deadline 6 submissions.....	1
<b>2 Gravesham Borough Council.....</b>	<b>2</b>
<b>3 Kent Downs AONB Unit .....</b>	<b>13</b>
<b>4 Medebridge Solar Limited .....</b>	<b>16</b>
<b>5 Natural England.....</b>	<b>17</b>
<b>6 Thames Crossing Action Group .....</b>	<b>25</b>
<b>7 Thurrock Council.....</b>	<b>26</b>
<b>Glossary .....</b>	<b>62</b>
<b>Appendices .....</b>	<b>65</b>
<b>Appendix A Receptors and Model Verification Zones.....</b>	<b>66</b>

## Table of figures

Figure 1 TomTom March 2019 vs TomTom March 2023, All Day Passenger Traffic, Southbound .....	28
Figure 2 TomTom March 2019 Vs TomTom March 2023, All Day Passenger Traffic, Northbound (both tunnels) .....	29
Figure 3 TRIS count locations.....	30
Figure 4 Dartford Crossing northbound, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023) .....	31
Figure 5 M25 clockwise between junction 29 and junction 30, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023).....	32
Figure 6 M25 anticlockwise between junction 30 and junction 29, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023).....	33
Figure 7 M25 clockwise between junction 2 and junction 3, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023).....	34
Figure 8 M25 anticlockwise between junction 3 and junction 2, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023).....	35
Figure 9 A2 eastbound between the M25 and Bean, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023).....	36
Figure 10 A2 westbound between Bean and the M25, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023).....	37
Figure 11 M20 eastbound between junction 2 and the M26, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023).....	39
Figure 12 M20 westbound between the M26 and junction 2, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023).....	40
Figure 13 A13 westbound within A1012 junction, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023) .....	42

# 1 Introduction

## 1.1 Introduction

- 1.1.1 The Applicant has reviewed the submissions made by Interested Parties at Deadline 6, which are not regarding the Examining Authority's Further Written Questions (ExQ2) or post-hearing submissions (from the October hearings).
- 1.1.2 The Applicant has provided responses to part of the following submissions with the aim of assisting the Examining Authority and the Examination process:
- a. Gravesham Borough Council [[REP6-131](#), [REP6-132](#), [REP6-135](#), and [REP6-136](#)] (Section 2 of this document)
  - b. Kent Downs AONB Unit [[REP6-141](#)] (Section 3 of this document)
  - c. Medebridge Solar Limited [[REP6-192](#)] (Section 4 of this document)
  - d. Natural England [[REP6-152](#)] (Section 5 of this document)
  - e. Thames Crossing Action Group [[REP6-204](#)] (Section 6 of this document)
  - f. Thurrock Council [[REP6-164](#) and [REP6-168](#)] (Section 7 of this document)
- 1.1.2 The Applicant has not sought to provide a summary of the Interested Parties' (IPs') submissions, to avoid misrepresenting statements made by others. Instead, the Applicant has provided links to source documents for each response below. Where helpful to provide context for the Applicant's response extracts of direct quotes are provided within the body of the response.
- 1.1.3 The Applicant has no comments to make on the other Deadline 6 submissions made by Interested Parties.

## 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 the ExQ2. For information on this, refer to the Applicant's Comments on IPs' Responses to ExQ2 at Deadline 6 [**Document Reference 9.175**].
  - b. 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**].
  - 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 Gravesham Borough Council

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
General comments and observation	Gravesham Borough Council	<p><b>Link to IP's submission:</b> ExQ1 responses on page 3 of <a href="#">[REP6-125]</a></p> <p><b>Applicant's response:</b> <u>Baseline photography</u> A review of existing baseline photography was undertaken in 2021 to determine Representative Viewpoints where the visual baseline had changed since initial survey work, with additional photography undertaken in some locations, as stated in paragraph 7.3.73 of Environmental Statement (ES) Chapter 7: Landscape and Visual <a href="#">[APP-145]</a>. The additional photography was undertaken in areas where there had been the greatest potential for change in the visual baseline, such as in the Tilbury area. Generally, growth of existing vegetation was considered unlikely to result in a notable change in existing views, except in areas such as Jeskyns Community Woodland where newly establishing woodland areas had a greater chance of affecting the character of existing views. The Applicant accepts that growth of existing vegetation would have occurred between 2019 and 2022 at all Representative Viewpoints. However, this is not considered to affect the visual impact assessment at Representative Viewpoint S-03 for the following reasons:</p> <ul style="list-style-type: none"> <li>• Baseline 2023 winter: Buildings at Harlex Haulage would still be visible in winter, as the planting belt along the boundary of Harlex Haulage would not be dense enough to screen views. A2 and HS1 infrastructure would also still be visible.</li> <li>• Baseline 2023 summer: Buildings at Harlex Haulage and A2 and HS1 infrastructure would still be visible in the summer view, so any screening provided by proposed planting would result in a beneficial change.</li> </ul> <p><u>Year 15 photomontage views</u> The summer year 15 photomontages at Representative Viewpoint S-03 submitted in ES Figure 7.19 <a href="#">[REP6-036]</a> illustrate the screening of buildings at Harlex Haulage and A2 and HS1 infrastructure provided by proposed planting. In addition, Sheet 4 illustrates a limited change in visual enclosure at year 15, with mid-range views remaining towards a group of existing veteran trees and long-range views remaining towards the Darnley Mausoleum within the Kent Downs Area of Outstanding Natural Beauty south of the</p>

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		<p>A2 corridor. It is therefore not considered that long-range views from Representative Viewpoint S-03 would be as affected as stated by Gravesham Borough Council in their Deadline 6 submission [<a href="#">REP6-125</a>]. A minor (beneficial) magnitude of effect at design year (summer) is still considered to be appropriate, as presented in ES Appendix 7.10: Schedule of Visual Effects [<a href="#">APP-385</a>].</p> <p><u>Number of photomontage sheets</u></p> <p>The photomontages have been prepared in accordance with the methodology described in ES Appendix 7.8: Technical Methodologies [<a href="#">AS-054</a>], which explains in paragraph 3.1.4 and Section 3.4 the presentational requirements of photomontages on drawing sheets, in accordance with Visual Representation of Development Proposals TGN 06/19<sup>1</sup>. As stated in paragraph 3.1.4 of ES Appendix 7.8, 'Where the horizontal field of view required to illustrate the Project exceeds 56°, photomontages have been presented on continuation sheets.' This methodology therefore follows industry standard and accepted best practice guidance to give a representative view.</p>
Appendix 4 ExQ2: Questions from Examining Authority	Gravesham Borough Council	<p><b>Link to IP's submission:</b> <a href="#">[REP6-131]</a></p> <p><b>Applicant's response:</b></p> <p>The table at pages 17 – 20 of Gravesham's document lists some suggested Register of Environmental Actions and Commitments (REAC) amendments that are explained in their Issue Specific Hearing 7 (ISH7) post hearing written representations [<a href="#">REP4-302</a>]. These have already been acted on by means of REAC amendments being submitted at Deadline 7 in Environmental Statement Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan [<b>Document Reference 6.3 ES Appendix 2.2 (7)</b>]. These are covered by amendments to REAC commitments LV008, LV010 and new REAC commitments LV035 and LV035.</p> <p>Gravesham Borough Council (GBC) has suggested that the existing REAC commitments MW009 and MW017 [<a href="#">REP6-038</a>] are addressed by additional DCO requirements rather than REAC commitments. The Council has also suggested some amendments to the REAC commitments on a without prejudice basis. The Applicant does not consider these measures need to be secured via fresh Requirements as they are already secured via Requirement 4(2).</p>

<sup>1</sup> Landscape Institute (2019). Visual Representation of Development Proposals Technical Guidance Note 06/19. Accessed November 2023.  
[https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/09/LI\\_TGN-06-19\\_Visual\\_Representation.pdf](https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/09/LI_TGN-06-19_Visual_Representation.pdf).

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		<p>In relation to MW009, the Applicant does not consider an amendment necessary because it seeks to introduce a requirement in relation to worksites which is already addressed via MW0017. In addition, it seeks to regulate other excavated material, but it is not clear that this is relevant or what material is being referred to. The primary difference is that GBC's drafting includes <i>"All other tunnel spoil will be transferred through the tunnel to the North Portal for placement"</i> but this is already secured because MW009 explicitly states that <i>"Material excavated by the tunnel boring machinery will be generated as a slurry and this will be transferred by pipeline through the tunnel to the North Portal for placement"</i>.</p> <p>In relation to MW0017, the Council requests a wider commitment which is ambiguous in relation to storage. The Applicant has made clear there are construction compounds south of the river, and the broad commitment could apply to activities which are not related to tunnel machinery, which the Applicant understands is the Council's primary concern. The Applicant considers that there is sufficient safeguard and security provided by the commitment that <i>"There will be no storage of concrete tunnel segments on the ground surface at the southern tunnel entrance compound"</i>.</p> <p>There are some other suggested amendments that the Applicant has not seen before relating to REAC commitment NV018 and a proposed new item on Landscaping planting: comprehensive assessment.</p> <p>The Applicant does not intend to amend NV018 to as suggested by GBC. NV018 already requires that the assessment be compliant with the Noise Insulation Regulations 1975 and no further elaboration is considered necessary.</p> <p>The Applicant does not intend to adopt the suggest REAC item on Landscaping planting: comprehensive assessment as these matters are already addressed in the outline Landscape and Ecology Management Plan [<a href="#">REP4-140</a>].</p>
<p>Appendix 5 Comments on National Highways Deadline 5 Documents relating to the DCO including Annex 1 "Proposed new</p>	<p>Gravesham Borough Council</p>	<p><b>Link to IP's submission:</b> Response to proposed new requirement on worker accommodation (Annex 1) [<a href="#">REP6-132</a>]</p> <p><b>Applicant's response:</b> The Applicant recognises that Gravesham Borough Council (GBC) has provided a suggested additional Requirement to the Examination, related to the use of accommodation in Gravesham by the non-local construction workforce.</p> <p>In summary, GBC suggests the following measures to be secured as a Requirement of the Development Consent Order (DCO):</p> <ol style="list-style-type: none"> <li>1) A Gravesham Accommodation Resilience Scheme to be approved by the Secretary of State</li> </ol>

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Requirement relating to Housing and Worker Accommodation in Gravesham"		<p>2) A Gravesham Accommodation Working Group</p> <p>3) A Private Housing Supply Plan to include measures that would be designed by GBC but funded by the Undertaker related to increasing private market stock and supporting rent and deposit guarantees</p> <p>4) Housing and Homelessness Services Resilience Measures including providing emergency and temporary accommodation and resources for the council's statutory housing service</p> <p>The proposed Requirement is based very closely on Schedule 3 of the Deed of Obligation agreed between EDF Energy and East Suffolk Council in respect of the Sizewell C Development Consent Order. In short, the Applicant does not consider this Requirement to be necessary in light of the highly precautionary assessment and sensitivity analysis which shows no significant effect on accommodation in the Workers Accommodation Report (WAR) [<a href="#">APP-551</a>].</p> <p>As has been set out previously by the Applicant in response to GBC's Local Impact Report (Comments on LIRs Appendix D: Gravesham Borough Council [<a href="#">REP2-058</a>]) and in response to ExQ1_Q13.1.17 [<a href="#">REP4-201</a>], comparisons on the impacts between the Lower Thames Crossing to Hinkley Point C or Sizewell C are disproportionate given the scale of workforce demand and the overall level of existing supply.</p> <p>For example, Sizewell C is anticipated to result in a peak non-home-based workforce (in rented or visitor accommodation) of 1,200 people largely within rural East Suffolk, particularly in Leiston and Saxmundham which are much smaller settlements than Gravesend. By comparison, the Lower Thames Crossing's anticipated peak non-home-based workforce (rented accommodation) in Gravesham is anticipated to be just 6% of the scale of Sizewell C's, at around 76 workers in a market of over 17,000 private rented bedspaces, resulting in a negligible effect.</p> <p>As such, the approach to monitoring and management of the construction workforce for the Lower Thames Crossing has been designed to reflect the likely scale of effects assessed within the WAR [<a href="#">APP-551</a>], which is cognisant of the demand profile, and the substantial supply of both resident construction workforce and accommodation.</p> <p>While considering that the Project is not assessed to result in a substantial or significant effect, the Applicant has recognised that there is uncertainty and is sympathetic to the council's position regarding pre-existing pressures on housing services which are largely as a result of structural public funding issues and the wider economic environment.</p> <p>As such, the Applicant has suggested a number of measures within the Framework Construction Travel Plan (FCTP) [<a href="#">REP5-054</a>] (which is secured by the draft Development Consent Order (dCO) [<a href="#">REP6-010</a>])</p>

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		<p>that already provide commitments to best-practice monitoring, forward-look assessments, collaboration and intervention.</p> <p>The WAR <a href="#">[APP-551]</a> and the FCTP <a href="#">[REP5-054]</a> summarise how monitoring, governance and interventions will be developed and implemented collaboratively to avoid adverse effects. The proposals create an agile framework to cater for the uncertainty and to work closely with local authorities to respond quickly if issues arise (and, in fact, look ahead to potential issues and avoid them before they manifest). The approach aims to address impacts should they arise based on evidence provided by the Project's monitoring (and look-ahead information) and local authority data. This enables solutions to be fit for purpose based on the specific issues that could occur.</p> <p>In summary, the key features of the Applicant's approach (secured by the FCTP <a href="#">[REP5-054]</a>) are as follows:</p> <ul style="list-style-type: none"> <li>a. <b>Accommodation Helpdesk</b> – <i>this would be operated by National Highways and would be a tool to assist workers with finding suitable and available accommodation near the Project. The Helpdesk would support prospective providers of accommodation in understanding the Project and its workforce and managing tenancies safely and legally. Workers would not be mandated to use accommodation registered on the Accommodation Helpdesk. The Helpdesk would also oversee collation of monthly data from the contractors and produce accommodation monitoring reports which would in turn inform where workers could be directed/recommended via the Helpdesk.</i></li> <li>b. <b>Accommodation database</b> – <i>the Contractors would be required to create and maintain a live database that monitors the number of workers who are 'non-local' (i.e. workers moving their permanent accommodation or taking temporary accommodation as a result of gaining employment on the Project, rather than remaining in their pre-existing residence and commuting) and the accommodation being used by the non-local workforce in terms of the type of accommodation (on-site project accommodation, private rented, spare rooms/latent, owner-occupied or tourist/visitor) and the location of this accommodation (via a postcode). The Contractors would mandate that its workforce, and those of its suppliers, regularly update their information related to the database for every worker. This database would be reported on a monthly basis to members of the Workforce Accommodation Working Group (WAWG).</i></li> <li>c. <b>Workforce Accommodation Working Group</b> – <i>this would include representatives from National Highways, its Contractors, and local authorities. The WAWG would receive monthly workforce accommodation monitoring reports from the Helpdesk, and regular updates and information from the</i></li> </ul>

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		<p><i>Project including 'look-ahead' for potential workforce implications over a 12-month period led by National Highways and Contractors. The findings of the workforce accommodation monitoring report would be considered alongside other information, such as other monitoring secured by the Project (e.g., via the FCTP and Skills, Education and Employment (SEE) Strategy (Appended to s106 Agreement, Application Document 7.3)) and information provided by authorities on market conditions and other developments in the local area. The Terms of Reference for the WAWG can be found in Appendix D.</i></p> <p><i>d. <b>Visitor accommodation utilisation</b> – the WAWG must be provided with details of the reasonable endeavours which the Contractors have used to ensure the use by non-local workers of visitor accommodation with the aim of reducing conflict with visitor accommodation used by Local Authorities as temporary accommodation.</i></p> <p><i>e. <b>Collaboration opportunities</b> - the Contractors must provide the WAWG with the details of the reasonable endeavours undertaken to coordinate, and jointly manage, construction workforce impacts with the developers of a nationally significant infrastructure project which overlaps with the Order Limits, or of a project identified in the Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes [<a href="#">APP-550</a>]</i></p> <p><i>Contractors would also be required to propose further reasonably practicable measures which encourage a higher proportion of locally employed workers (thereby reducing demand for accommodation) and incentivise workers to live in areas which have higher capacity or less sensitivity. Areas may be more sensitive to change if they are determined by a local authority to have more potential to provide accommodation sought after by households in housing need or have a greater supply of accessible, affordable rented accommodation. The measures would also include reviewing the outcomes of the monitoring provided to the WAWG, and feedback from Local Authorities who are members of the WAWG, to encourage workers to live in areas where sustainable transport (either existing or provided by the Contractor) is available and which have higher levels of accommodation available, or are less sensitive. Measures would be presented to the WAWG, and National Highways would have due regard to comments raised at that group on the measures to be undertaken.'</i></p> <p>The Applicant believes that the proactive monitoring of worker accommodation need, including a 12-month look ahead that has been proposed, will allow the Applicant to anticipate and manage impacts within the context of the housing market at that time. The Applicant's precautionary measures outlined above and, in particular, the Workforce Accommodation Working Group (WAWG) provide a route for key parties to work</p>



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		<p>together on reviewing the evidence and identifying appropriate action, which would in most cases be actioned by the Contractors in their management of the workforce rather than the need to 'back-fill' for adverse effects experienced by the council.</p> <p>It should be noted that the Applicant has already committed to a WAWG, as described at paragraph 5.4.13(c) and Appendix D of the FCTP [REP5-054], which would largely deliver the functions identified by GBC in its proposed Requirement.</p> <p>The Applicant does not consider it proportionate to require the Secretary of State to sign off implementation plans, which would be developed collaboratively and quickly through the proposed conditions of the FCTP [REP5-054] referenced above and the plans which would be approved by the Secretary of State under Requirement 11 – these would enable the Project, Contractors and local authorities to implement, monitor and adapt measures in a more responsive and flexible manner (meetings and reviews would occur monthly).</p> <p>In terms of the approach to monitoring of housing market stress, the Applicant notes that the terms of reference for the WAWG include the following provision, which recognises the importance of local authority monitoring but reflects that there are many variables that may contribute to local housing market stress that may not be linked to the Project:</p> <p><i>'Formal monitoring secured in the FCTP would be reported monthly and provided in a suitable format for review two weeks prior to each WAWG meeting. This monitoring would enable pro-active management of interventions. The WAWG would review the Project's non-local workforce in the Private Rented Sector (PRS) and visitor accommodation at a local authority scale alongside 12-month forward look information and, if anticipated to exceed estimates set out in the Workers Accommodation Report (WAR) [APP-551], the Contractor must implement further interventions.</i></p> <p><i>These 'triggers' are to be ratified at the inaugural WAWG but would be based on:</i></p> <ol style="list-style-type: none"> <li><i>a. The number of workers by accommodation type and local authority set against the estimates provided in the WAR</i></li> <li><i>b. Any appropriate sub-local-authority level threshold where there are areas of particular sensitivity identified by the local authorities and agreed by the WAWG.</i></li> </ol> <p><i>Measures would be presented to the WAWG and National Highways would have due regard to comments raised at that group on the measures to be undertaken (see paragraph 5.4.14 of the FCTP). Final recommendations would be circulated to the WAWG.'</i></p>

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Appendix 7b Amendments to REAC & Design Principles	Gravesham Borough Council	<p><b>Link to IP's submission:</b> <a href="#">[REP6-135]</a></p> <p><b>Applicant's response:</b> Gravesham Borough Council has proposed amendments to four commitments in the Register of Environmental Actions and Commitments (REAC) <a href="#">[REP5-048]</a> as set out below, with the Applicant's responses.</p> <p><u>Commitment AQ006</u></p> <p><b>Proposed amendment:</b> The Contractors <b>in consultation with the local planning authority</b> shall <b>determine agree</b> the level of any dust and particulate monitoring carried out on Project construction sites by means of a risk-based approach. This will identify the type of monitoring that is required on each worksite by looking at the details of the specific packages of work within the site boundaries and the location of receptors around the site. <del>Should monitoring be required, the monitoring locations will be approved by the Secretary of State (SoS) in consultation with the relevant local authorities.</del></p> <p><b>Gravesham Borough Council's reasoning:</b> <i>'Not acceptable as it gives the Contractor total control and only gives the LA [local authority] a chance to comment on proposals made – not those not made. The applicant has to consider that they need to show local residents that there is no issue even if they think there is not.'</i></p> <p><b>Applicant's response:</b> This change is not needed. The achievement criteria for this commitment stated in the REAC is 'Approval of air quality monitoring programme by the SoS in consultation with relevant local authorities', so this consultation is already provided for. It is not necessary or proportionate to undertake monitoring on all construction sites at all times. The Contractor will undertake monitoring where the risks involved merit it, but not otherwise. The Contractor will propose a bespoke approach for each site for approval depending on the nature of operations and proximity and vulnerability of sensitive receptors.</p>



Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p><u>Commitment GS029</u></p> <p><b>Proposed amendment:</b> Surplus clean chalk soils generated from construction works south of the River Thames may be stockpiled to facilitate control of offsite Heavy Goods Vehicle traffic. Stockpiles of surplus clean chalk would be designed to safeguard the underlying soils and groundwater and the design would be agreed by the SoS in consultation with the Environment Agency <b>and the local planning authority</b> prior to stockpiling commencing.</p> <p><b>Gravesham Borough Council's reasoning:</b> <i>'Physical location and height should be agreed with LPA [local planning authority]'</i></p> <p><b>Applicant's response:</b> This commitment arises from the need to protect soils and groundwater which are matters under the remit of the Environment Agency who will therefore be consulted rather than the local authority.</p> <p><u>Commitment NV005</u></p> <p><b>Proposed amendment:</b> Pre-construction baseline noise levels would be submitted <b>and agreed with</b> <del>to</del> the relevant planning authorities to establish a pre-construction baseline for monitoring compliance with construction noise limits.</p> <p><b>Gravesham Borough Council's reasoning:</b> <i>'Need to be agreed with PA's [planning authorities]'</i></p> <p><b>Applicant's response:</b> This change is not needed. Control by relevant planning authorities is already provided for under Control of Pollution Act 1974, Section 61 consents as set out in NV004 [<a href="#">REP6-038</a>].</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p><u>Commitment NV009</u></p> <p><b>Proposed amendment:</b> During the construction phase, day and night-time noise and vibration monitoring would be undertaken at locations identified <b>and agreed</b> in consultation with the relevant local planning authorities to ensure that the mitigation measures suggested are working effectively.</p> <p><b>Gravesham Borough Council's reasoning:</b> 'Same point [as for NV005]'</p> <p><b>Applicant's response:</b> Similar to the proposed amendment by Gravesham Borough Council for commitment NV005, this change is not needed. The achievement criteria for this commitment stated in the REAC is '<i>Compliance with the terms of Section 61 consents</i>', so control by relevant planning authorities is already provided for.</p>
Appendix 8 Additional comments on Heritage Matters	Gravesham Borough Council	<p><b>Link to IP's submission:</b> In response to comments at ExQ1_Q12.1.11 and ExQ1_Q12.1.12 on archaeological assessment, <a href="#">[REP6-136]</a></p> <p><b>Applicant's response:</b> In response to Gravesham Borough Council's comments at ExQ1_Q12.1.11 and ExQ1_Q12.1.12 on archaeological assessment, the planning and programming of archaeological fieldwork, archaeological methods and techniques, the types of proposed archaeological mitigation and general archaeological matters, the Applicant would like to point out that: Archaeological advice to Gravesham Borough Council is provided by Kent County Council (KCC). KCC are members of the Association of Local Government Archaeology Officers. The Applicant has engaged with the Local Authority Archaeological Advisors at KCC since February 2019 and has held regular meetings as set out in Environmental Statement (ES) Chapter 6: Cultural Heritage <a href="#">[REP4-116]</a> to discuss and agree the approaches to assessment and mitigation. The Statement of Common Ground between the Applicant and KCC <a href="#">[REP6-026]</a> includes details of the status of agreements between the Applicant and KCC.</p>

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		<p>KCC has approved the approach to archaeological assessment, including the land to the west of Thong Lane, and the fieldwalking and metal-detecting referred to was proposed by KCC. Equally, the approach to ancient woodland, where there was an initial desk-based assessment and walkover survey of all potential sites, followed by archaeological trial trenching in areas of high archaeological potential, was agreed with KCC.</p> <p>Further assessment in the form of geophysical survey is planned for the nitrogen deposition compensation sites in November 2023; KCC has agreed the Written Schemes of Investigation and will review the results. This information will inform the detailed design of the planting proposals, and future mitigation which is being developed in consultation with KCC. All areas of ancient woodland planting have been identified as mitigation sites within ES Appendix 6.9: Draft Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [<a href="#">REP6-044</a>].</p> <p>In terms of the non-designated “Homes for Heroes” referred to in ExQ1_Q12.1.17, the Applicant welcomes the detailed additional information provided by Gravesham Borough Council. It will provide useful background information for the historic building recording (mitigation type 2.3) of the setting of the “Homes for Heroes” [<a href="#">REP6-044</a>] which is intended to document the current setting of the buildings and their relationship with their surroundings.</p> <p>The Applicant believes that the value assigned to all the non-designated “Homes for Heroes”, those in Thong, the solitary pair of semi-detached “Homes for Heroes” on the Shorne Ifield Road, the group along Chalk Lane and the smaller cluster on Castle Lane is correct. They are non-designated low value heritage assets. However, the impact on each group is different and only those within Thong have a moderate impact and a slight adverse effect, so heritage mitigation is only proposed for those “Homes for Heroes” within Thong in ES Chapter 6: Cultural Heritage [<a href="#">REP4-116</a>].</p>

### 3 Kent Downs AONB Unit

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
Comments on Applicant's submissions at D5	Kent Downs AONB Unit	<p><b>Link to IP's submission:</b> Comments on 6.2 ES Fig 7.19 - Photomontages - Winter Year 1 and Summer Year 15 (1 of 4) v3.0 (photomontage at VP S-03) <a href="#">[REP6-141]</a></p> <p><b>Applicant's response:</b> <u>Baseline photography</u> A review of existing baseline photography was undertaken in 2021 to determine Representative Viewpoints where the visual baseline had changed since initial survey work, with additional photography undertaken in some locations, as stated in paragraph 7.3.73 of Environmental Statement (ES) Chapter 7: Landscape and Visual <a href="#">[APP-145]</a>. The additional photography was undertaken in areas where there had been the greatest potential for change in the visual baseline, such as in the Tilbury area. Generally, growth of existing vegetation was considered unlikely to result in a notable change in existing views, except in areas such as Jeskyns Community Woodland where newly establishing woodland areas had a greater chance of affecting the character of existing views. The Applicant accepts that growth of existing vegetation would have occurred between 2019 and 2022 at all Representative Viewpoints. However, this is not considered to affect the visual impact assessment at Representative Viewpoint S-03 for the following reasons:</p> <ul style="list-style-type: none"> <li>• Baseline 2023 winter: Buildings at Harlex Haulage would still be visible in winter, as the planting belt along the boundary of Harlex Haulage would not be dense enough to screen views. A2 and HS1 infrastructure would also still be visible.</li> <li>• Baseline 2023 summer: Buildings at Harlex Haulage and A2 and HS1 infrastructure would still be visible in the summer view, so any screening provided by proposed planting would result in a beneficial change.</li> </ul> <p><u>Year 15 photomontage views</u> The summer year 15 photomontages at Representative Viewpoint S-03 submitted in ES Figure 7.19 <a href="#">[REP6-036]</a> illustrate the screening of buildings at Harlex Haulage and A2 and HS1 infrastructure provided by proposed planting. In addition, Sheet 4 illustrates a limited change in visual enclosure at year 15, with mid-range views remaining towards a group of existing veteran trees and long-range views remaining towards the Darnley Mausoleum within the Kent Downs Area of Outstanding Natural Beauty (AONB) south of the A2</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>corridor. It is therefore not considered that views from Representative Viewpoint S-03 would be as affected as stated by the Kent Downs AONB Unit in their Deadline 6 submission [<a href="#">REP6-141</a>].</p> <p><u>Number of photomontage sheets</u></p> <p>The photomontages have been prepared in accordance with the methodology described in ES Appendix 7.8: Technical Methodologies [<a href="#">AS-054</a>], which explains in paragraph 3.1.4 and Section 3.4 the presentational requirements of photomontages on drawing sheets, in accordance with Visual Representation of Development Proposals TGN 06/19<sup>2</sup>. As stated in paragraph 3.1.4 of ES Appendix 7.8, 'Where the horizontal field of view required to illustrate the Project exceeds 56°, photomontages have been presented on continuation sheets.' This methodology therefore follows industry standard and accepted best practice guidance to give a representative view.</p> <p><u>Assessment commentary</u></p> <p>In response to the photomontage at Representative Viewpoint S-03, a new Register of Environmental Actions and Commitments (REAC) commitment has been added to ES Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan, submitted at Deadline 7 [<b>Document Reference 6.3 ES Appendix 2.2 (7)</b>]:</p> <p><i>'LV037 Screening of views in Kent Downs AONB: In order to reduce visual effects in the opening year in the Kent Downs AONB to the north of Park Pale, the following mitigation measures would be implemented:</i></p> <ul style="list-style-type: none"> <li>• <i>Existing trees and hedgerow plants along the northern boundary of Park Pale (north-west of the Park Pale overbridge) would be retained as far as reasonably practicable during the installation of utilities associated with Work No. MU1. Existing trees and hedgerow plants situated south of the Harlex Haulage access track (Work No. 1C) and on both sides of the proposed diverted footpath NS161, extending up to the Park Pale overbridge and utility works (Work No. MU1), would also be retained as far as reasonably practicable. The protection of retained trees would be achieved through the implementation of an Arboricultural Method Statement (AMS) in accordance with LV028. The AMS will specify the tree protection measures which will be applied during construction. Protection measures may include access facilitation pruning, the erection of tree protection barriers and the arboricultural supervision of work that has the potential to cause damage to roots.</i></li> </ul>

<sup>2</sup> Landscape Institute (2019). Visual Representation of Development Proposals Technical Guidance Note 06/19. Accessed November 2023. [https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/09/LI\\_TGN-06-19\\_Visual\\_Representation.pdf](https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/09/LI_TGN-06-19_Visual_Representation.pdf).

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<ul style="list-style-type: none"> <li>Proposed planting within the ancient woodland compensation site north of Park Pale and Harlex Haulage identified on the Environmental Masterplan (Sheet 2 and 4 of Section 1, Figure 2.4, Application Document 6.2) would be undertaken, in part, at the earliest practicable planting season following commencement of authorised development. Early planting would be outside of the land required for construction and would maximise early screening, as well as being in accordance with the LEMP. The early planting would not be in areas identified as being suitable for ancient woodland soil receptor sites where prior translocation of soil is required.'</li> </ul> <p>This commitment has been included to address an increase in the visual impact assessment in ES Appendix 7.10: Schedule of Visual Effects [APP-385] from Representative Viewpoint S-03 at opening year (winter). As reported in the ES Addendum at Deadline 7 [Document Reference 9.8 (7)], the Applicant acknowledges that at opening year (winter) the Project would be noticeably more visible in the view. As a result of combining the very high sensitivity of this Representative Viewpoint with a moderate rather than negligible magnitude of effect, this would increase the visual effect reported in ES Appendix 7.10 from a slight adverse to a large adverse significance of effect at opening year (winter).</p> <p>This is considered to be a worst case assessment, as with the implementation of overarching REAC commitment LV001 in ES Appendix 2.2 [Document Reference 6.3 ES Appendix 2.2 (7)], which is related to the reduction in vegetation loss at detailed design, and the new REAC commitment described above, effects at opening year (winter) are likely to be lower.</p> <p>The increase in effect has, however, only been identified at opening year (winter); once planting has established in the ancient woodland compensation site, there would be beneficial screening provided of existing buildings at Harlex Haulage and infrastructure along the A2 and HS1 corridors. No change has therefore been identified in the visual impact assessment presented in ES Appendix 7.10 from Representative Viewpoint S-03 at design year (summer), with the significance level of visual effect assessed as moderate beneficial.</p> <p>This change in visual impact assessment significance does not affect the conclusions in relation to the assessment of National Policy Statement for National Networks (NPSNN)<sup>3</sup> paragraph 5.158 or the overall planning balance as set out in the Planning Statement [APP-495] or the assessment in relation to the AONB in Planning Statement Appendix F [APP-501].</p>

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

## 4 Medebridge Solar Limited

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
Update on Current Position	Medebridge Solar Limited	<p><b>Link to IP's submission:</b> Paragraphs 4 and 5 in <a href="#">[REP6-192]</a></p>
		<p><b>Applicant's response:</b> The Applicant is working closely with Medebridge Solar Limited to finalise the terms of a legal agreement between the parties. It is hoped the agreement will be complete prior to the end of Examination.</p>

## 5 Natural England

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
Cover letter and Annexes	Natural England	<p><b>Link to IP's submission:</b> Responding to all points in <a href="#">[REP6-152]</a></p> <p><b>Applicant's response:</b> Regarding the points raised by Natural England in their Deadline 6 submission <a href="#">[REP6-152]</a>, the Applicant has the following comments against each Annex within this submission:</p> <p>Annex 1: Post event submissions, including submission of oral comments made at the hearings during the weeks commencing 16 and 23 October 2023. The Applicant has responded to the points raised by Natural England in Annex 1 either at Deadline 6 or at Deadline 7 so will not be providing duplicate responses here.</p> <p>Annex 2: Natural England's delayed response to ExQ 11.5.1 from ExQ1 in relation to badgers. The Applicant has no further comment to make on Natural England's response.</p> <p>Annex 3: Natural England's delayed advice to the Applicant's response to ExQ 11.4.2 from ExQ1 in relation to the categorisation of bird species. Please refer to the Applicant's response in the row below.</p> <p>Annex 4: Responses to the Examination Questions 2 (sent under separate cover) The Applicant continues to work positively with Natural England to update the Statement of Common Ground between the two parties on these issues and this will be finalised no later than Deadline 8.</p> <p>Annex 5: Updated Statement of Common Ground The Applicant is working positively with Natural England to provide an updated Statement of Common Ground between the two parties at Deadline 7.</p>



Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>Annex 6: Updated Principal Areas of Disagreement The Applicant has no further comment to make on Natural England's response.</p> <p>Annex 7: Comments on the Applicant's submissions at Deadline 5. In relation to the comments regarding the photomontages submitted in Annex 7, please refer to the Applicant's response below.</p> <p>Annex 8: Natural England's response to the Action Points from Issue Specific Hearing 6 The Applicant has no further comment to make on Natural England's response.</p> <p>Annex 9: Any further information requested by the Examining Authority under Rule 17 of the EPR The Applicant has no further comment to make on Natural England's response.</p> <p>Annex 10: Any further information requested by the Examining Authority under Rule 17 of the EPR The Applicant has no further comment to make on Natural England's response.</p> <p>Annex 11: Request to attend November Issue Specific Hearings The Applicant has no further comment to make on Natural England's response.</p>
Cover letter and Annexes	Natural England	<p><b>Link to IP's submission:</b> Annex 3: Natural England's delayed advice to the Applicant's response to ExQ 11.4.2 from ExQ1 in relation to the categorisation of bird species, in <a href="#">[REP6-152]</a></p> <p><b>Applicant's response:</b></p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>In line with published good practice guidance<sup>4</sup> and the Design Manual for Roads and Bridges (DMRB) LA 108 Biodiversity<sup>5</sup>, the assessment reported in Environmental Statement (ES) Chapter 8: Terrestrial Biodiversity [APP-146], values the South Thames Estuary and Marshes Site of Special Scientific Interest (SSSI) as nationally important. This is reported in Table 8.8, together with the reasons for the site's designation that include breeding bird assemblages and invertebrates. Section 8.6, paragraphs 8.6.24 to 8.6.25, considers the effect on the ornithological interest at that SSSI in relation to the potential impacts from the Project.</p> <p>Separate to the valuation of importance and assessment of effects on the SSSI, the general ornithological assemblage within the zone of influence of the Project south of the River Thames is reported in paragraphs 8.4.39 to 8.4.51 and has been valued at county level importance. This valuation is summarised in Table 8.16 and is based on the wider ornithological assemblage recorded within the zone of influence of the Project south of the River Thames, and the geographic scale at which the loss of that assemblage would be felt.</p> <p>It is not the case that the ornithological interest within the SSSI is considered to be important at the county level. The ornithological interest of the SSSI is assessed as an integral part of the SSSI and any adverse effects to the bird species associated with the SSSI are therefore considered in relation to the maintenance of the site's integrity or its key characteristics.</p> <p>The assessment of likely significant effects on South Thames Estuary and Marshes SSSI, paragraphs 8.6.18 – 8.6.25, identifies that there would be no direct loss of habitat from within the SSSI, but identifies the potential for impacts to arise as a result of noise and visual disturbance to qualifying species, including bird species, and particularly around the Milford Compound which lies approximately 120m to the west and 30m to the north of the boundary of the SSSI, separated from the SSSI by the Gravesend to Higham railway line, and the A226 Gravesend Road Compound separated from the SSSI boundary by the Lower Higham Road. The Metropolitan Police firing range also lies immediately north of the compound.</p> <p>The road, railway and firing range are a source of frequent but irregular noise and visual disturbance to any birds within the SSSI which would therefore likely be habituated to such disturbance. Only three of the species listed in the SSSI citation have been recorded during the breeding season within the zone of influence of the Project as it overlaps with the SSSI boundary: pintail; garganey; and ruff. The breeding season records for each of these three species were recorded over 500m from the boundary of the Milton Compound (ES</p>

<sup>4</sup> CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2. Chartered Institute of Ecology and Environmental Management, Winchester

<sup>5</sup> Highways England (2020). Design Manual for Roads and Bridges: LA 108 Biodiversity. Accessed November 2023.  
<http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/section3/LA%20108%20Biodiversity-web.pdf>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>Appendix 8.7: Ornithology [<a href="#">APP-396</a>] and ES Figure 8.15: Functionally Linked Land Transects – Breeding [<a href="#">APP-276</a>):</p> <ul style="list-style-type: none"> <li>• Pintail: 520m (closest record to the edge of a compound location (Milton Compound))</li> <li>• Garganey: 1,187m (closest record to the edge of a compound location (Milton Compound))</li> <li>• Ruff: 1,204m (closest record to the edge of a compound location (Milton Compound))</li> </ul> <p>The assessment identifies that potential impacts from noise and visual disturbance to birds within the SSSI would be mitigated through the provision of noise-attenuating barriers approximately 3m in height. These are secured through commitment HRA004 in the Register of Environmental Actions and Commitments (REAC), within the Code of Construction Practice, First iteration of Environmental Management Plan [<a href="#">REP6-038</a>], and would function as noise attenuation and visual screening for over-wintering, breeding and specially protected birds listed as part of the SSSI citation. Further REAC commitments TB002, TB004 and TB006 address potential disturbance issues to sensitive ecological receptors including breeding birds through the provision and supervision of works such as fence installation by an Environmental Clerk of Works. In particular, TB004 states that, where timing of disturbing works is not possible, appropriate measures would be taken to avoid harming birds or their nests and this would be supervised by an Environmental Clerk of Works.</p> <p>The assessment concludes that, with the implementation of this mitigation, there is still potential for some disturbance but that this would be temporary and would not affect the integrity of the nationally important site or its key characteristics, including those of the breeding bird assemblage associated with the site. This impact would therefore result in a reversible negligible adverse impact that would lead to a slight adverse effect on a nationally important receptor which is not significant. This conclusion is reported in ES Chapter 8 [<a href="#">APP-146</a>] paragraph 8.6.24 and 8.6.25.</p> <p>With respect to macro-invertebrates, paragraphs 8.6.82 – 8.6.84 report on the potential impacts of the Project's construction on water quality and water levels within the ditch network which supports the macro-invertebrate assemblages within both the nationally important South Thames Estuary and Marshes SSSI and the internationally important Thames Estuary and Marshes SPA and Ramsar site. This concludes that there would be no impact on water quality or water levels and therefore no corresponding impact on the macro-invertebrate assemblages associated with the nationally and internationally important sites, leading to effects which would be neutral and not significant.</p> <p>It is therefore the Applicant's position that the assessment of likely significant effects clearly identifies the impacts and effects on designated sites and their qualifying features, and on other relevant ecological</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		receptors outwith designated sites, and that this is in line with relevant good practice guidance and DMRB standards.
Cover letter and Annexes	Natural England	<p><b>Link to IP's submission:</b> In relation to the comments regarding the photomontages within Annex 7 in <a href="#">[REP6-152]</a></p> <p><b>Applicant's response:</b> <u>Number of photomontage sheets</u> The photomontages have been prepared in accordance with the methodology described in Environmental Statement (ES) Appendix 7.8: Technical Methodologies <a href="#">[AS-054]</a>, which explains in paragraph 3.1.4 and Section 3.4 the presentational requirements of photomontages on drawing sheets, in accordance with Visual Representation of Development Proposals TGN 06/19<sup>6</sup>. As stated in paragraph 3.1.4 of ES Appendix 7.8, 'Where the horizontal field of view required to illustrate the Project exceeds 56°, photomontages have been presented on continuation sheets.' This methodology therefore follows industry standard and accepted best practice guidance to give a representative view.</p> <p><u>Baseline photography</u> The existing hedgerow and scrub planting along the boundary of Harlex Haulage has not been reduced or omitted from the baseline photography at Representative Viewpoint S-03; the existing vegetation has grown since the baseline photography was undertaken.</p> <p>A review of existing baseline photography was undertaken in 2021 to determine Representative Viewpoints where the visual baseline had changed since initial survey work, with additional photography undertaken in some locations, as stated in paragraph 7.3.73 of ES Chapter 7: Landscape and Visual <a href="#">[APP-145]</a>. The additional photography was undertaken in areas where there had been the greatest potential for change in the visual baseline, such as in the Tilbury area. Generally, growth of existing vegetation was considered unlikely to result in a notable change in existing views, except in areas such as Jeskyns Community Woodland where newly establishing woodland areas had a greater chance of affecting the character of existing views. The Applicant accepts that growth of existing vegetation would have occurred between 2019 and 2022 at all Representative Viewpoints. However, this is not considered to affect the visual impact assessment at Representative Viewpoint S-03 for the following reasons:</p>

<sup>6</sup> Landscape Institute (2019). Visual Representation of Development Proposals Technical Guidance Note 06/19. Accessed November 2023. [https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/09/LI\\_TGN-06-19\\_Visual\\_Representation.pdf](https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2019/09/LI_TGN-06-19_Visual_Representation.pdf).

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<ul style="list-style-type: none"> <li>• Baseline 2023 winter: Buildings at Harlex Haulage would still be visible in winter, as the planting belt along the boundary of Harlex Haulage would not be dense enough to screen views. A2 and HS1 infrastructure would also still be visible.</li> <li>• Baseline 2023 summer: Buildings at Harlex Haulage and A2 and HS1 infrastructure would still be visible in the summer view, so any screening provided by proposed planting would result in a beneficial change.</li> </ul> <p><u>Landscape character and views</u></p> <p>Paragraph 5.3.4 of the outline Landscape and Ecology Management Plan [REP4-140] states that the management requirements of the ancient woodland compensation site to the east of Brewers Wood are:</p> <ul style="list-style-type: none"> <li>• <i>'to provide woodland linking Shorne Woods SSSI with Great Crabbles Wood SSSI...</i></li> <li>• <i>to provide woodland for screening of the Project route whilst retaining key views from the upper slopes of new woodland across to the Darnley Mausoleum</i></li> <li>• <i>to establish open rides and glades along utility diversion routes and along the proposed footpath routes for public access</i></li> <li>• <i>to provide a structurally diverse and graduated woodland edge to the rides'</i></li> </ul> <p>In line with the management requirements stated above, the photomontage at Representative Viewpoint S-03 submitted in ES Figure 7.19 [REP5-046] illustrates proposed woodland areas bordered by a graduated woodland edge, an open ride along footpath NS161 and the retention of views towards Darnley Mausoleum and woodland within Cobham Hall Registered Park and Garden. The management requirements would ensure the proposed planting is in keeping with local landscape character and views as far as reasonably practicable. It is also noted that the detailed design of planting in this area would be developed with Shorne Woods Country Park, Natural England, Kent Downs Area of Outstanding Natural Beauty (AONB) Unit and relevant local stakeholders, as stated in clause S1.08 of the Design Principles [REP6-046] and paragraphs 4.1.13 and 4.1.14 of the outline Landscape and Ecology Management Plan [REP4-140].</p> <p><u>Year 15 photomontage views</u></p> <p>The summer year 15 photomontages at Representative Viewpoint S-03 submitted in ES Figure 7.19 [REP6-036] illustrate the screening of buildings at Harlex Haulage and A2 and HS1 infrastructure provided by proposed planting. In addition, Sheet 4 illustrates a limited change in visual enclosure at year 15, with mid-range views remaining towards a group of existing veteran trees and long-range views remaining towards the Darnley Mausoleum within the Kent Downs AONB south of the A2 corridor. It is therefore not considered that</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>views south-west from Representative Viewpoint S-03 would be as affected as stated by Natural England in their Deadline 6 submission [<a href="#">REP6-152</a>].</p> <p><u>Assessment commentary</u></p> <p>In response to the photomontage at Representative Viewpoint S-03, a new Register of Environmental Actions and Commitments (REAC) commitment has been added to ES Appendix 2.2: Code of Construction Practice, First Iteration of Environmental Management Plan, submitted at Deadline 7 [<b>Document Reference 6.3 ES Appendix 2.2 (7)</b>]:</p> <p><i>'LV037 Screening of views in Kent Downs AONB: In order to reduce visual effects in the opening year in the Kent Downs AONB to the north of Park Pale, the following mitigation measures would be implemented:</i></p> <ul style="list-style-type: none"> <li>• <i>Existing trees and hedgerow plants along the northern boundary of Park Pale (north-west of the Park Pale overbridge) would be retained as far as reasonably practicable during the installation of utilities associated with Work No. MU1. Existing trees and hedgerow plants situated south of the Harlex Haulage access track (Work No. 1C) and on both sides of the proposed diverted footpath NS161, extending up to the Park Pale overbridge and utility works (Work No. MU1), would also be retained as far as reasonably practicable. The protection of retained trees would be achieved through the implementation of an Arboricultural Method Statement (AMS) in accordance with LV028. The AMS will specify the tree protection measures which will be applied during construction. Protection measures may include access facilitation pruning, the erection of tree protection barriers and the arboricultural supervision of work that has the potential to cause damage to roots.</i></li> <li>• <i>Proposed planting within the ancient woodland compensation site north of Park Pale and Harlex Haulage identified on the Environmental Masterplan (Sheet 2 and 4 of Section 1, Figure 2.4, Application Document 6.2) would be undertaken, in part, at the earliest practicable planting season following commencement of authorised development. Early planting would be outside of the land required for construction and would maximise early screening, as well as being in accordance with the LEMP. The early planting would not be in areas identified as being suitable for ancient woodland soil receptor sites where prior translocation of soil is required.'</i></li> </ul> <p>This commitment has been included to address an increase in the visual impact assessment in ES Appendix 7.10: Schedule of Visual Effects [<a href="#">APP-385</a>] from Representative Viewpoint S-03 at opening year (winter). As reported in the ES Addendum at Deadline 7 [<b>Document Reference 9.8 (7)</b>], the Applicant acknowledges that at opening year (winter) the Project would be noticeably more visible in the view. As a result of combining the very high sensitivity of this Representative Viewpoint with a moderate rather than negligible magnitude of</p>

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		<p>effect, this would increase the visual effect reported in ES Appendix 7.10 from a slight adverse to a large adverse significance of effect at opening year (winter).</p> <p>This is considered to be a worst case assessment, as with the implementation of overarching REAC commitment LV001 in ES Appendix 2.2 [<b>Document Reference 6.3 ES Appendix 2.2 (7)</b>], which is related to the reduction in vegetation loss at detailed design, and the new REAC commitment described above, effects at opening year (winter) are likely to be lower.</p> <p>The increase in effect has, however, only been identified at opening year (winter); once planting has established in the ancient woodland compensation site, there would be beneficial screening provided of existing buildings at Harlex Haulage and infrastructure along the A2 and HS1 corridors. No change has therefore been identified in the visual impact assessment presented in ES Appendix 7.10 from Representative Viewpoint S-03 at design year (summer), with the significance level of visual effect assessed as moderate beneficial.</p> <p>This change in visual impact assessment significance does not affect the conclusions in relation to the assessment of National Policy Statement for National Networks (NPSNN)<sup>7</sup> paragraph 5.158 or the overall planning balance as set out in the Planning Statement [<a href="#">APP-495</a>] or the assessment in relation to the AONB in Planning Statement Appendix F [<a href="#">APP-501</a>].</p>

<sup>7</sup> Department for Transport (2014). National Policy Statement for National Networks.



## 6 Thames Crossing Action Group

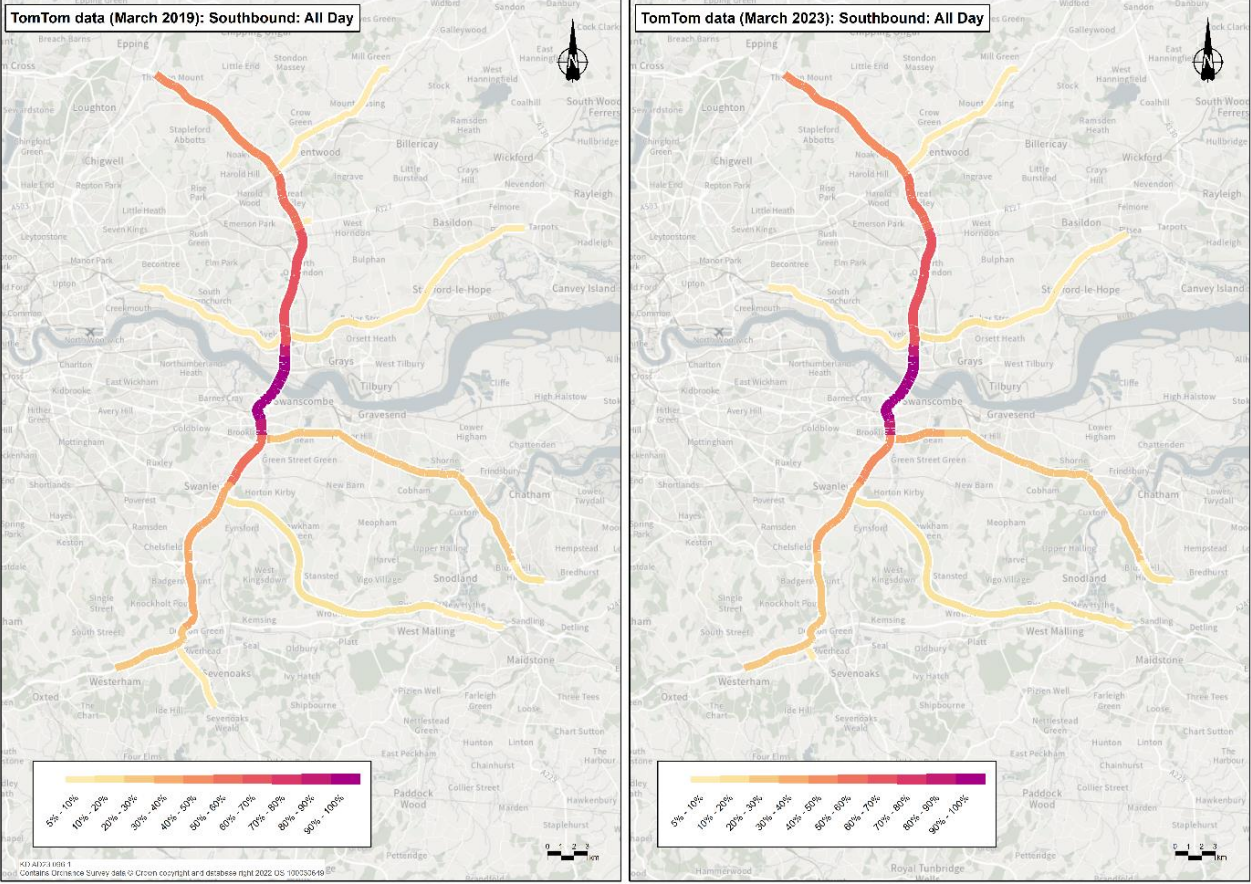
Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
Comments in response to D5 submissions and post-event submissions	Thames Crossing Action Group	<p><b>Link to IP's submission:</b> Point 30 in <a href="#">[REP6-204]</a></p> <p><b>Applicant's response:</b> The Applicant reviewed all submissions made by Interested Parties into the Examination. Where the Applicant determined it would assist the Examining Authority and Examination process (e.g. where relevant information or a relevant response had not already been submitted by the Applicant), then a response has been provided to ensure that the Examining Authority and the Secretary of State have appropriate information to make their determination. The Applicant has provided substantial comments in response to stakeholders throughout the Examination and has not just focused on the draft Development Consent Order (DCO) <a href="#">[REP6-010]</a>. It should be noted that comments on the draft DCO were either requested by the Examining Authority, or necessary as a response to comments from IPs on the DCO.</p>

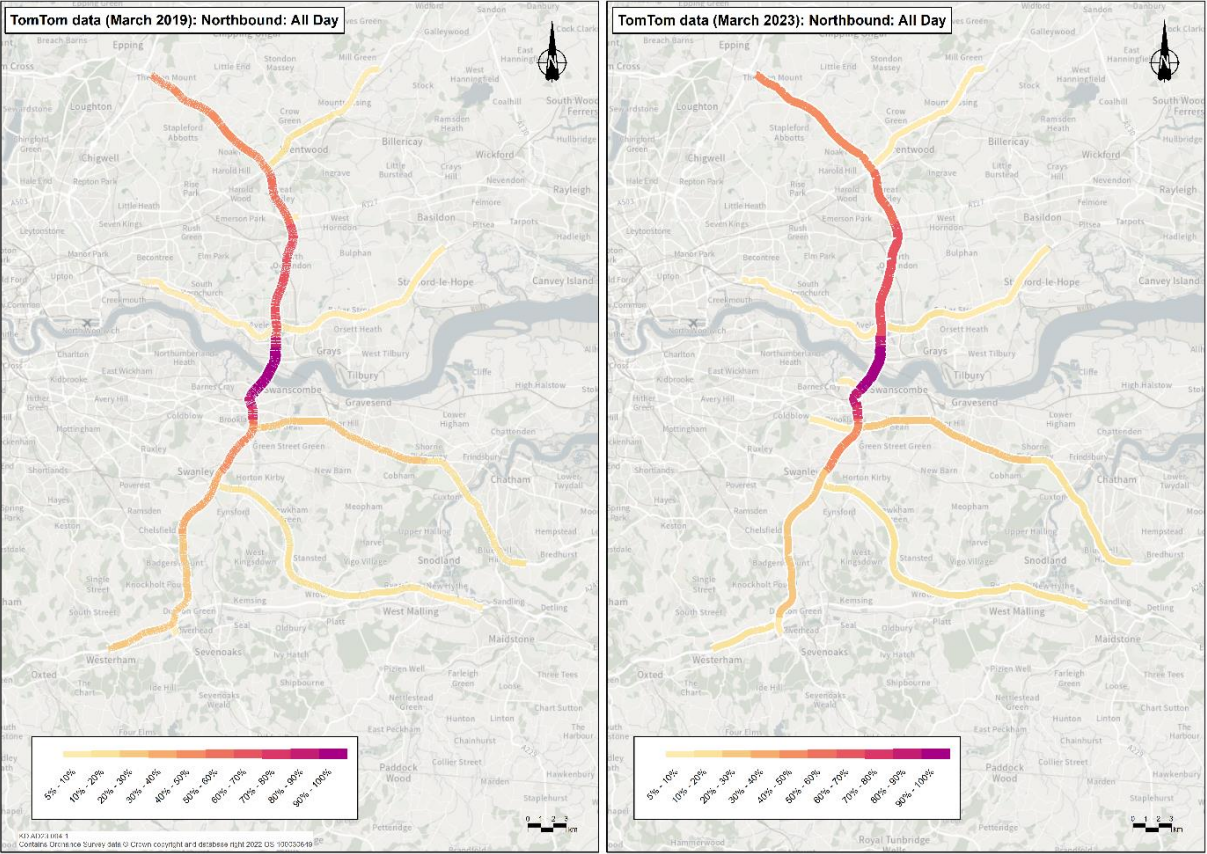


## 7 Thurrock Council

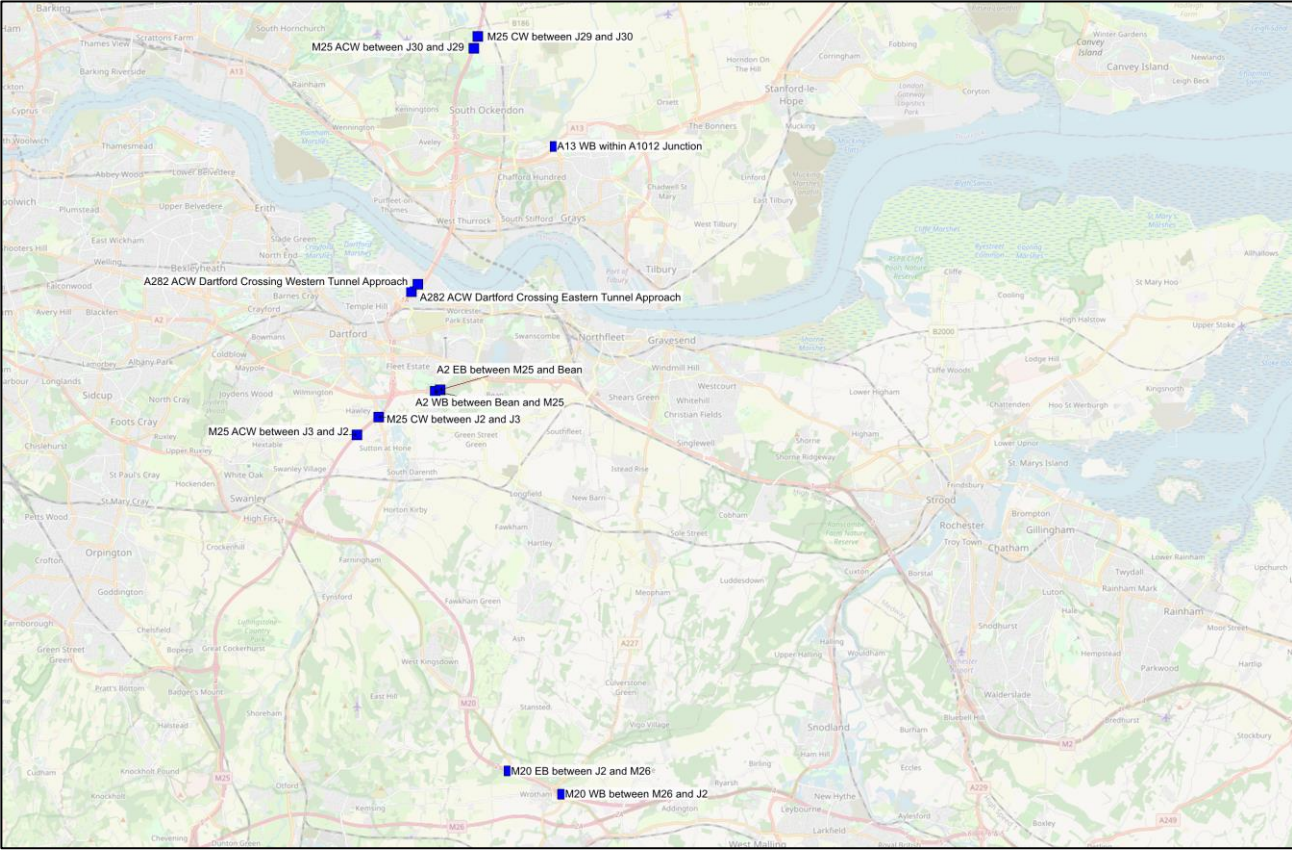
Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
<p>Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5)</p>	<p>Thurrock Council</p>	<p><b>Link to IP's submission:</b> Responding to traffic matters within <a href="#">[REP6-164]</a></p> <p><b>Applicant's response:</b> The following provides a response to the Council's comments within Thurrock Council's Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5) <a href="#">[REP6-164]</a>, submitted at Deadline 6, in relation to comments made by the Applicant in:</p> <ul style="list-style-type: none"> <li>• Applicant's Post-event submissions, including written submission of oral comments, for ISH4 <a href="#">[REP4-180]</a> – specifically Section A.7</li> <li>• ExQ1_Q4.1.2 Modelled traffic effects: Covid <a href="#">[REP4-189]</a></li> <li>• ExQ1_Q5.1.1 Air Quality: Baseline <a href="#">[REP4-190]</a></li> </ul> <p>The Council has in each of the above areas of their response to comments made by the Applicant noted (either explicitly or implicitly) that the Applicant has quoted outputs from TomTom data upon which the Applicant has stated that '<i>traffic levels have returned after COVID, and the pattern of travel on the highway network in the area remains similar to that observed in 2016</i>'. The Council has noted that the TomTom data is not before the Examination and so are "<i>not in a position to agree the analysis or findings</i>". The Applicant has therefore presented details of the analysis it has undertaken using the TomTom data, as well as from National Highways TRIS count locations below.</p> <p>The Applicant also notes that the Council has stated that it considers that the Applicant is claiming, through the above quote, that there has been no change in traffic levels between 2016 and 2023. This is incorrect. The Applicant was asserting that, traffic volumes (particularly on the strategic road network, but also on the local road network) have already returned to, and in some cases exceed, levels seen before the COVID-19 pandemic. This is important to note, as there was concern that traffic volumes would never recover.</p>

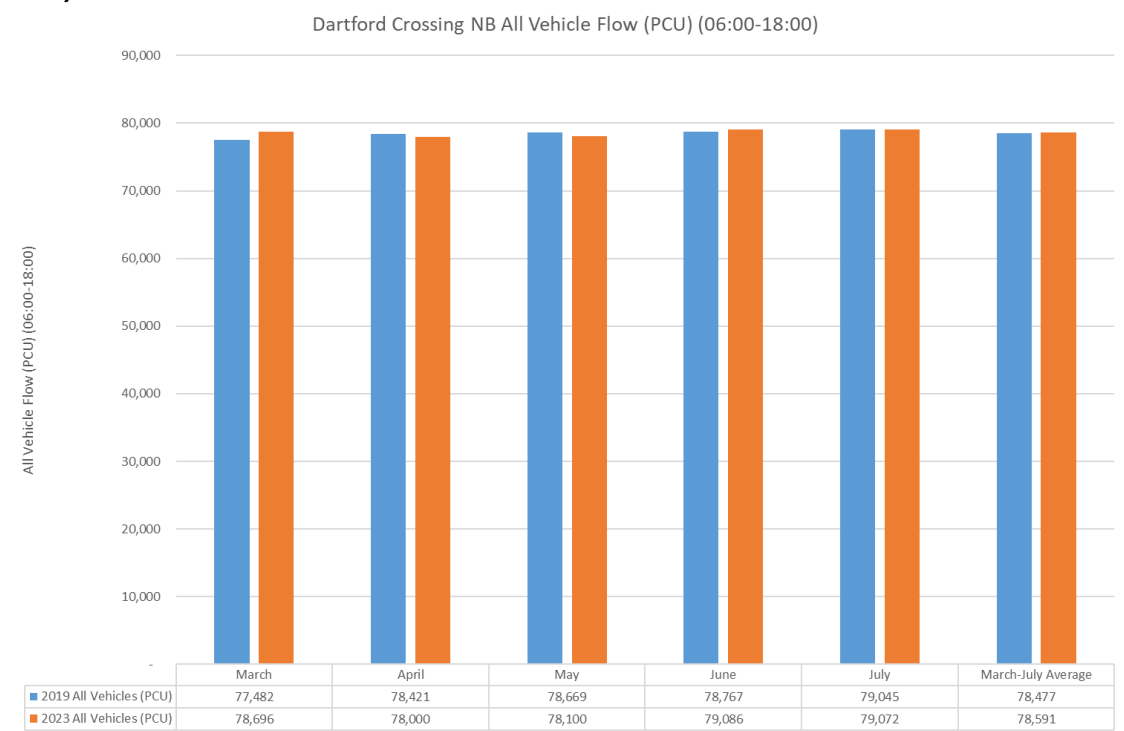
Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>In response to the Council's comments about changes to fleet composition (uptake of electric vehicles as well as renewal of fleet and phasing out of older diesel and petrol vehicles), particularly the delay to the proposed ban on the sale of new petrol and diesel car, the Applicant provided a response in answer to ExQ2_Q5.1.1 and ExQ2_Q5.2.1 within Responses to the Examining Authority's ExQ2 Appendix C: 5 Air Quality [<a href="#">REP6-109</a>]. The fleet mix assumptions within Emissions Factors Toolkit Version 11 (EFTv11) are based on the Department for Transport's Transport Analysis Guidance (TAG) Data Book sheet A1.3.9 version 1.17. This version of the TAG Data Book and EFTv11 does not take account of the government's previous policy of ending the sale of petrol and diesel cars by 2030. Therefore, the Applicant's air quality assessment presented in ES Chapter 5 [<a href="#">APP-143</a>] is not impacted by the recent policy change, delaying the phase out date to 2035.</p> <p><b><u>Assessment of the impact of the COVID-19 pandemic on travel behaviour</u></b></p> <p><b>Introduction</b></p> <p>In order to assess the impact of the COVID-19 pandemic on travel behaviour in the vicinity of the Dartford Crossing, a series of different data sources have been obtained for 2019 and 2023. The sections below describe the data obtained and the analysis that has been undertaken.</p> <p><b>Select Link Analysis</b></p> <p>Select Link Analysis data for the Dartford Crossing was procured from TomTom for March 2019 and March 2023. Select Link Analysis data shows the pattern of movements that were using a particular section of road. The figures below show comparisons between the patterns of movement using the Dartford Crossing in 2019 (left side) and those in 2023 (right side). Figure 1 shows the pattern of movement using the crossing southbound. The data is presented for All Day movements for what is known as "Passenger Traffic" in the TomTom data.</p>


Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p><b>Figure 1 TomTom March 2019 vs TomTom March 2023, All Day Passenger Traffic, Southbound</b></p>  <p>Figure 2 shows the same data, but this time based on northbound movements (for both tunnels) using the Dartford Crossing.</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p><b>Figure 2 TomTom March 2019 Vs TomTom March 2023, All Day Passenger Traffic, Northbound (both tunnels)</b></p>  <p>The figures show a very close match between the 2019 and 2023 data for both southbound and northbound trips. It is clear to see that on the south side of the River Thames the vast majority of users of the Dartford Crossing are coming from or going to Kent. On the north side of the river, the majority of users are continuing along the M25.</p>



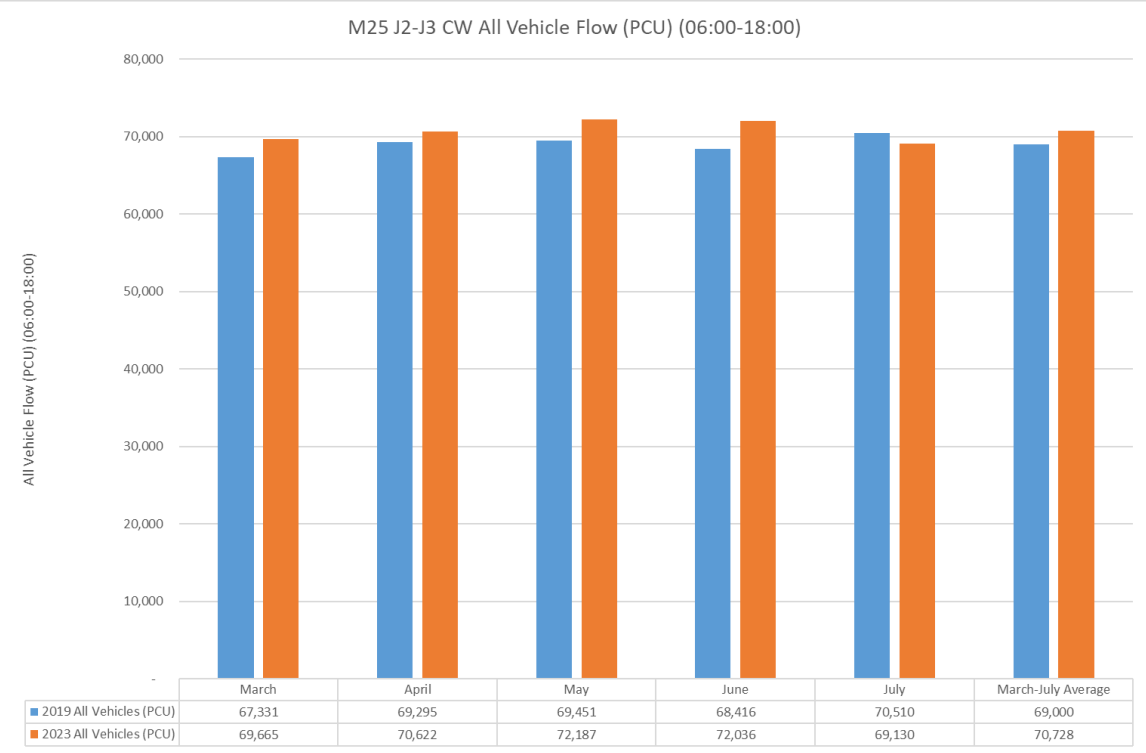
Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p><b>National Highways TRIS count data</b></p> <p>A selection of traffic counts has been identified and analysed. The data used includes a series of TRIS traffic counts on the primary corridors around the Dartford Crossing. The analysis presented below is on the basis of “neutral days” only. The analysis shows comparisons between spring/summer months in 2019 and 2023. Figure 3 shows the locations of the TRIS traffic counts used in this analysis.</p> <p><b>Figure 3 TRIS count locations</b></p>  <p>The following sections provide the comparisons between 2019 and 2023 flows at each of these locations.</p>

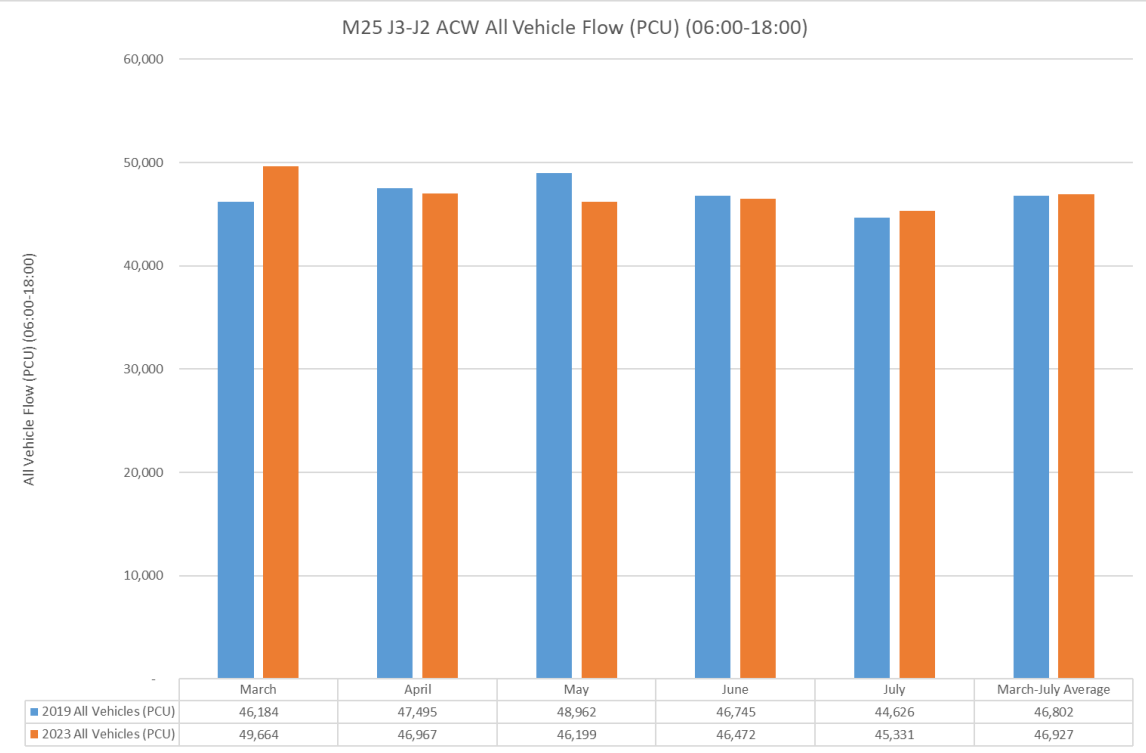
Document title	Interested Party (IP)	Link to IP’s submission / Applicant’s response																					
		<p><b>Dartford Crossing northbound (both tunnels)</b></p> <p>Figure 4 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday vehicular flow in Passenger Car Units (PCUs) at this location.</p> <p>There are currently no active TRIS count sites on the Dartford Crossing in a southbound direction.</p> <p><b>Figure 4 Dartford Crossing northbound, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p>  <table border="1" data-bbox="667 1173 1742 1236"> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>77,482</td> <td>78,421</td> <td>78,669</td> <td>78,767</td> <td>79,045</td> <td>78,477</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>78,696</td> <td>78,000</td> <td>78,100</td> <td>79,086</td> <td>79,072</td> <td>78,591</td> </tr> </tbody> </table> <p>This analysis shows that the 2023 northbound traffic flow at the Dartford Crossing is very close to the flows in 2019. The largest monthly difference is in March where the 2023 flows are 2% higher than in 2019. Looking at the average across the five months, the difference between the two years is less than 1%, with 2023 being higher than 2019.</p>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	77,482	78,421	78,669	78,767	79,045	78,477	2023 All Vehicles (PCU)	78,696	78,000	78,100	79,086	79,072	78,591
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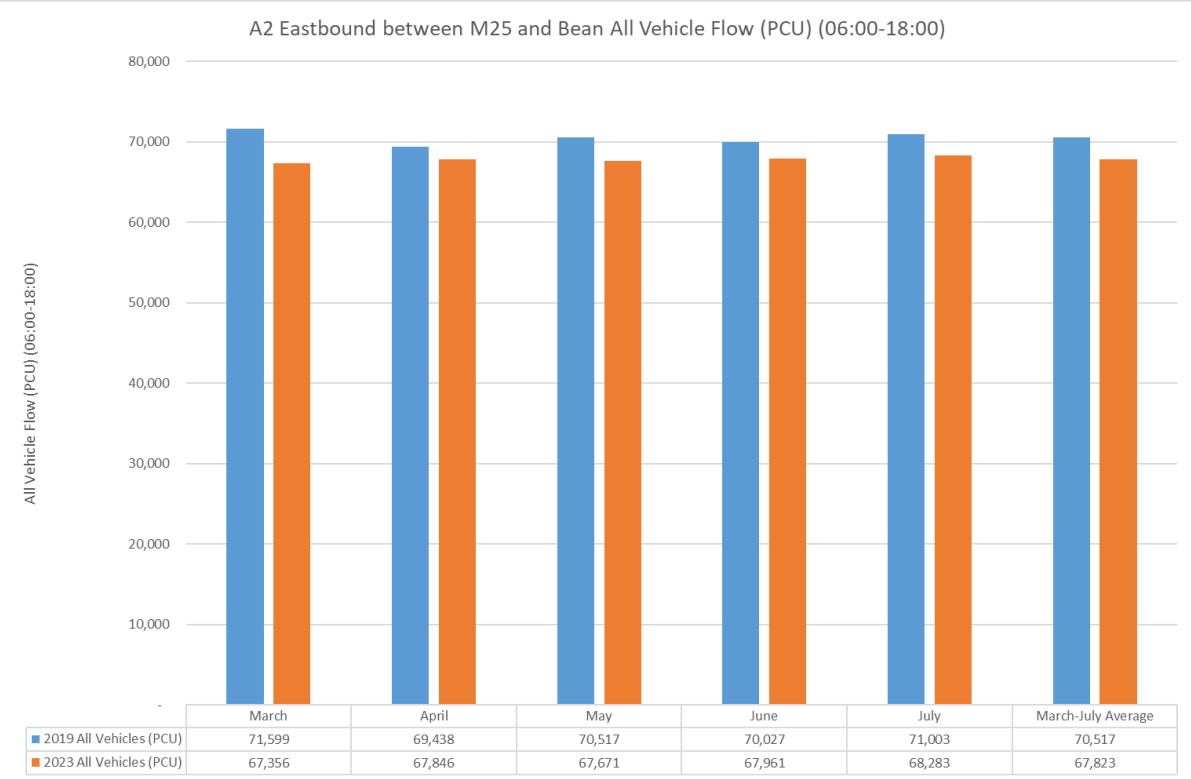
Document title	Interested Party (IP)	Link to IP's submission / Applicant's response																					
		<p><b>M25 clockwise between junction 29 and junction 30</b></p> <p>Figure 5 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday flow in PCUs at this location.</p> <p><b>Figure 5 M25 clockwise between junction 29 and junction 30, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p>  <table border="1" data-bbox="667 1145 1771 1217"> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>54,589</td> <td>55,506</td> <td>56,591</td> <td>57,049</td> <td>56,668</td> <td>56,081</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>53,041</td> <td>55,511</td> <td>54,790</td> <td>56,545</td> <td>55,208</td> <td>55,019</td> </tr> </tbody> </table> <p>This analysis shows that flows in 2023 at this location are very close to the flows in 2019. The largest monthly difference is in May where the 2023 flows are 3% lower than in 2019. Looking at the average across the five months, the difference between the two years is less than 2%, with 2023 being lower than 2019.</p>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	54,589	55,506	56,591	57,049	56,668	56,081	2023 All Vehicles (PCU)	53,041	55,511	54,790	56,545	55,208	55,019
	March	April	May	June	July	March-July Average																	
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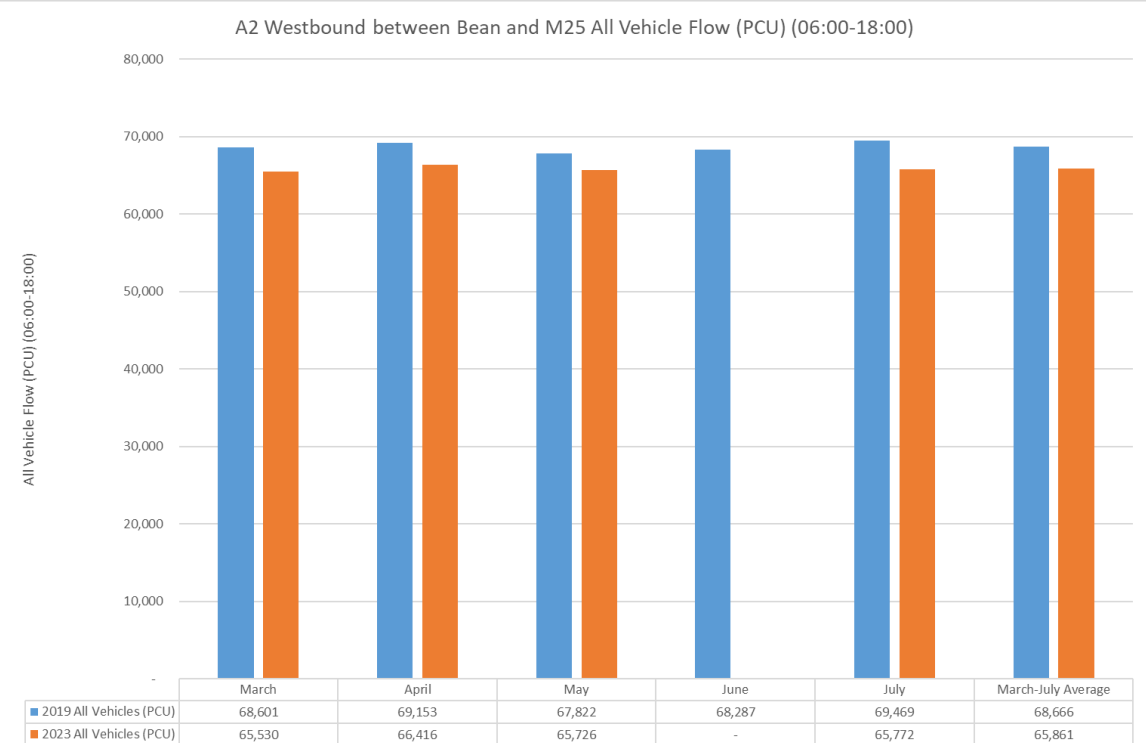
Document title	Interested Party (IP)	Link to IP's submission / Applicant's response																					
		<p><b>M25 anticlockwise between junction 30 and junction 29</b></p> <p>Figure 6 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday flow in PCUs at this location.</p> <p><b>Figure 6 M25 anticlockwise between junction 30 and junction 29, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p> <table border="1" data-bbox="651 464 1787 1219"> <caption>M25 J30-J29 ACW All Vehicle Flow (PCU) (06:00-18:00)</caption> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>71,664</td> <td>72,631</td> <td>72,909</td> <td>74,419</td> <td>76,045</td> <td>73,534</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>71,404</td> <td>72,903</td> <td>73,072</td> <td>73,169</td> <td>74,639</td> <td>73,037</td> </tr> </tbody> </table> <p>This analysis shows that flows in 2023 at this location are very close to the flows in 2019. The largest monthly difference is in July where the 2023 flows are 2% lower than in 2019. Looking at the average across the five months, the difference between the two years is less than 1%, with 2023 being lower than 2019.</p>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	71,664	72,631	72,909	74,419	76,045	73,534	2023 All Vehicles (PCU)	71,404	72,903	73,072	73,169	74,639	73,037
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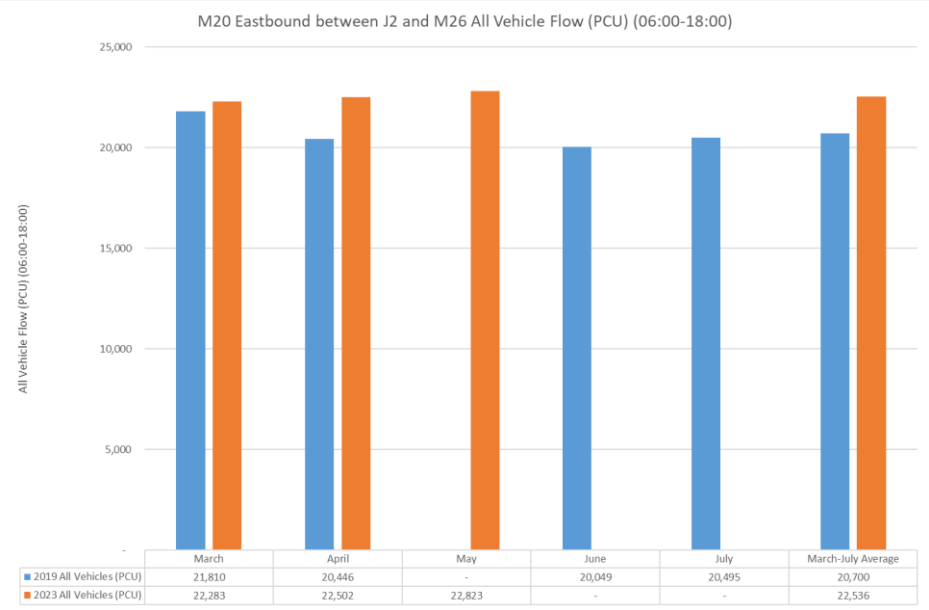
Document title	Interested Party (IP)	Link to IP's submission / Applicant's response																					
		<p><b>M25 clockwise between junction 2 and junction 3</b></p> <p>Figure 7 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday flow in PCUs at this location.</p> <p><b>Figure 7 M25 clockwise between junction 2 and junction 3, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p>  <table border="1" data-bbox="667 1145 1771 1220"> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>67,331</td> <td>69,295</td> <td>69,451</td> <td>68,416</td> <td>70,510</td> <td>69,000</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>69,665</td> <td>70,622</td> <td>72,187</td> <td>72,036</td> <td>69,130</td> <td>70,728</td> </tr> </tbody> </table> <p>This analysis shows that flows in 2023 at this location are close to the flows in 2019. The largest monthly difference is in June where the 2023 flows are 5% higher than in 2019. Looking at the average across the five months, the difference between the two years is approximately 2.5%, with 2023 being higher than 2019.</p>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	67,331	69,295	69,451	68,416	70,510	69,000	2023 All Vehicles (PCU)	69,665	70,622	72,187	72,036	69,130	70,728
	March	April	May	June	July	March-July Average																	
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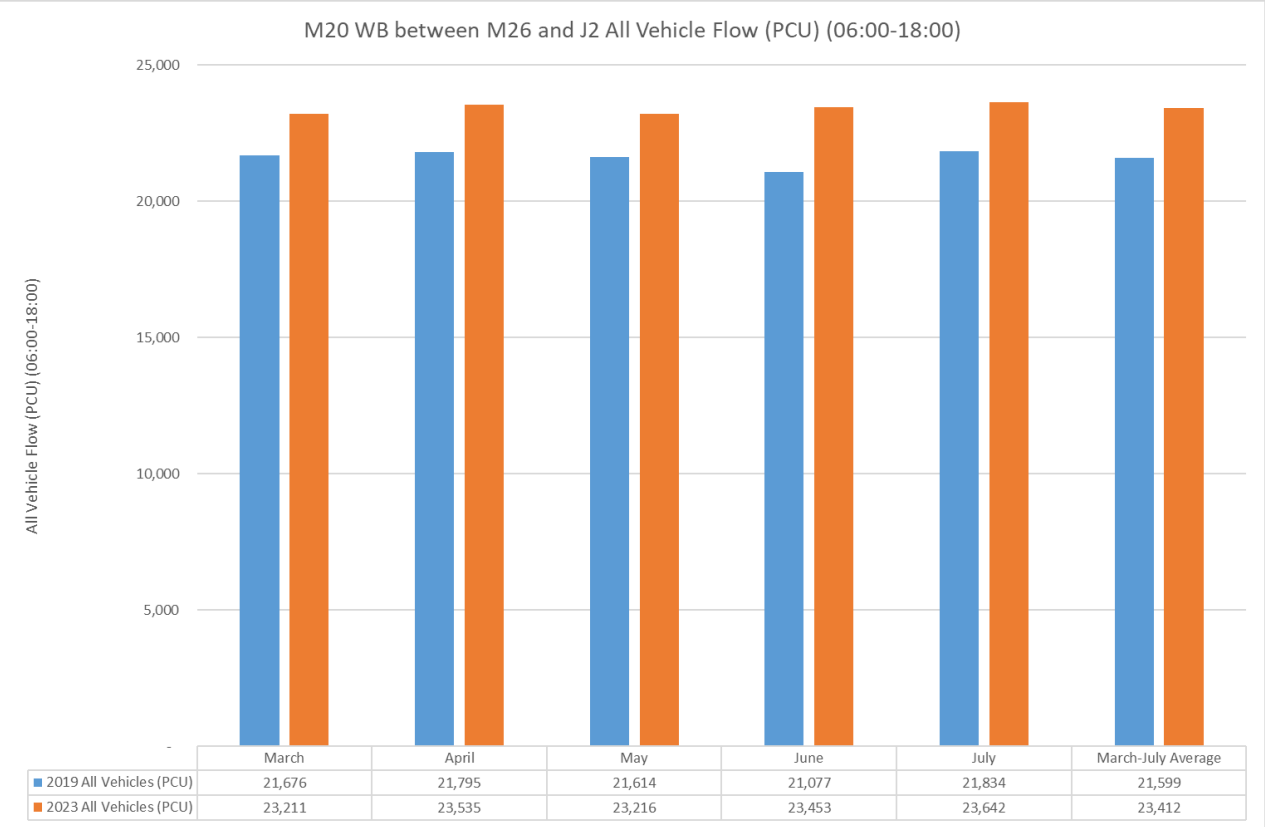
Document title	Interested Party (IP)	Link to IP's submission / Applicant's response																					
		<p><b>M25 anticlockwise between junction 3 and junction 2</b></p> <p>Figure 8 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday flow in PCUs at this location.</p> <p><b>Figure 8 M25 anticlockwise between junction 3 and junction 2, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p>  <table border="1" data-bbox="667 1145 1771 1220"> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>46,184</td> <td>47,495</td> <td>48,962</td> <td>46,745</td> <td>44,626</td> <td>46,802</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>49,664</td> <td>46,967</td> <td>46,199</td> <td>46,472</td> <td>45,331</td> <td>46,927</td> </tr> </tbody> </table> <p>This analysis shows that flows in 2023 at this location are close to the flows in 2019. The largest monthly difference is in March where the 2023 flows are 8% higher than in 2019. Looking at the average across the five months, the difference between the two years is less than 1%, with 2023 being higher than 2019.</p>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	46,184	47,495	48,962	46,745	44,626	46,802	2023 All Vehicles (PCU)	49,664	46,967	46,199	46,472	45,331	46,927
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Document title	Interested Party (IP)	Link to IP’s submission / Applicant’s response																					
		<p><b>A2 eastbound between the M25 and Bean</b></p> <p>Figure 9 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday flow in PCUs at this location.</p> <p><b>Figure 9 A2 eastbound between the M25 and Bean, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p>  <table border="1" data-bbox="645 1169 1816 1246"> <caption>A2 Eastbound between M25 and Bean All Vehicle Flow (PCU) (06:00-18:00)</caption> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>71,599</td> <td>69,438</td> <td>70,517</td> <td>70,027</td> <td>71,003</td> <td>70,517</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>67,356</td> <td>67,846</td> <td>67,671</td> <td>67,961</td> <td>68,283</td> <td>67,823</td> </tr> </tbody> </table> <p>This analysis shows that flows in 2023 at this location are lower than the flows in 2019. The largest monthly difference is in March where the 2023 flows are 6% lower than in 2019. Looking at the average across the five months, the difference between the two years is approximately 4%, with 2023 lower than 2019.</p>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	71,599	69,438	70,517	70,027	71,003	70,517	2023 All Vehicles (PCU)	67,356	67,846	67,671	67,961	68,283	67,823
	March	April	May	June	July	March-July Average																	
2019 All Vehicles (PCU)	71,599	69,438	70,517	70,027	71,003	70,517																	
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Document title	Interested Party (IP)	Link to IP's submission / Applicant's response																					
		<p>In 2019, National Highways was constructing a Smart Motorways scheme on the M20 between junction 3 and junction 5. This would have led to delays on the M20 which would have resulted in some longer distance travellers rerouting onto the A2/M2 corridor from the M20, leading to increased flows on the A2/M2 and reduced flows on the M20 in 2019. The analysis presented above therefore needs to be viewed in that context.</p> <p><b>A2 westbound between Bean and the M25</b></p> <p>Figure 10 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday flow in PCUs at this location.</p> <p><b>Figure 10 A2 westbound between Bean and the M25, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p>  <table border="1" data-bbox="645 608 1787 1353"> <caption>A2 Westbound between Bean and M25 All Vehicle Flow (PCU) (06:00-18:00)</caption> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>68,601</td> <td>69,153</td> <td>67,822</td> <td>68,287</td> <td>69,469</td> <td>68,666</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>65,530</td> <td>66,416</td> <td>65,726</td> <td>-</td> <td>65,772</td> <td>65,861</td> </tr> </tbody> </table>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	68,601	69,153	67,822	68,287	69,469	68,666	2023 All Vehicles (PCU)	65,530	66,416	65,726	-	65,772	65,861
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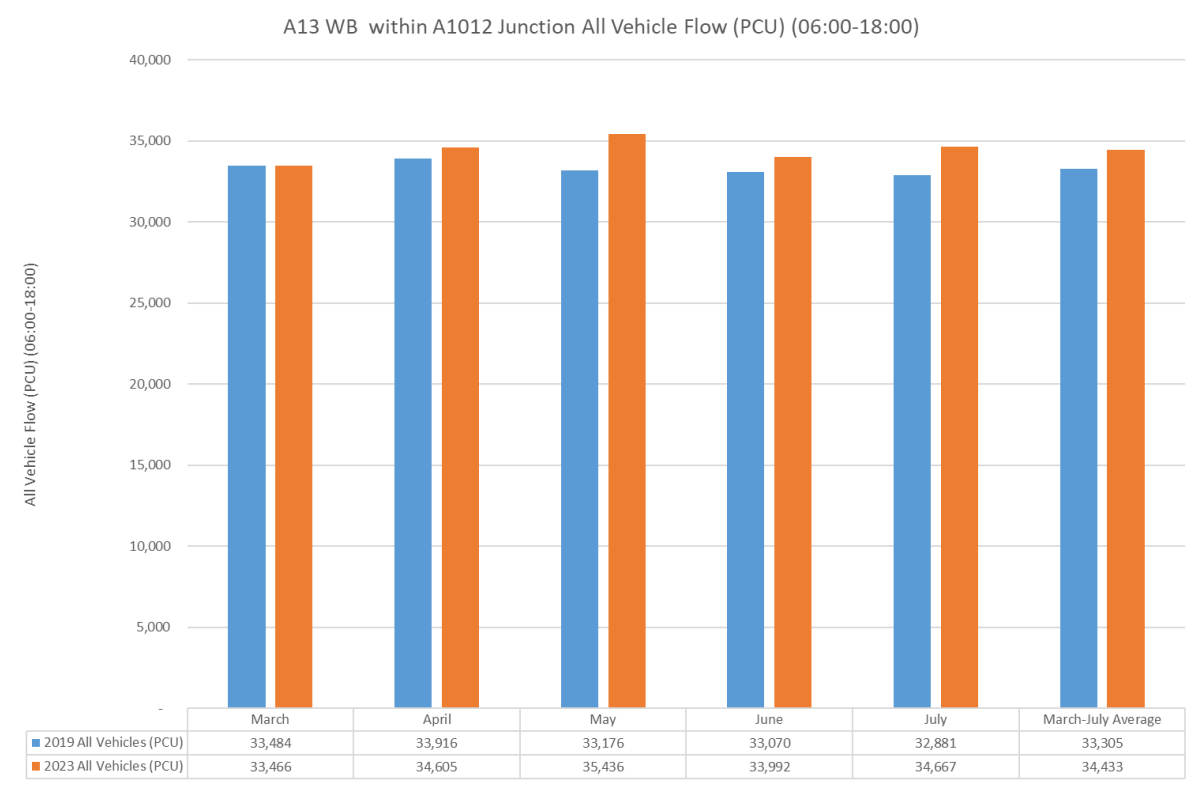
Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>Data was not available from June 2023. This analysis shows that flows in 2023 at this location are lower than the flows in 2019. The largest monthly difference is in July where the 2023 flows are 5% lower than in 2019. Looking at the average across the five months, the difference between the two years is approximately 4% (2023 lower than 2019).</p> <p>In 2019, National Highways was constructing a Smart Motorways scheme on the M20 between junction 3 and junction 5. This would have led to delays on the M20 which would have resulted in some longer distance travellers rerouting onto the A2/M2 corridor from the M20, leading to increased flows on the A2/M2 and reduced flows on the M20 in 2019. The analysis presented above therefore needs to be viewed in that context.</p> <p><b>M20 eastbound between junction 2 and the M26</b></p> <p>Figure 11 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday flow in PCUs at this location.</p>

Document title	Interested Party (IP)	Link to IP’s submission / Applicant’s response																					
		<p><b>Figure 11 M20 eastbound between junction 2 and the M26, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p>  <table border="1" data-bbox="660 901 1556 959"> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>21,810</td> <td>20,446</td> <td>-</td> <td>20,049</td> <td>20,495</td> <td>20,700</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>22,283</td> <td>22,502</td> <td>22,823</td> <td>-</td> <td>-</td> <td>22,536</td> </tr> </tbody> </table> <p>Data was not available from May 2019 or June to July in 2023. This analysis shows that flows in 2023 at this location are higher than the flows in 2019. The largest monthly difference is in April where the 2023 flows are 10% higher than in 2019. Looking at the average across the five months (ignoring months where data is missing), the difference between the two years is approximately 9%, with 2023 being higher than 2019.</p> <p>In 2019, National Highways was constructing a Smart Motorways scheme on the M20 between junction 3 and junction 5. This would have led to delays on the M20 which would have resulted in some longer distance travellers rerouting onto the A2/M2 corridor from the M20, leading to increased flows on the A2/M2 and reduced flows on the M20 in 2019. The analysis presented above therefore needs to be viewed in that context.</p>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	21,810	20,446	-	20,049	20,495	20,700	2023 All Vehicles (PCU)	22,283	22,502	22,823	-	-	22,536
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Document title	Interested Party (IP)	Link to IP's submission / Applicant's response																					
		<p><b>M20 westbound between the M26 and junction 2</b></p> <p>Figure 12 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday flow in PCUs at this location.</p> <p><b>Figure 12 M20 westbound between the M26 and junction 2, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p>  <table border="1" data-bbox="645 464 1906 1294"> <caption>M20 WB between M26 and J2 All Vehicle Flow (PCU) (06:00-18:00)</caption> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>21,676</td> <td>21,795</td> <td>21,614</td> <td>21,077</td> <td>21,834</td> <td>21,599</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>23,211</td> <td>23,535</td> <td>23,216</td> <td>23,453</td> <td>23,642</td> <td>23,412</td> </tr> </tbody> </table>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	21,676	21,795	21,614	21,077	21,834	21,599	2023 All Vehicles (PCU)	23,211	23,535	23,216	23,453	23,642	23,412
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Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>This analysis shows that flows in 2023 at this location are higher than the flows in 2019. The largest monthly difference is in June where the 2023 flows are 11% higher than in 2019. Looking at the average across the five months, the difference between the two years is approximately 8%, with 2023 higher than 2019.</p> <p>In 2019, National Highways was constructing a Smart Motorways scheme on the M20 between junction 3 and junction 5. This would have led to delays on the M20 which would have resulted in some longer distance travellers rerouting onto the A2/M2 corridor from the M20, leading to increased flows on the A2/M2 and reduced flows on the M20 in 2019. The analysis presented above therefore needs to be viewed in that context. If the traffic flows across the A2 and M20 corridors are combined, the resulting comparison is very close. The differences between eastbound and eastbound flows between 2019 and 2023 is approximately 1%, with 2023 being lower than 2019.</p> <p><b>A13 westbound within A1012 junction</b></p> <p>Figure 13 shows a month-by-month comparison between 2019 and 2023 of 12-hour weekday flow in PCUs at this location. There are currently no active TRIS sites on the A13 in an eastbound direction.</p>

Document title	Interested Party (IP)	Link to IP’s submission / Applicant’s response																					
		<p><b>Figure 13 A13 westbound within A1012 junction, 12-hour weekday vehicle flows (PCU) by month (2019 and 2023)</b></p>  <table border="1" data-bbox="667 1056 1818 1129"> <thead> <tr> <th></th> <th>March</th> <th>April</th> <th>May</th> <th>June</th> <th>July</th> <th>March-July Average</th> </tr> </thead> <tbody> <tr> <td>2019 All Vehicles (PCU)</td> <td>33,484</td> <td>33,916</td> <td>33,176</td> <td>33,070</td> <td>32,881</td> <td>33,305</td> </tr> <tr> <td>2023 All Vehicles (PCU)</td> <td>33,466</td> <td>34,605</td> <td>35,436</td> <td>33,992</td> <td>34,667</td> <td>34,433</td> </tr> </tbody> </table> <p>This analysis shows that flows in 2023 at this location are higher than the flows in 2019. The largest monthly difference is in May where the 2023 flows are 7% higher than in 2019. Looking at the average across the five months, the difference between the two years is approximately 3%, with 2023 higher than 2019.</p>		March	April	May	June	July	March-July Average	2019 All Vehicles (PCU)	33,484	33,916	33,176	33,070	32,881	33,305	2023 All Vehicles (PCU)	33,466	34,605	35,436	33,992	34,667	34,433
	March	April	May	June	July	March-July Average																	
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		<p><b>Conclusions</b></p> <p>The Select Link Analysis using TomTom data presented shows a very close match of distribution patterns using the Dartford Crossing between 2019 and 2023. This indicates that the patterns of movement using the crossing have not been significantly impacted by the COVID-19 pandemic.</p> <p>The TRIS traffic flow analysis shows a mixed picture where in some locations traffic flows were lower in 2023 than in 2019 and in other locations vice versa.</p> <p>There were some local factors that would impact this analysis. One example of this is the roadworks that were in place in 2019 on the M20. This likely led to rerouting between the M20 and the A2/M2 corridors in 2019. The impact of this is shown in the above analysis where on the A2 traffic flows are substantially lower in 2023 and substantially higher on the M20 in 2023.</p> <p>There are also some more high-level factors that need to be taken into account. For example, fuel prices in early 2023 were high which would be expected to lead to a reduction in car use, in particular for personal travel. The wider pressures on the cost of living in 2023 would also be expected to result in fewer car trips. The Applicant considers that both of these issues are likely to be short-term impacts, as fuel prices have already substantially reduced from their early 2023 peak point, and the pressures on the cost of living, primarily being driven by high levels of inflation, have also substantially reduced from early 2023.</p> <p>The changes in traffic flows presented therefore need to be taken in context of the local and global factors that would be expected to impact traffic flows in these locations between 2019 and 2023.</p>
<p>Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5)</p>	<p>Thurrock Council</p>	<p><b>Link to IP's submission:</b> Response to comments on walkers, cyclists and horse-riders made by Thurrock <a href="#">[REP6-164]</a></p> <p><b>Applicant's response:</b> Thurrock Council has presented additional mitigation in relation to walking, cycling, horse riding and areas of open and green space, with the request that measures are included within the Stakeholder Actions and Commitments Register <a href="#">[REP6-050]</a>. The mitigation proposed centres on providing additional resources for the Council to address the need for engagement during the construction period, specifically in relation to disruption to the active travel network and to encourage continued access to green and open spaces, thereby embedding healthy behaviours.</p> <p>The Applicant has reviewed the measures set out in Appendix C of Thurrock Council's Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5) <a href="#">[REP6-168]</a>. The measures comprise funding of a borough-wide engagement team for green and open spaces, and for walking and cycling, to be located</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>within the Place Directorate of the Council and for which a costed proposal has been provided. The supporting evidence highlighted in the Council's submission cites health benefits associated with access to greenspace, identifies factors affecting the obesogenic environment and emphasises the potential exacerbation of health inequalities. These are all areas set out within the corresponding evidence base of the Health and Equalities Impact Assessment <a href="#">[REP3-118]</a> in relation to assessment topics 'access to green space and outdoor recreation' and 'active travel'.</p> <p>The Applicant does not consider that a <b>borough-wide approach</b> to engagement for green and open spaces, walking and cycling presents a proportionate response to impacts described in Environmental Statement (ES) Chapter 13: Population and Human Health <a href="#">[APP-151]</a> and the Health and Equalities Impact Assessment <a href="#">[REP3-118]</a>. Impacts experienced by residents of Thurrock during the construction period are likely to be much more localised, relating to specific communities and users of areas of open space/walking and cycling routes along the proposed route of the Project. Indeed, paragraph C.5.16 of Thurrock's submission <a href="#">[REP6-168]</a> suggests that the measures proposed are '<i>to mitigate the non-significant negative affect during construction</i>' and to '<i>increase the likelihood of the positive impacts identified for operation</i>'.</p> <p>Existing measures proposed to alleviate some of the impacts associated with open space, walking and cycling include the Applicant's commitment to the creation of two Community Funds – one each covering affected communities to the north and south of the River Thames, secured via Section 106 agreement. Grants would be available for eligible community-led initiatives across four key themes identified based on the impacts/opportunities arising from the development, one of which is connecting communities and may include projects that enhance or encourage active travel. Eligible wards include those in close proximity to construction activities and funding would be available annually across the six years of construction and one year post-construction.</p> <p>Notwithstanding the inclusion of measures, such as the Community Fund, within the Applicant's submission already, the Applicant would like to discuss a more <b>targeted approach to engagement</b>, focusing on wards and communities of high sensitivity where these coincide with the route, and therefore where residents may experience the greatest levels of disruption as a result of the construction of the Project. Specific activities and locations will form the basis of ongoing discussions with Thurrock Council, and the Applicant will include proposals for specific measures where appropriate as part of a revised version of the Stakeholder Actions and Commitments Register, scheduled for Deadline 8.</p>
Comments on	Thurrock Council	<p><b>Link to IP's submission:</b> Comments on the Terms of Reference for the Community Liaison Group <a href="#">[REP6-164]</a></p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5)		<p><b>Applicant's response:</b></p> <p>The Applicant agrees with Thurrock Council that it would be beneficial to set out proposed Terms of Reference (ToR) for the Community Liaison Groups (CLGs) provided that these are proportionate and enable the retention of appropriate flexibility for Contractors. This would be consistent with the incorporation of ToR for the Workforce Accommodation Working Group, the Traffic Management Forum and the Travel Plan Liaison Group at Deadline 5 [<a href="#">REP5-054</a> and <a href="#">REP5-056</a>].</p> <p>The Applicant has noted the proposed ToR submitted by Thurrock Council in Appendix D of their Deadline 6 submission [<a href="#">REP6-168</a>] and will review and discuss these further through ongoing engagement and would intend to incorporate into the Code of Construction Practice at Deadline 8.</p>
Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5)	Thurrock Council	<p><b>Link to IP's submission:</b></p> <p>Section 2.6 in [<a href="#">REP6-164</a>]</p> <p><b>Applicant's response:</b></p> <p>The Applicant is currently reviewing the proposed modifications to the Design Principles as proposed by Thurrock Council (published 3 November 2023), and will respond to the specific requests for amendments to the Design Principles at Deadline 8.</p>
Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5)	Thurrock Council	<p><b>Link to IP's submission:</b></p> <p>Responding to comments on the Traffic Management Plan in section 2.2.5 of [<a href="#">REP6-164</a>]</p> <p><b>Applicant's response:</b></p> <p>Thurrock Council's response has requested the addition of three bullet points to the actions that the Traffic Management Plan (TMP) would address as a minimum in respect of specific stakeholders (public transport; healthcare facilities, local surgeries and hospitals; and local schools). TMP actions are currently set out for individual stakeholder groups within Table 2.3 of the outline Traffic Management Plan for Construction (oTMPfC) [<a href="#">REP6-048</a>].</p> <p>The Applicant has held initial discussions with Thurrock Council regarding the suggested additions to Table 2.3 and is preparing amendments to share with Thurrock Council to work towards an agreed position. The Applicant's final position on this matter will be reflected in the oTMPfC by Deadline 8.</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5)	Thurrock Council	<p><b>Link to IP's submission:</b> <a href="#">[REP6-164]</a></p> <p><b>Applicant's response:</b> The design of the replacement open space for Ron Evans Memorial Field has been developed in close consultation with Thurrock Council and has benefited from comments from stakeholders and the public submitted in response to multiple consultations on the Project.</p> <p>Paragraph 49 of Thurrock Council's Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5) <a href="#">[REP6-164]</a> suggests the inclusion of '<i>land which is located between the existing [Ron Evans Memorial Field] REMF and the higher density residential units to the west...</i>' as replacement open space '<i>which could have fulfilled the function of replacement [Public Open Space] POS, contemporaneous with the [compulsory acquisition] CA of part of REMF</i>'. This is contrary to feedback received from Thurrock Council to date.</p> <p>The replacement open space design for Ron Evans Memorial Field was in fact amended in 2021 to remove the agricultural field between the existing open space and housing on the edge of Grays at Thurrock Council's request. The Council asked that the land not be designated as replacement open space because it had development potential, providing the Grays Northern Villages Development Framework (November 2016) to the Applicant in support of this on 17 December 2020. The amended design, which excluded the land in question, was re-presented to Thurrock Council at a meeting on 13 May 2021 at which the Council confirmed that '<i>the amended proposal looks good and you have delivered what we asked for</i>'. The replacement open space design was subsequently consulted upon as part of the Community Impacts Consultation between July and September 2021 – refer to page 96 of the Operations Update (July 2021)<sup>8</sup>, Sheets 26 and 30 of the Land Use Plans (July 2021)<sup>9</sup> and Sheets 26 and 30 of the General Arrangement Plans (July 2021)<sup>10</sup>. Thurrock Council's response to the Community Impacts Consultation<sup>11</sup> notably confirms, at 'Table 2.1: The Council's Comments on the Operations Update' of Appendix H under sub-heading 'Chapter 3.2: Special Category Land'</p>

<sup>8</sup> Highways England (2021a). Lower Thames Crossing, Operations update – Community Impacts Consultation. Accessed November 2023.

[https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting\\_documents/Operations%20update.pdf](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Operations%20update.pdf).

<sup>9</sup> Highways England (2021b). Lower Thames Crossing, Map Book 2: Land Use Plans – Community Impacts Consultation. Accessed November 2023.

[https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting\\_documents/Map%20book%202%20Land%20use%20plans.pdf](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Map%20book%202%20Land%20use%20plans.pdf).

<sup>10</sup> Highways England (2021c). Lower Thames Crossing, Map Book 1: General Arrangements – Community Impacts Consultation. Accessed November 2023.

[https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Map%20book%201%20General%20Arrangements.pdf)

[2021/supporting\\_documents/Map%20book%201%20General%20Arrangements.pdf](https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Map%20book%201%20General%20Arrangements.pdf).

<sup>11</sup> Stantec (2021). Lower Thames Crossing – Summary Review of Community Impacts Consultation.

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>at the row titled 'Ron Evans Memorial Field (pg.92)' that '<i>The proposed changes have been discussed and agreed in principle with the Council</i>'.</p> <p>More information on the timing of replacement land generally and for Ron Evans Memorial Field specifically can be found at pages 74 and 75 of Comments on LIRs Appendix H: Thurrock Council (Part 4 of 5) <a href="#">[REP2-065]</a>, paragraph 3.1.12 of the Applicant's Post-event submissions, including written submission of oral headings, for CAH2 <a href="#">[REP4-178]</a> and Planning Statement Appendix D: Open Space Addendum <a href="#">[REP6-097]</a>. The Applicant welcomes confirmation from Thurrock Council at paragraph 9.4.11 of their Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5) <a href="#">[REP6-164]</a> that the new commitment (SACR-014) in the Stakeholder Actions and Commitments Register <a href="#">[REP6-050]</a> to make some replacement open space for Ron Evans Memorial Field accessible to the public earlier than anticipated '<i>partially mitigate[s] the loss of [public open space]</i>' during the construction period.</p> <p>The Applicant has considered Thurrock Council's comments on the wording of article 61 of the draft Development Consent Order <a href="#">[REP6-010]</a>. As a result, the Applicant is proposing to amend the wording of article 61 of the draft Development Consent Order for Deadline 7 <b>[Document Reference 3.1 (9)]</b> to replace reference to '<i>take all reasonable steps to deliver</i>' with '<i>implement</i>'. This provides additional assurance to stakeholders such as Thurrock Council that measures in the Stakeholder Actions and Commitments Register <a href="#">[REP6-050]</a> will be delivered.</p> <p>The Applicant has already detailed its approach to the design of replacement open space in Planning Statement Appendix D: Open Space <a href="#">[REP3-108]</a> and the Planning Statement Appendix D: Open Space Addendum <a href="#">[REP6-097]</a>. The assessment of replacement land relied upon by the Applicant is presented in Planning Statement Appendix D: Open Space <a href="#">[REP3-108]</a>. Section D.4 of that document explains that '<i>Where replacement land is to be provided, the five factors noted in paragraph 5.181 of the NPSNN (DfT, 2014) (i.e. size, usefulness, attractiveness, quality and accessibility) form the primary consideration for assessing whether the replacement land [complies with] the test contained in paragraph 5.166 of the NPSNN. The same factors are used to assess whether the replacement land is no less advantageous for the purpose of the test contained in the sections 131 and 132 of the Planning Act 2008</i>'. The Applicant's assessment of replacement land is therefore based on the factors set out in national policy.</p> <p>The assessment has been undertaken by a multi-disciplinary team consisting of specialists from legal, town planning, design and environmental backgrounds. Environmental Statement Appendix 1.1: Competent Expert Evidence <a href="#">[APP-332]</a> already details the relevant experience of the competent experts who produced the Environmental Statement for the Project. The Applicant intends to submit biographies of the expert witnesses who have made oral representations at hearings on behalf of the Applicant into the Examination at Deadline 8.</p>



Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>These specialists have, in combination, supported the development of the replacement open space design for Ron Evans Memorial Field in consultation with stakeholders, including Thurrock Council, and the public.</p> <p>The assessment does not conflate quality, quantity and the timing of replacement land, noting these are not the same headings listed under paragraph 5.181 of the National Policy Statement for National Networks (NPSNN)<sup>12</sup>. The assessment of replacement land for Ron Evans Memorial Field from paragraph D.5.53 onward of Planning Statement Appendix D: Open Space [REP3-108] references each of these considerations separately. This is explained at pages 74 and 75 of Comments on LIRs Appendix H: Thurrock Council (Part 4 of 5) [REP2-065] and at paragraph 3.1.12 of the Applicant's Post-event submissions, including written submission of oral headings, for CAH2 [REP4-178], which states '<i>The Applicant is aware that there is to be a time delay between the impact on the special category land and the replacement becoming available and this temporal aspect is a factor in considering whether the land is no less advantageous, and has been taken into account, both through the provision of a larger area provided than that which is affected, and in terms of the quality of the provision</i>'.</p>
<p>Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5)</p>	<p>Thurrock Council</p>	<p><b>Link to IP's submission:</b> [REP6-164]</p> <p><b>Applicant's response:</b> The Applicant notes Thurrock Council's request for additional non-statutory relief schemes but does not agree that any are required. The Applicant considers that the statutory schemes it has available (as detailed below) are sufficient.</p> <p><b>National Highways Discretionary Purchase Scheme – Highways Act 1980 Sections 246 and 248</b></p> <ul style="list-style-type: none"> <li>• These statutory powers provide the Applicant with the powers to purchase property and small businesses that have a pressing need to sell but have been unable to do so due to the impact of one of its proposed road schemes. The scheme is detailed in the Applicant's public facing booklet 'Your property and discretionary purchase'<sup>13</sup>. This is a similar provision to the Tideway Exceptional Hardship Scheme, the Heathrow Interim Property Hardship Scheme, and the High Speed 2 (HS2) Need to Sell Scheme.</li> </ul>

<sup>12</sup> Department for Transport (2014). National Policy Statement for National Networks.

<sup>13</sup> National Highways (2022). Your property and discretionary purchase. Accessed November 2023. <https://nationalhighways.co.uk/media/0o3jzsqz/your-property-and-discretionary-purchase.pdf>.

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		<p><b>Noise Insulation Regulations and Temporary Rehousing Policy – Noise Insulation Regulations 1975 and Section 28 Land Compensation Act 1973</b></p> <ul style="list-style-type: none"> <li>• These schemes are detailed in the Applicant's public facing booklet 'Your property and compensation or mitigation for the effects of our road proposals'<sup>14</sup>. The provision is very similar to the HS2 noise insulation scheme, the HS2 temporary rehousing policy and the Tideway non-statutory noise insulation scheme.</li> </ul> <p><b>Part 1 Claims – Part 1 of the Land Compensation Act 1973</b></p> <ul style="list-style-type: none"> <li>• These statutory powers allow compensation to be paid to any residential, agricultural unit owners or small business premises owners for any reduction in value of the properties by the use of a new or altered road as detailed in the Applicant's booklet Your property and Part 1 compensation<sup>15</sup></li> </ul> <p><b>Section 10 Claims – Section 10 of the Compulsory Purchase Act 1965</b></p> <p>These statutory powers allow compensation to be paid to people with an interest in land, but where no land has been acquired, for providing support for businesses outside of the Order Limits is to rely on the provisions of Section 10 of the Compulsory Purchase Act 1965<sup>16</sup> which provides persons with an interest in land, but where no land is acquired, to a right to compensation for injurious affection to their interest caused by the execution of the works.</p> <p><b>Procedure required for approval of any Non-Statutory Policy</b></p>

<sup>14</sup> National Highways (2022). Your property and compensation or mitigation for the effects of our road proposals. Accessed November 2023. <https://nationalhighways.co.uk/media/doseci3z/your-property-and-compensation-or-mitigation-for-the-effects-of-our-road-proposals.pdf>.

<sup>15</sup> National Highways (2022). Your property and Part 1 compensation. Accessed November 2023. <https://nationalhighways.co.uk/media/famn34ik/your-property-and-part-i-compensation.pdf>.

<sup>16</sup> Legislation.gov.uk. S10 Compulsory Purchase Act 1965. Accessed November 2023. <https://www.legislation.gov.uk/ukpga/1965/56/section/10>

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		<p>Paragraph 5.29 of the Applicant's operating licence<sup>17</sup> requires: '<i>In exercising its role as a strategic highways company ... the Licence holder <b>must</b> comply with or have due regard to relevant Government policy, as advised by the Secretary of State</i>'.</p> <p>Any non-statutory policy would require a Special Payment application to be made to the Department for Transport and HM Treasury as detailed in Annex 4.13 of Managing Public Money<sup>18</sup> and would class as 'extra-statutory and extra-regulatory payments' (i.e. payments within the broad intention of the statute or regulation, respectively, but go beyond a strict interpretation of its terms).</p> <p>Paragraph A4.13.10 of Managing Public Money details what information would need to be provided in any Special Payment application, which should include the nature and circumstances of the case, the amount involved, the legal advice (where appropriate), the management procedures followed by an assessment of the value for money of the case, any non-financial aspects, and whether the case in question could have wider impact (i.e. set precedents for other highways schemes or other transport infrastructure schemes). Other public facing booklets that detail the other statutory compensation schemes are also available, as follows:</p> <ul style="list-style-type: none"> <li>• Your property and compulsory acquisition<sup>19</sup></li> <li>• Your property and blight<sup>20</sup></li> </ul>
<p>Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5)</p>	<p>Thurrock Council</p>	<p><b>Link to IP's submission:</b> Paragraph 13.3.1 in <a href="#">[REP6-164]</a></p> <p><b>Applicant's response:</b> In response to Thurrock Council's request within Paragraph 13.3.1 of <a href="#">[REP6-164]</a>, the Applicant has revised the legend within the Receptors and Model Verification Zones figure so that each verification zone has its own distinct colour. Clean and tracked changes versions of this figure are provided in Appendix A of this document.</p>

<sup>17</sup> Department for Transport (2015). Highways England: Licence. Accessed November 2023.

<https://assets.publishing.service.gov.uk/media/5a80c317ed915d74e33fc43c/strategic-highways-licence.pdf>.

<sup>18</sup> HM Treasury (2023). Managing Public Money. Accessed November 2023.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1174979/Managing\\_Public\\_Money\\_-\\_May\\_2023\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1174979/Managing_Public_Money_-_May_2023_.pdf).

<sup>19</sup> National Highways (2022). Your property and compulsory acquisition. Accessed November 2023. <https://nationalhighways.co.uk/media/hx4pscpr/your-property-and-compulsory-acquisition.pdf>.

<sup>20</sup> National Highways (2022). Your property and blight. Accessed November 2023. <https://nationalhighways.co.uk/media/rqqfdn4m/your-property-and-blight.pdf>.

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<p>Comments on Applicant's Submissions at Deadline 4 (D4) and Deadline 5 (D5)</p>	<p>Thurrock Council</p>	<p><b>Link to IP's submission:</b> Paragraphs 123-126 in <a href="#">[REP6-164]</a></p> <p><b>Applicant's response:</b> <u>Paragraphs 123 and 124</u> As noted in paragraph 1.3.3 of the Mitigation Route Map (MRM) <a href="#">[REP4-203]</a>, the MRM purposefully does not duplicate the detailed content of the commitments recorded in the various Development Consent Order (DCO) control documents. The MRM has been provided for information to help with the Examination and is not in itself a control document. Rather, as noted in paragraph 1.3.1 of the MRM, it gives an overview of the various controls that will be used to secure environmental mitigation commitments and states how each of these controls is legally secured. It then provides a specific audit trail to show how the commitments referred to and relied on in the Environmental Statement (ES) and related documents are secured.</p> <p><u>Paragraph 125</u> The Stakeholder Actions and Commitments Register <a href="#">[REP6-050]</a> provides a list of design, construction, and operational related commitments given to stakeholders that are secured within the DCO but which do not naturally sit within the Register of Environmental Actions and Commitments (REAC) <a href="#">[REP6-038]</a>. As such, it does not contain mitigation measures that are relied on in the ES. Such commitments are made within the REAC instead.</p> <p><u>Paragraph 126</u> For the reasons above, the Applicant is satisfied that the MRM, in its existing presentation, meets its intended purpose to help the Examining Authority and Interested Parties to understand how mitigation relied on in the ES and related documents is secured in the DCO.</p>
<p>Comments on Applicant's Submissions at Deadline 4 (D4) and</p>	<p>Thurrock Council</p>	<p><b>Link to IP's submission:</b> IP's response to ExQ1_Q4.1.6 Modelled Traffic Effects: Accuracy of the Lower Thames Area Model in <a href="#">[REP6-164]</a></p> <p><i>'11.2.33 According to DfT's TAG Unit M3.1 (May 2020) 'The validation of a highway assignment model should include comparisons of &lt;...&gt; assigned flows and counts on individual links and turning movements at junctions as a check on the quality of the assignment'. The applicant seems to agree with this requirement and presents</i></p>

Document title	Interested Party (IP)	Link to IP’s submission / Applicant’s response
Deadline 5 (D5)		<p><i>high-level summary statistics from the Base Year Model (N108R1) in their response. However, apart from a summary table no further information has been provided by the applicant for the Council to understand the locations at which the validation checks have been completed or to interrogate the level of validation achieved on individual junctions and turns. Therefore, the Council requests that additional information is provided, particularly considering that the model falls short of the DfT’s TAG validation criteria and guidelines.’</i></p> <p><b>Applicant’s response:</b></p> <p>The Applicant has supplied full details of the comparison of observed and modelled flows in Annex C: Flow Calibration Tables by Site and Annex D: Flow Validation Tables by site in Combined Modelling and Appraisal Report (ComMA) Appendix B: Transport Model Package Annexes <a href="#">[APP-521]</a>.</p> <p>The Applicant does not agree that the model falls short of the DfT’s TAG validation criteria. The results of the Lower Thames Area Model (LTAM) validation are presented in Chapter 5 of the ComMA <a href="#">[APP-518]</a>. LTAM achieves an excellent match between modelled and observed traffic flows and journey times. The variable demand model meets the realism tests set out in TAG Unit M2.1. The LTAM also meets the convergence statistics both for the highway assignment model and for the iterations between the variable demand model and the highway assignment model.</p>
Comments on Applicant’s Submissions at Deadline 4 and Deadline 5 - Appendices A - O	Thurrock Council	<p><b>Link to IP’s submission:</b></p> <p><a href="#">[REP6-168]</a></p> <p><b>Applicant’s response:</b></p> <p>Thurrock Council has presented additional mitigation in relation to walking, cycling, horse riding and areas of open and green space, with the request that measures are included within the Stakeholder Actions and Commitments Register <a href="#">[REP6-050]</a>. The mitigation proposed centres on providing additional resources for the Council to address the need for engagement during the construction period, specifically in relation to disruption to the active travel network and to encourage continued access to green and open spaces, thereby embedding healthy behaviours.</p> <p>The Applicant has reviewed the measures set out in Appendix C of Thurrock Council’s Comments on Applicant’s Submissions at Deadline 4 (D4) and Deadline 5 (D5) <a href="#">[REP6-168]</a>. The measures comprise funding of a borough-wide engagement team for green and open spaces, walking and cycling, to be placed within the Place Directorate of the Council and a costed proposal has been provided. The Applicant does not consider that a borough-wide approach to engagement for green and open spaces, walking and cycling is a proportionate response to the adverse impacts likely to be experienced by residents of Thurrock, which are</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>likely to be much more localised and nuanced, relating more directly to communities along the proposed route. Current mitigation measures relating to walking, cycling and horse riding routes for construction and operation are set out in Environmental Statement Chapter 13: Population and Human Health <a href="#">[APP-151]</a>. Mitigation measures relating to access to green space and outdoor recreation, and active travel are summarised in Tables 8.1 and 8.2 of the Health and Equalities Impact Assessment <a href="#">[REP3-118]</a>. However, the Applicant is willing to consider a more targeted approach to engagement, focusing on wards and communities of high sensitivity where these coincide with the route, and therefore where residents may experience the greatest levels of disruption as a result of the construction of the Project.</p> <p>The Applicant will continue discussions with Thurrock Council in relation to a more targeted approach to engagement, and the potential development of specific measures for incorporation into a revised version of the Stakeholder Actions and Commitments Register, scheduled for Deadline 8.</p>
<p>Comments on Applicant's Submissions at Deadline 4 and Deadline 5 - Appendices A - O</p>	<p>Thurrock Council</p>	<p><b>Link to IP's submission:</b> <a href="#">[REP6-168]</a></p> <p><b>Applicant's response:</b> The Applicant agrees with Thurrock Council that it would be beneficial to set out proposed Terms of Reference (ToR) for the Community Liaison Groups (CLGs) provided that these are proportionate and enable the retention of appropriate flexibility for Contractors. This would be consistent with the incorporation of ToR for the Workforce Accommodation Working Group, the Traffic Management Forum and the Travel Plan Liaison Group at Deadline 5 <a href="#">[REP5-054]</a> and <a href="#">[REP5-056]</a>.</p> <p>The Applicant has noted the proposed ToR submitted by Thurrock Council in Appendix D of their Deadline 6 submission <a href="#">[REP6-168]</a> and will review and discuss these further through ongoing engagement and would intend to incorporate into the Code of Construction Practice at Deadline 8.</p>
<p>Comments on Applicant's Submissions at Deadline 4 and Deadline 5 -</p>	<p>Thurrock Council</p>	<p><b>Link to IP's submission:</b> <a href="#">[REP6-168]</a></p> <p><b>Applicant's response:</b> Thurrock Council has raised two points in response to the Applicant's Technical Note on workforce accommodation effects and management.</p> <p><u>Thurrock Council's first point</u></p>



Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
Appendices A - O		<p><i>'Whilst it is appreciated that workers will have an allowance which will allow them to utilise the higher cost end of the private rental market/hotel market within Thurrock, the impact of an increase in demand in the higher cost end is likely to be a drip-down effect on the overall private rented market. The Council has experienced like impacts on its housing market from competition for PRS and temporary accommodation from London Boroughs, who have significantly higher local housing allowance rates and more funds with which to incentivise placements. This is very similar to the higher financial capacity of workers, which is likely to drag medium and lower cost provision into the higher cost end, and move the market even further away from the local housing allowance benefit rate than it already is. This means that homeless and other low-income households will be further priced out of the rental market and local provision for local people (which is already extremely difficult) will reduce further. Therefore, this will mean the need for out of Borough placements, which lead to loss of support for households.</i></p> <p><i>At present the average monthly rental cost for a one bedroom property in Thurrock is at £1,050pcm, and the LHA rate is at £698.10, which means that there is a 34% disparity already. With an influx (of up to 2.8% of the market) of new households in this section of the sector, this disparity can only increase, pricing out local people and the most vulnerable households.'</i></p> <p><b>Applicant's response:</b></p> <p>The Applicant is sympathetic to the pre-existing, structural issues being faced by Thurrock Council and all local authorities with a statutory housing duty, which are primarily driven by the economic environment and nation-wide disparities in affordability and public sector funding for housing support.</p> <p>The Applicant notes that the disparity between Local Housing Allowance (LHA) rates and rents is being experienced in all areas, and has included this within the assessment as part of the Workers Accommodation Report (WAR) <a href="#">[APP-551]</a> (at paragraphs 6.4.29 to 6.4.45).</p> <p>Statistics on homelessness relief/prevention duties for the financial year 2022/23<sup>21</sup> show that Thurrock accommodated 21 households from other local authorities when the local authority's statutory relief duty ended and a further 10 when the local authority's statutory prevention duty ended. Thurrock also placed 56 of their own resident households in other local authorities to discharge the statutory relief or prevention duty. It is noted that this data does not capture all permanent moves, but is important for the concern about short-term,</p>

<sup>21</sup> Department for Levelling Up, Housing and Communities (2023). Statutory homelessness in England: financial year 2022-23. Accessed November 2023. <https://www.gov.uk/government/statistics/statutory-homelessness-in-england-financial-year-2022-23/statutory-homelessness-in-england-financial-year-2022-23#:~:text=79%2C660%20single%20households%20were%20owed,%25%20increase%20from%202021%2D22>



Document title	Interested Party (IP)	Link to IP’s submission / Applicant’s response
		<p>temporary or emergency accommodation, which shows a relatively low level of trans–local authority movement.</p> <p>There is no evidence to suggest that this or the influx of workers would result in increased rents, and it should be noted that when placing <i>permanently</i> in another local authority, the household’s housing benefit is based on the LHA rate of the receiving authority, not the London Authority (in this instance) so that would not unduly affect rent levels.</p> <p>London Boroughs may be able to provide more top-up payments, but these are not rent top ups in perpetuity, more likely to be grants for deposit, so again not likely to affect rents.</p> <p>The Applicant’s position is that less than 3% of the rented market at the peak of construction would be sought by non-local workers working on the Project in Thurrock. This is a highly conservative estimate, as local recruitment is anticipated to be stronger than modelled, and only applies to the relatively short peak of construction activity. The Applicant has concluded that this is unlikely to lead to significant adverse effects on the housing market.</p> <p>The Applicant considers that the measures currently secured by the Framework Construction Travel Plan (FCTP) [<a href="#">REP5-054</a>] (which is secured by the draft Development Consent Order (dDCO) [<a href="#">REP6-010</a>]) provide commitments to best-practice monitoring, forward-look assessments, collaboration and intervention.</p> <p>The WAR [<a href="#">APP-551</a>] and the FCTP [<a href="#">REP5-054</a>] summarise how monitoring, governance and interventions will be developed and implemented collaboratively to avoid adverse effects. The proposals create an agile framework to cater for the uncertainty and to work closely with local authorities to respond quickly if issues arise (and, in fact, look ahead to potential issues and avoid them before they manifest). The approach aims to address impacts should they arise based on evidence provided by the Project’s monitoring (and look-ahead information) and local authority data. This enables solutions to be fit for purpose based on the specific issues that could occur.</p> <p>The Applicant believes that the proactive monitoring of worker accommodation need, including 12-month look ahead that has been proposed, will allow the Applicant to anticipate and manage impacts within the context of the housing market at that time. The Applicant’s precautionary measures outlined above and, in particular, the Workforce Accommodation Working Group (WAWG) provide a route for key parties to work together on reviewing the evidence and identifying appropriate action, which would in most cases be actioned by the Contractors in their management of the workforce rather than the need to ‘back-fill’ for adverse effects experienced by the council.</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p><u>Thurrock Council's second point</u></p> <p><i>'We welcome the requirement to provide evidence and detail of 'reasonable endeavours', however, we do not consider that this wording is committed enough, nor that it reflects a true assurance that the Council's suppliers will not be sued/negotiated with in a way which would mean less accommodation being available for vulnerable homeless and other households owed statutory duties by the Authority. We would welcome a commitment in a control document that states that they 'will neither utilise the resources of, nor negotiate contracts or leases with, any of the providers currently working with the Authority to provide temporary or emergency accommodation' (including the list below). The list of current providers, including some hotels used particularly during winter months, but also during other periods in the year, is as follows:</i></p> <p><i>[Redacted]</i></p> <p><b>Applicant's response:</b></p> <p>The Applicant considers that it would be disproportionate to fetter the market and stop workers taking accommodation in the proposed list, which includes three key low-cost hotel providers, who are not at capacity, and under current legislation cannot legally accommodate families in household need for more than six weeks.</p> <p>A blanket ban would limit the market unfairly and would disrupt agreements of Contractors who likely already have standing agreements with these providers.</p> <p>The Applicant has already proposed a provision, at paragraph 5.4.13(d) of the FCTP <a href="#">[REP5-054]</a>, that would ensure collaborative work between the Applicant, local authorities and Contractors with the aim to ensure that Contractors' use of visitor accommodation does not unduly interfere with the provision relied upon by the local authorities as follows:</p> <p><i>'The WAWG must be provided with details of the reasonable endeavours which the Contractors have used to ensure the use by non-local workers of visitor accommodation with the aim of reducing conflict with visitor accommodation used by Local Authorities as temporary accommodation.'</i></p>
Comments on	Thurrock Council	<p><b>Link to IP's submission:</b></p> <p><a href="#">[REP6-168]</a></p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
<p>Applicant's Submissions at Deadline 4 and Deadline 5 - Appendices A - O</p>		<p><b>Applicant's response:</b></p> <p>Thurrock Council state at paragraph M.2.4 of their submission that they had requested specific analysis to address key questions regarding the robustness of the economic and engineering appraisals, in consideration of developing Department for Transport (DfT) guidance.</p> <p>The Applicant completed the appraisal of the outputs of the Lower Thames Area Model (LTAM) following the Transport Analysis Guidance (TAG) in place at the time of the submission of its Development Consent Order (DCO) application in October 2022. The Applicant's transport modelling includes high and low growth scenarios (as set out in Section 8.6 of Combined Modelling and Appraisal Report (ComMA) Appendix C: Transport Forecasting Package [<a href="#">APP-522</a>]), in addition to the core scenario, to allow for a robust assessment of the impacts of the Project in accordance with paragraph 4.6 of the National Policy Statement for National Networks (NPSNN)<sup>22</sup>. The modelling undertaken by the Applicant is proportionate and includes appropriate sensitivity analysis to consider the impact of uncertainty on Project impacts.</p> <p>The Applicant does not consider it proportionate to update its modelling and appraisal work whenever there is a change in the DfT's guidance, where this change occurs after submission of its DCO application. This position is supported in national policy at paragraph 4.7 of the NPSNN, which notes that TAG is updated regularly but states that '<i>updated guidance is only expected to be used where it would be material to the investment decision...</i>', which it would not be in the Project's case. The transport modelling using NTEM 8 and the Common Analytical Scenarios was undertaken to demonstrate that the need for the Project and the relief provided by the Project at the Dartford Crossing, compared to the Do Minimum situation, remained with the revised traffic growth forecasts and in each of the Common Analytical Scenarios.</p> <p><i>'M.2.10 The Council would have preferred for the required analysis of uncertainty in accordance with TAG to have been provided by the applicant, with the full back-up of the modelling capability they refuse to allow others to use.'</i></p> <p><b>Applicant's response:</b></p> <p>Thurrock Council stated at paragraph M.2.10 of their submission that National Highways '<i>refuse to allow others to use</i>' the LTAM.</p> <p>The Applicant has previously advised that it is not National Highways' policy to release full scheme models while the scheme is going through its consent process. The Applicant's position on this has been set out as</p>

<sup>22</sup> Department for Transport (2014). National Policy Statement for National Networks.

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>item 2.1.145 within the Statement of Common Ground with Thurrock Council [<a href="#">REP6-030</a>]. The Applicant notes that the Council does have access to National Highways South East Regional Transport Model with which it could undertake such testing if it wished.</p> <p><i>'Table M3.1: Results of Sensitivity Tests on the Estimated Value for Money of LTC'</i></p> <p><b>Applicant's response:</b></p> <p>Thurrock Council provided in Table M3.1 of Appendix M of their submission their calculated sensitivity values for the Benefit Cost Ratio and the estimated value for money of the A122 Lower Thames Crossing.</p> <p>Within Table M3.1 some of the results have been prepared by the Applicant and some have been estimated by the Council. In the table the Council speculates that the forthcoming change in DfT guidance to add VAT onto carbon prices would lead to an approximate average -0.5 adjustment to the Benefit Cost Ratio (BCR) figures. This is a wildly inaccurate and unsubstantiated figure and the actual adjustment would have a considerably lower impact on the Project's BCR.</p> <p>This does however lead to a wider point. The Project's BCR was calculated according to TAG guidance at the time of submission. There will be a variety of future changes to the values used in calculating the BCR of a scheme. Some of these, such as adding VAT onto the price of carbon, would lower the BCR; others, such as a substantial increase in the value of time savings of freight vehicles, would increase the BCR for the Project. It is not appropriate in the Applicant's opinion for the Council to cherry pick individual changes from a number of likely forthcoming changes. Were the DCO to be granted, the DfT would require the Applicant to update the BCR using the TAG values and guidance that would be current at the time of the submission of the Full Business Case for the Project.</p> <p>The Applicant would also like to note that the Project includes twin bored tunnels for which the civil engineering work has a 120-year design life. The Applicant has undertaken a 100-year appraisal (as opposed to the standard 60-year period), in which the BCR for the Project is higher as the benefits are valued over 100 years rather than for 60. The value of time savings alone rise by £713m, from £2,088 million to £2,801 million, and the final BCR using Level 1 and Level 2 benefits rises from 1.22 to 1.66.</p> <p><i>'M.3.9 These findings still adopt the applicant's rather unrealistic assumption that the less well-established calculations of the benefits of reliability and wider economic impacts are unaffected by the amount of traffic growth.'</i></p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p><b>Applicant's response:</b></p> <p>In paragraph M.3.9 of Thurrock Council's submission, they state that '<i>These findings</i> [the calculated benefits for the high growth and low growth scenarios] <i>still adopt the applicant's rather unrealistic assumption that the less well-established calculations of the benefits of reliability and wider economic impacts are unaffected by the amount of traffic growth.</i>'</p> <p>In the appraisal of the Project recorded in Appendix D of the ComMA [<a href="#">APP-524</a>, <a href="#">APP-525</a>, <a href="#">APP-526</a> and <a href="#">APP-527</a>], the Applicant did calculate the wider economic impacts of the Project, using Wider Impacts Transport Appraisal (WITA) software which is published by DfT for this purpose, using the outputs of the LTAM for the core, low and high growth scenarios. Following the principles of proportionate appraisal, as is recommended by TAG, the accident and reliability benefits were not recalculated for the high and low growth scenarios as these take a long time to calculate and the variation in the values would only have a slight impact on the final BCR presented. Paragraph 9.2.19 of the ComMA Appendix D: Economic Appraisal Package: Economic Appraisal Report [<a href="#">APP-526</a>] sets out where the values from the core scenario appraisal were carried over into the appraisal of the high and low growth scenarios.</p> <p><i>'M.3.15 In the Council's view this cannot be used as an acceptable reason for not carrying out further tests on the robustness of the economic and technical appraisal of the scheme, which is an inherent part of the analysis of uncertainty and must be satisfactory before consent can be justified.'</i></p> <p><b>Applicant's response:</b></p> <p>Thurrock Council state in paragraphs M.3.14 and M.3.15 of their submission that the fact that a Full Business Case will be produced for the government following the latest DfT guidance '<i>cannot be used as an acceptable reason for not carrying out further tests on the robustness of the economic and technical appraisal of the scheme, which is an inherent part of the analysis of uncertainty and must be satisfactory before consent can be justified.</i>'</p> <p>As noted above, the NPSNN is clear stating at paragraph 4.7 '<i>updated guidance is only expected to be used where it would be material to the investment decision...</i>'.</p> <p>It is the Applicant's position that it is important not to conflate the investment decision, which is to be made by government, and the decision on the application for development consent, which is conducted in accordance with the Planning Act 2008.</p> <p>The investment decision made by the government is informed by a business case written in accordance with the Treasury's Green Book guidance. This business case has five dimensions, including the strategic</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p>dimension. Government funding decisions are based on the case in all five dimensions, including the strategic dimension which sets out the need for the proposed intervention. The Applicant considers it is for the government to decide what BCR level it considers is satisfactory, taking into account the evidence provided in all five dimensions of a business case. It is for the government to decide whether the Project has to pass a particular BCR threshold to be given funding. The Council does not state what BCR they consider to be satisfactory.</p> <p>The planning decision, to be made by the Secretary of State, is informed by an assessment against the NPSNN. At paragraph 4.5, the NPSNN states '<i>The economic case prepared for a transport business case will assess the economic, environmental and social impacts of a development. The information provided will be proportionate to the development. This information will be important for the Examining Authority and the Secretary of State's consideration of the adverse impacts and benefits of a proposed development.</i>' The economic case presented within ComMA Appendix D: Economic Appraisal Package: Economic Appraisal Report [<a href="#">APP-526</a>] within the application provides this information, and within the economic case the BCR provides one measure of the benefits provided by the Project. As with the investment decision, the BCR is simply one factor in the consideration, and the decision will be informed by consideration of the Need for the Project, the Planning Statement, the Environmental Statement, the Transport Assessment and other Application Documents. A proportionate assessment of the uncertainty in the BCR is provided in the Economic Appraisal Report.</p> <p><i>'M.4.3. Therefore, it is the absolute level of traffic at Dartford Crossing which counts for the relief of congestion, since that will determine whether there are better conditions for road users than they are currently experiencing, and the extent to which the management of traffic by engineering means will be technically feasible.'</i></p> <p><b>Applicant's response:</b></p> <p>The Applicant does not consider that comparison between future years and the base year (so a comparison between 2030/2045 and 2016) is appropriate as it ignores the growth in traffic that will occur, irrespective of the opening of the Project. In addition, it would not be possible to maintain traffic levels at the Dartford Crossing at any level over time, given the continued growth in traffic, without continual changes to the charge that is levied. Charging at the Dartford Crossing (and on the Project) is a matter for the DfT, but there are currently no proposals to either have variable charging or to have a different charge between the two crossings.</p>

Document title	Interested Party (IP)	Link to IP's submission / Applicant's response
		<p><i>'M.4.4. Table E4.1 re-presents the applicant's high traffic forecasts at Dartford to address this question, using the three years 2016, 2030 and 2045 (now delayed to 2032 and 2047), reported by the applicant. A more precise analysis would be possible if the Council had the forecasts for all intervening years.'</i></p> <p><b>Applicant's response:</b></p> <p>The Applicant has provided this information for 2030, 2037, 2045 and 2051 in Tables 8.11, 8.32, 8.53 and 8.74 respectively in the ComMA Appendix C: Transport Forecasting Package [<a href="#">APP-522</a>].</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>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.

Term	Abbreviation	Explanation
<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.
<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.

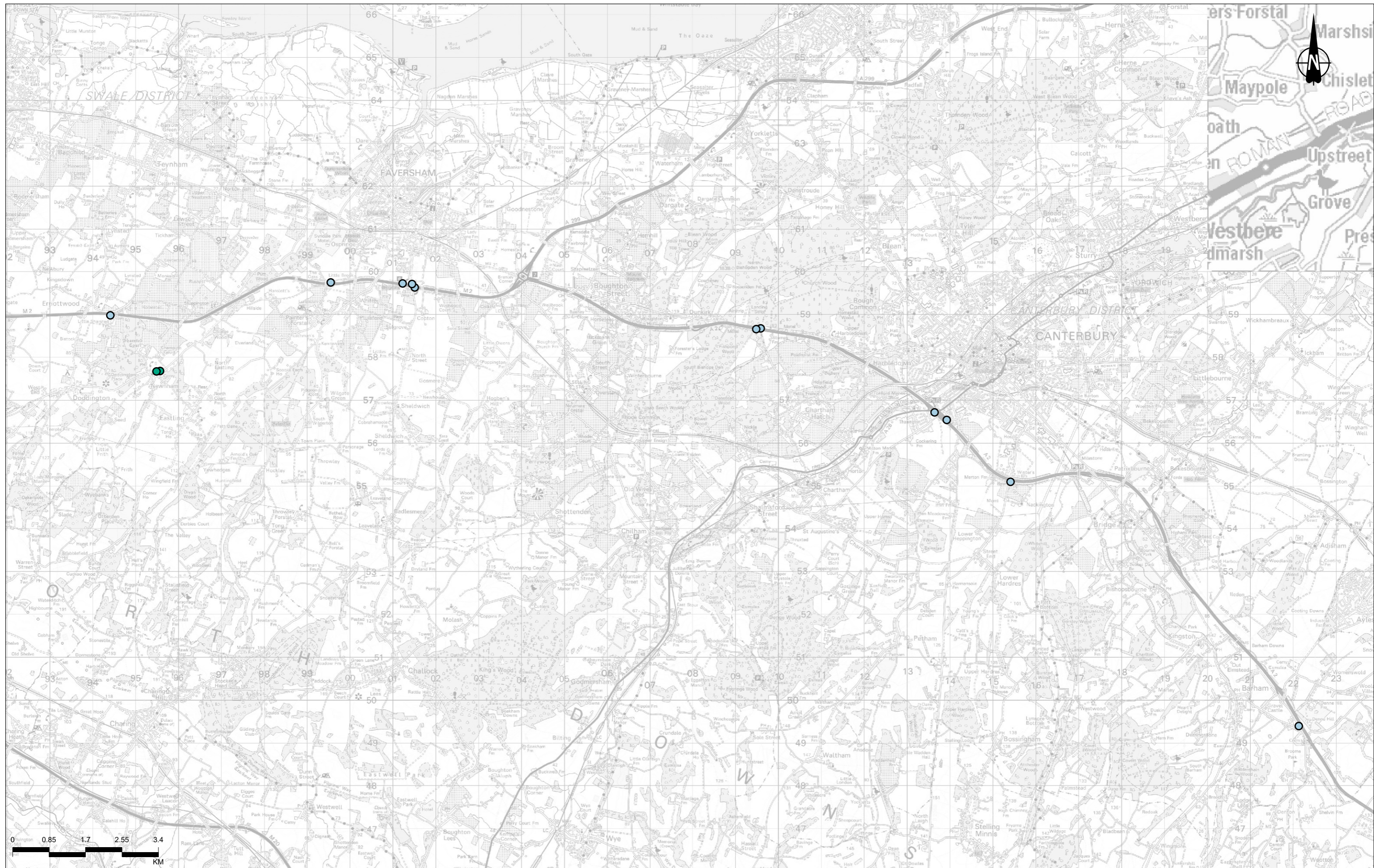
Term	Abbreviation	Explanation
<b>Order Limits</b>		The outermost extent of the Project, indicated on the Plans by a red line. This is the Limit of Land to be Acquired or Used (LLAU) by the Project. This is the area in which the DCO would apply.
<b>Planning Act 2008</b>		The primary legislation that establishes 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.

# Appendices

## Appendix A Receptors and Model Verification Zones

### A.1 Receptors and Model Verification Zones v2.0 (Clean version)



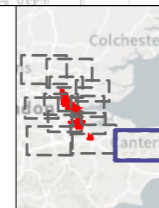


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**Legend**  
Air Quality Receptors - Verification Zone

- 1
- 14

P01	S9	22/09/2023	Deadline 5	SW	SP	FM
P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprd

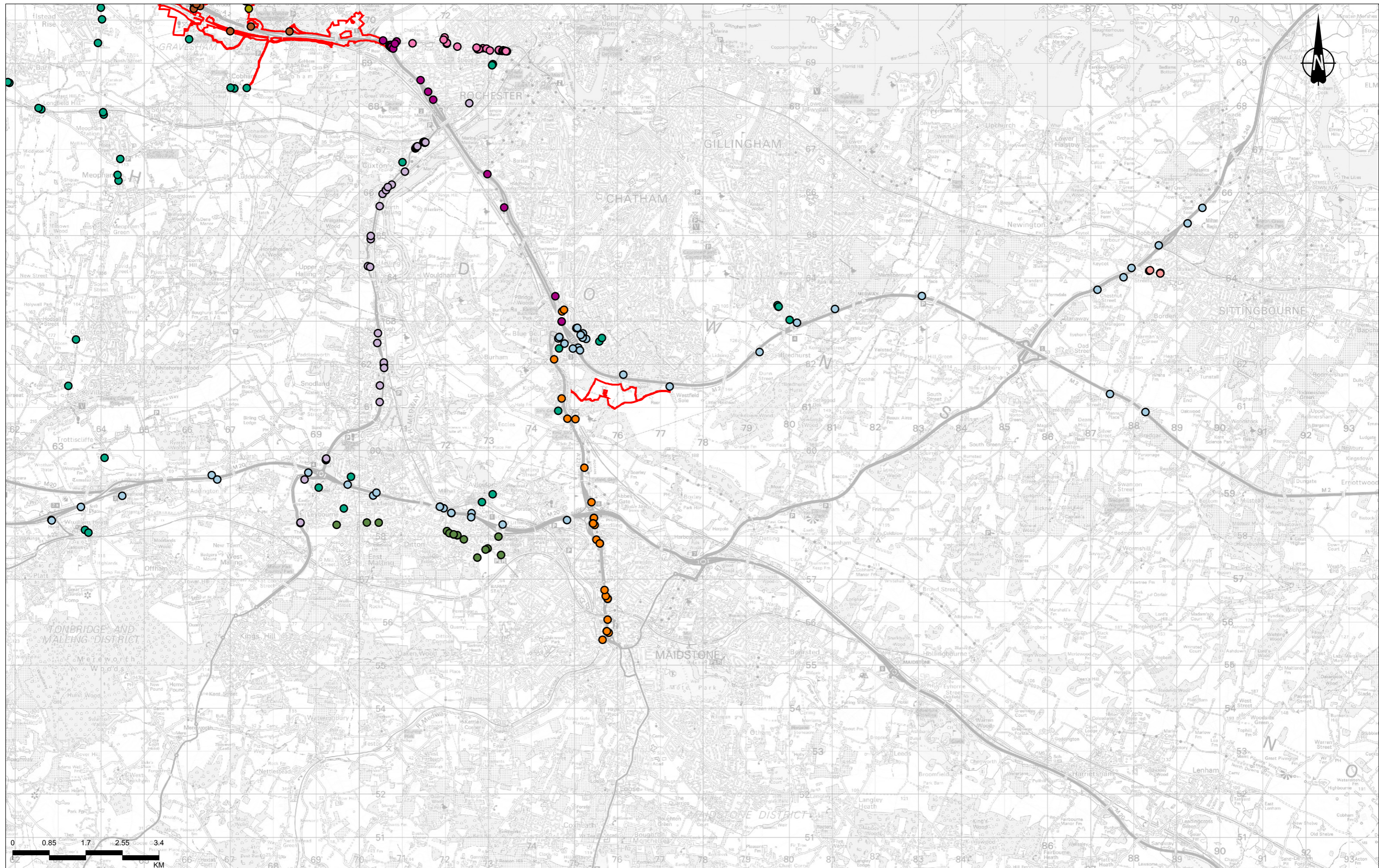


Client  
**national highways**

Project  
**LOWER THAMES CROSSING**

Status	PINS SUBMISSION	Original Size	A3	Revision	P02
Application Document Number	TR010032/EXAM/9.176	Scale	1:80,000		
Drawing Title	<b>Receptors and Model Verification Zones</b>				
	Page 1 of 12				
Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001				



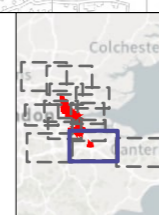


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Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprvd
P01	S9	22/09/2023	Deadline 5	SW	SP	FM
P02	S9	09/11/2023	Deadline 7	MW	SP	FM

**Legend**

- Order Limits
- Air Quality Receptors - Verification Zone
- 1
- 5
- 8
- 9
- 12
- 14
- 15
- 16
- 17
- 18

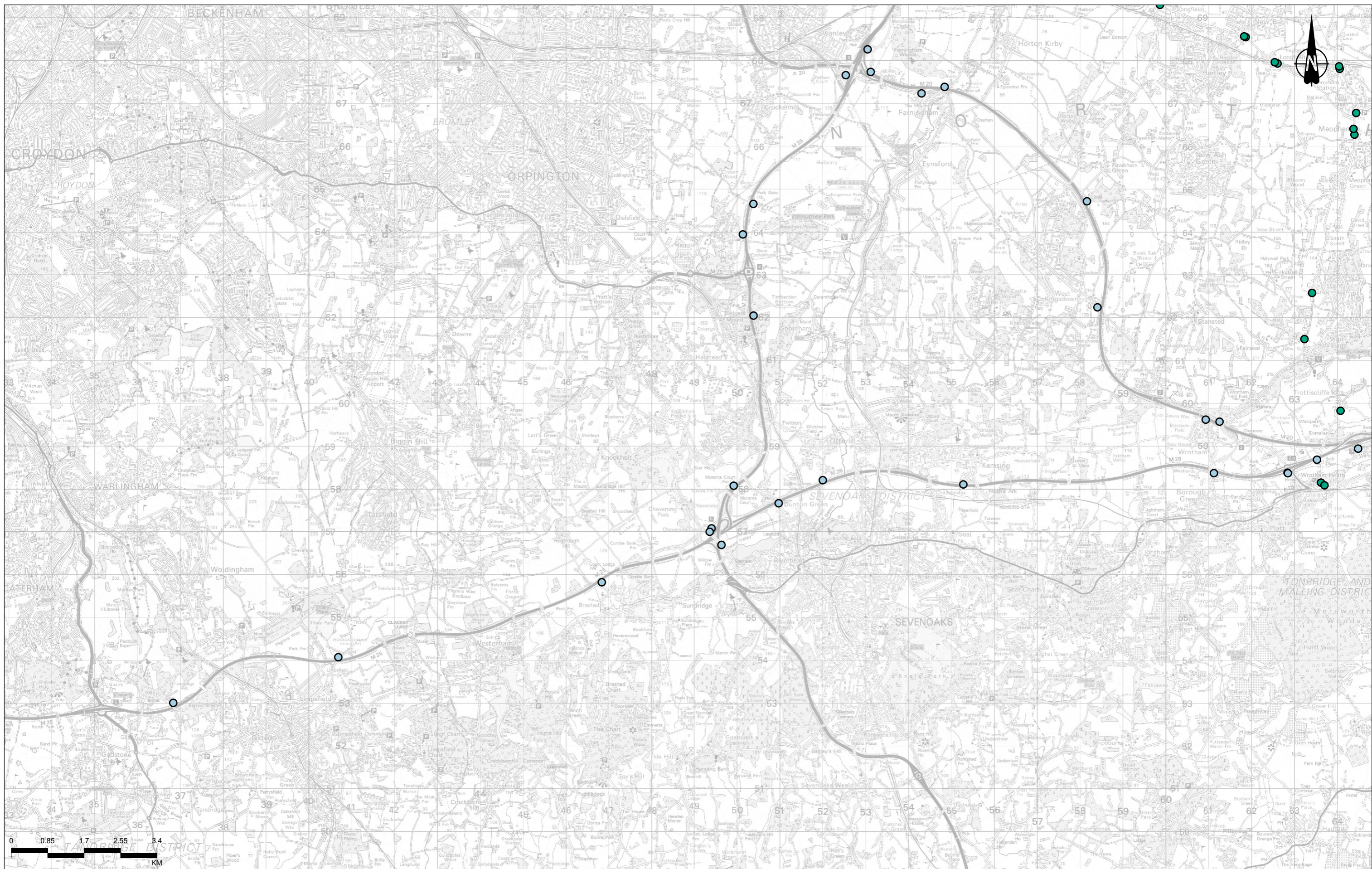


Client  
**national highways**

Project  
**LOWER THAMES CROSSING**

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Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001				





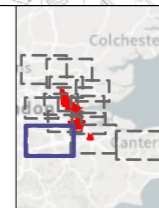
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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprvd

**Legend**

**Air Quality Receptors - Verification Zone**

- 1
- 14



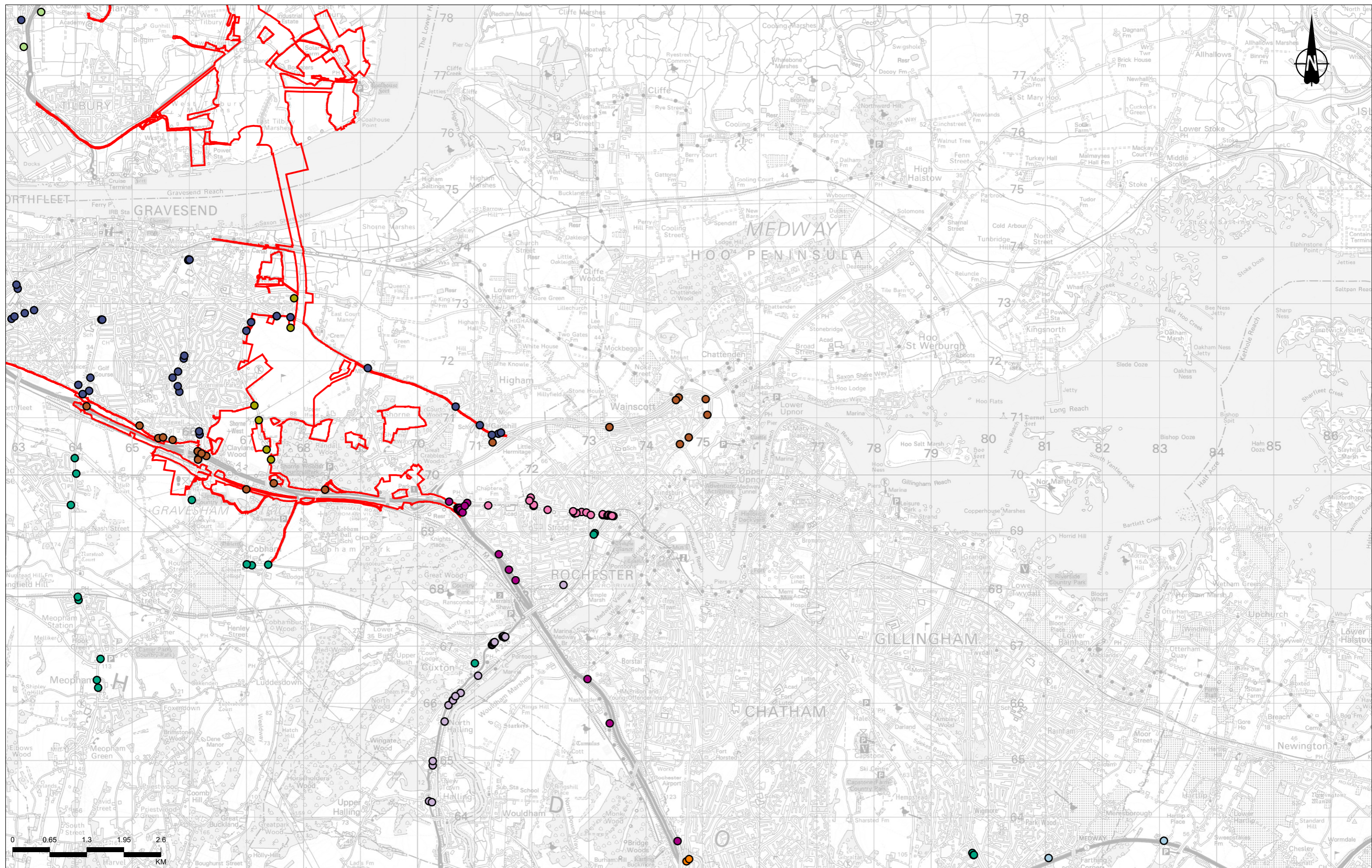
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Project

**LOWER THAMES CROSSING**

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Drawing Number	HE540039-CJV-EAQ-SZP_EGNE00000000-DR-LE-00001					





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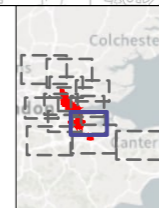
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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprv

**Legend**

Order Limits

**Air Quality Receptors - Verification Zone**

<span style="color: blue;">●</span> 1	<span style="color: orange;">●</span> 12
<span style="color: green;">●</span> 3	<span style="color: purple;">●</span> 14
<span style="color: yellow;">●</span> 8	<span style="color: pink;">●</span> 16
<span style="color: grey;">●</span> 9	<span style="color: lightblue;">●</span> 17
	<span style="color: lightgreen;">●</span> 18

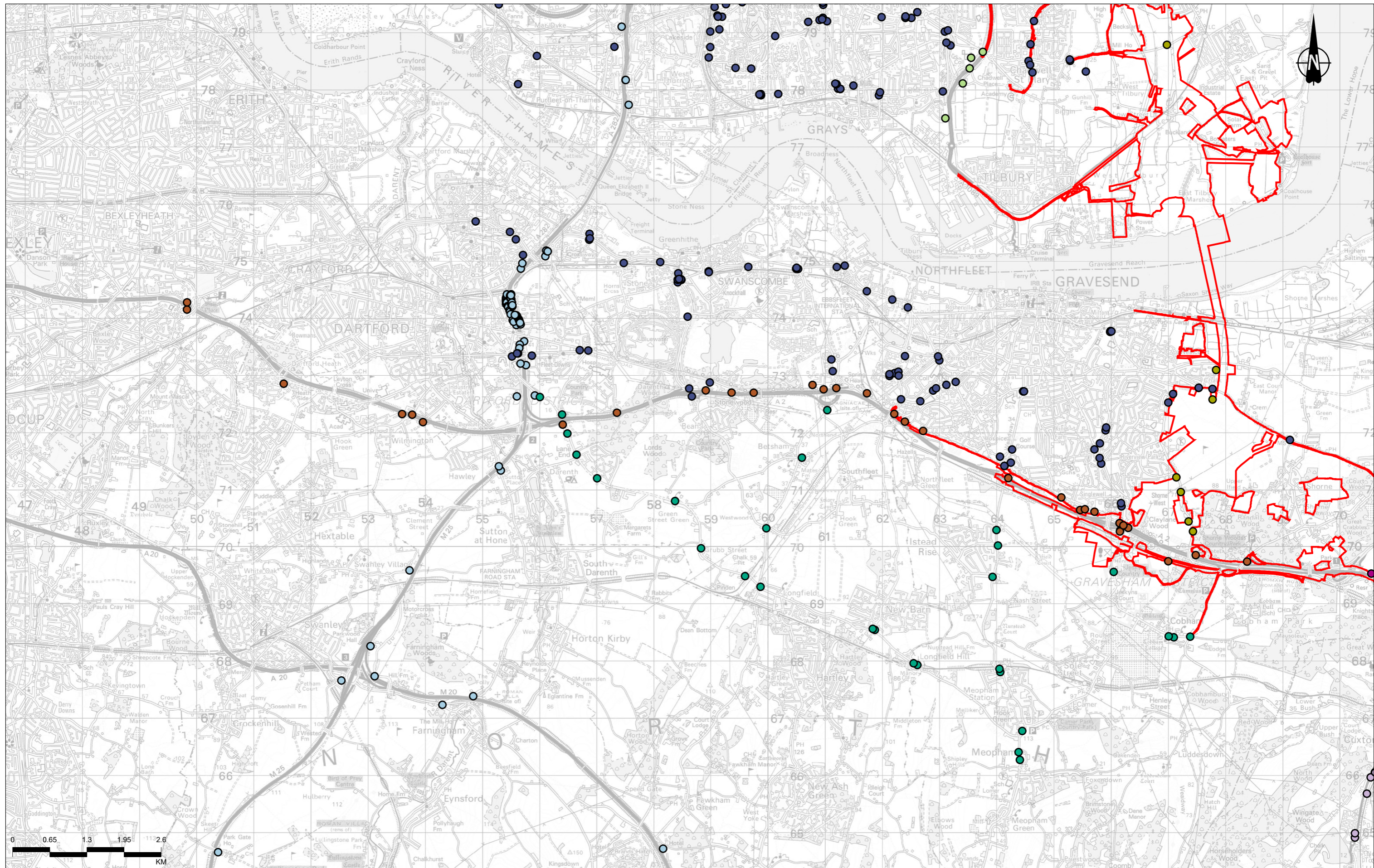


Client: **national highways**

Project: **LOWER THAMES CROSSING**

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Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001				



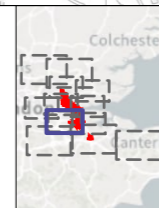


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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprv

**Legend**

	Order Limits		12
	Air Quality Receptors - Verification Zone		13
	1		14
	3		16
	9		18

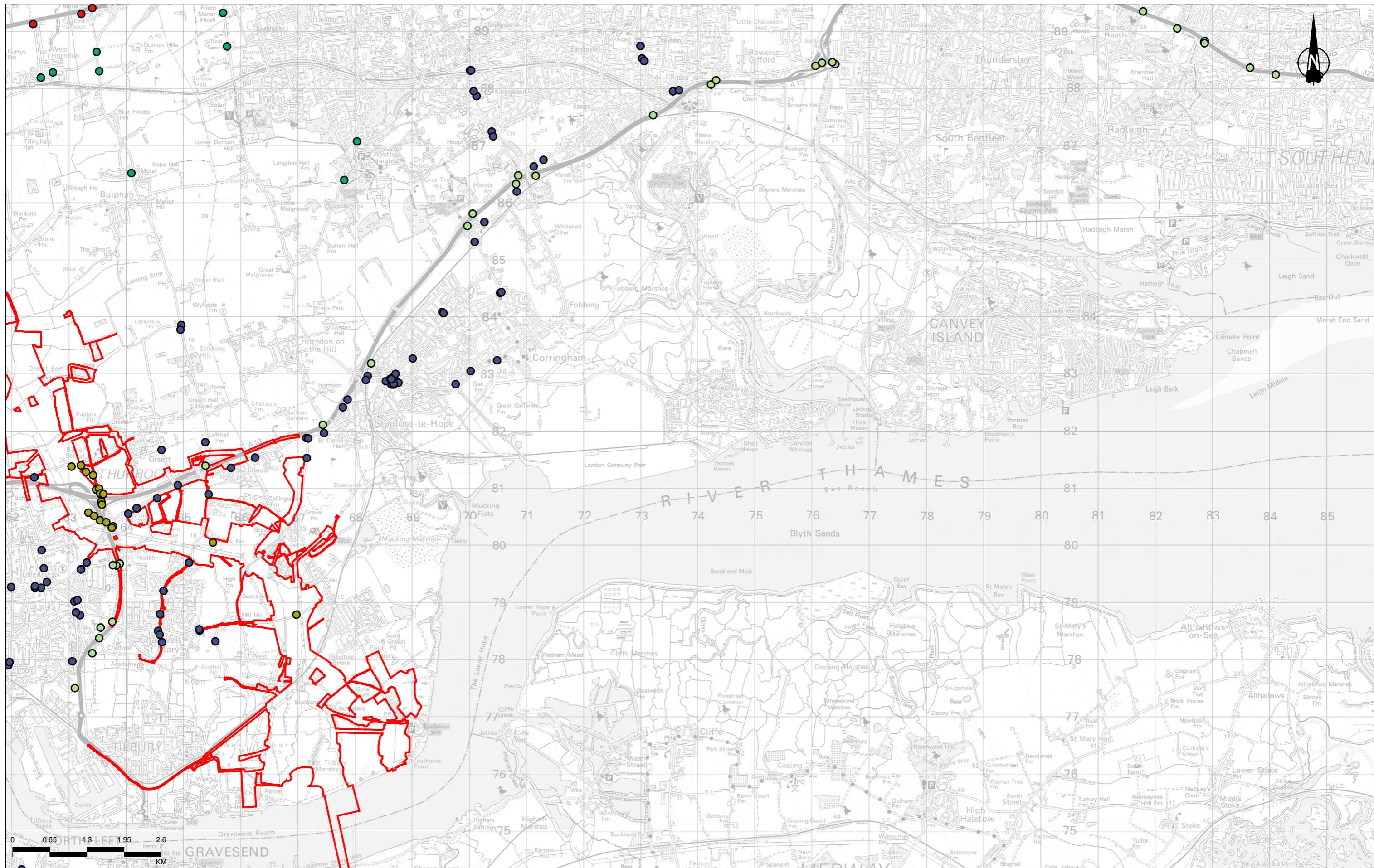


Client  
 national highways

Project  
**LOWER THAMES CROSSING**

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	Page 5 of 12				
Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001				



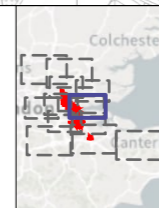


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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprvd

**Legend**

- Order Limits
- Air Quality Receptors - Verification Zone
- 3
- 6
- 13
- 14
- 18



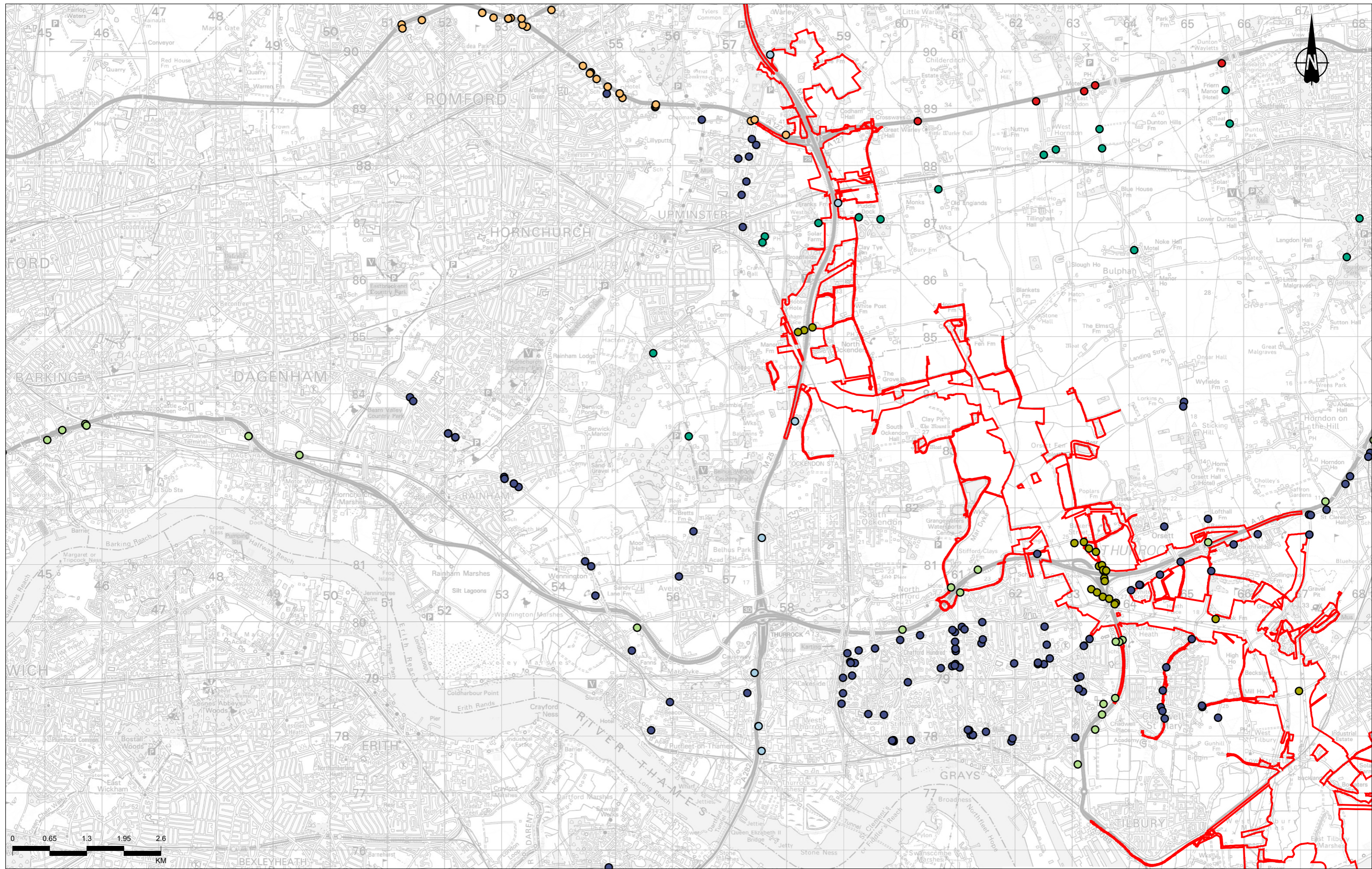
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Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001				

Page 6 of 12





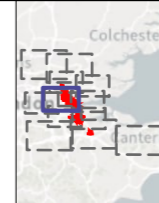
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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	App'd

**Legend**

	Order Limits		7
	Air Quality Receptors - Verification Zone		13
			14
			18
		1	
		3	

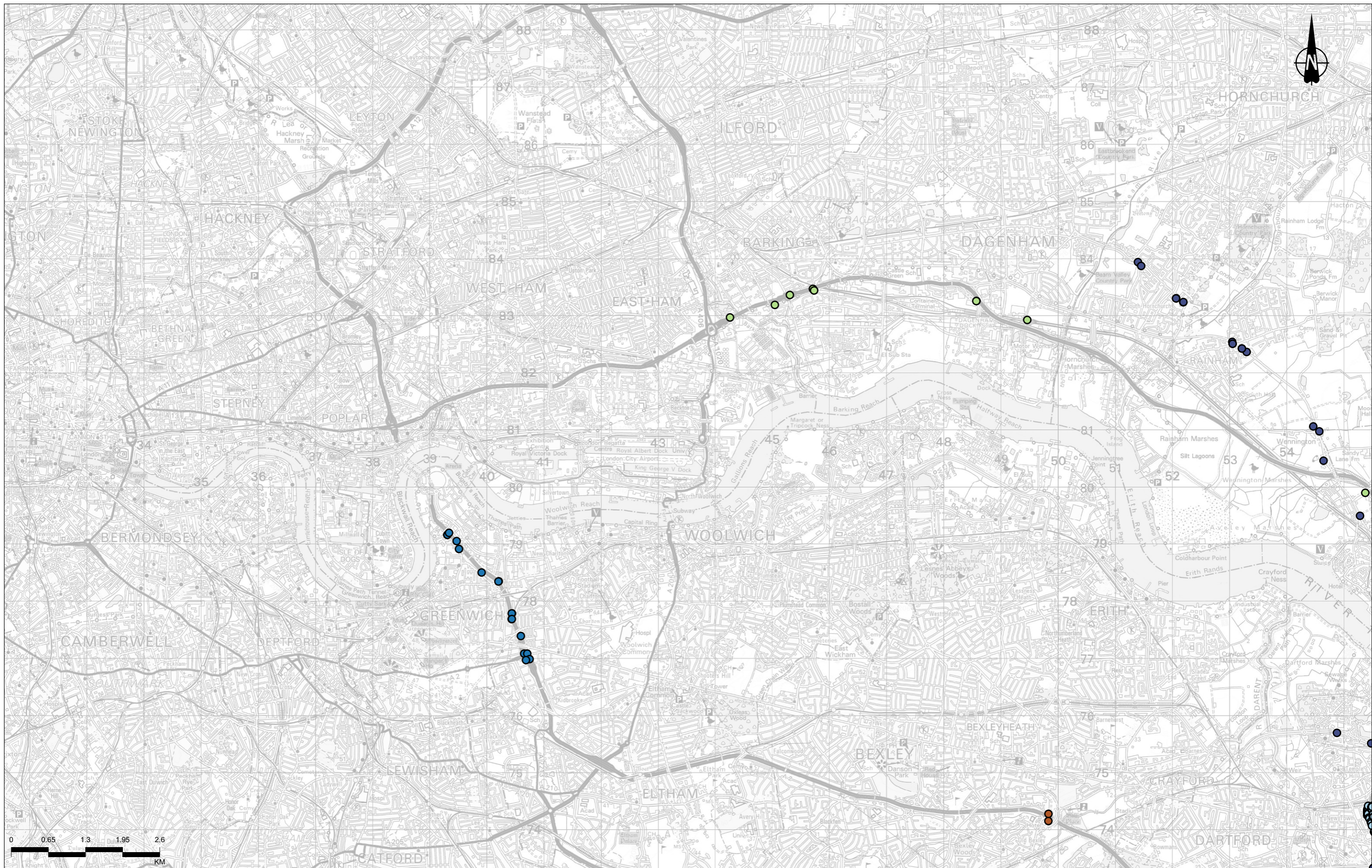
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Drawing Title		Receptors and Model Verification Zones		Page 7 of 12						
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LOWER THAMES CROSSING

Receptors and Model Verification Zones  
Page 7 of 12



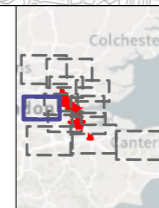


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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprv

**Legend**  
Air Quality Receptors - Verification Zone

● 1
● 2
● 3
● 12
● 13



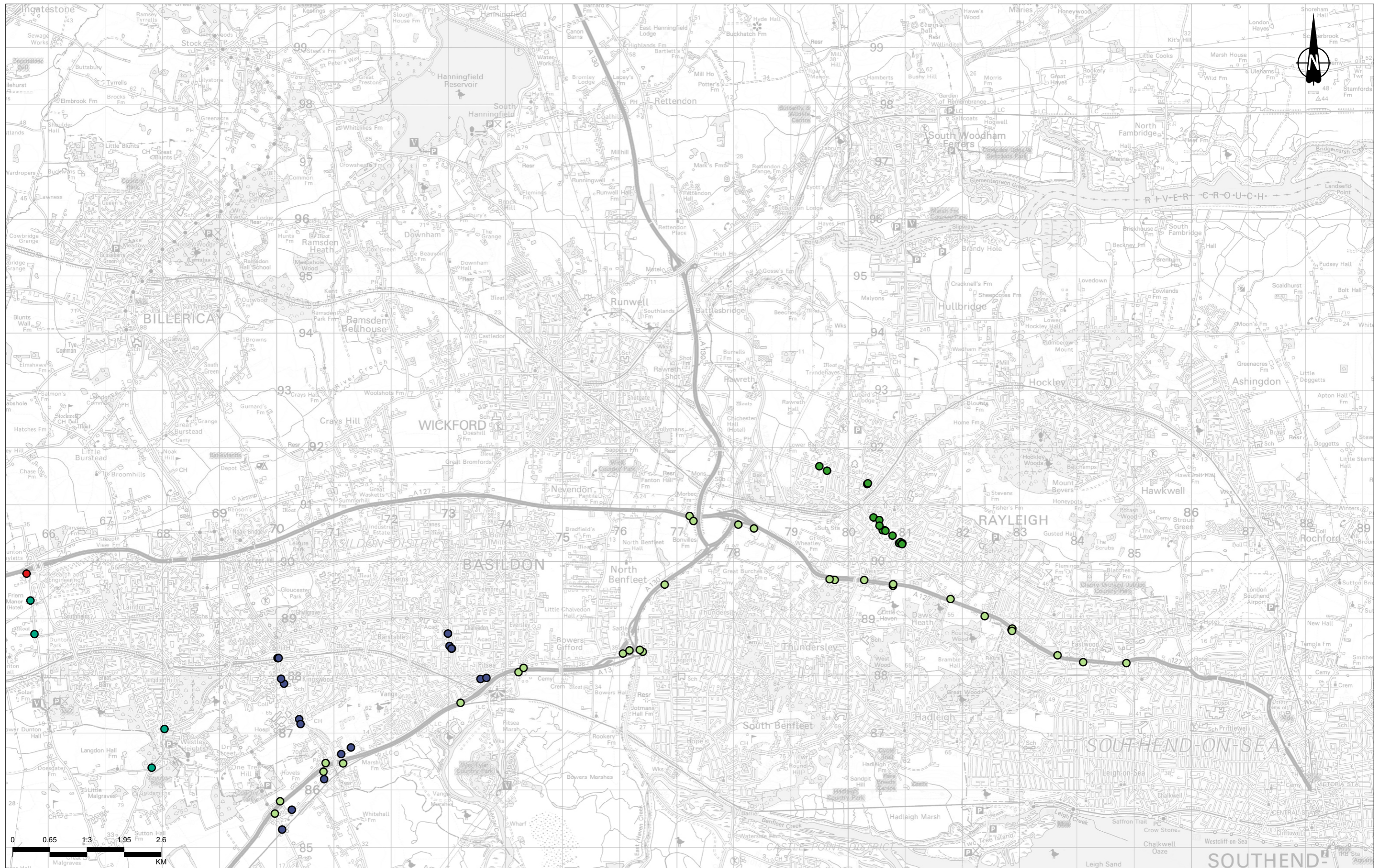
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Project: LOWER THAMES CROSSING

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Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001				

Page 8 of 12



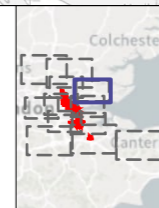


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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprv

**Legend**  
Air Quality Receptors - Verification Zone

<span style="color: green;">●</span>	3
<span style="color: red;">●</span>	4
<span style="color: blue;">●</span>	6
<span style="color: purple;">●</span>	13
<span style="color: orange;">●</span>	14

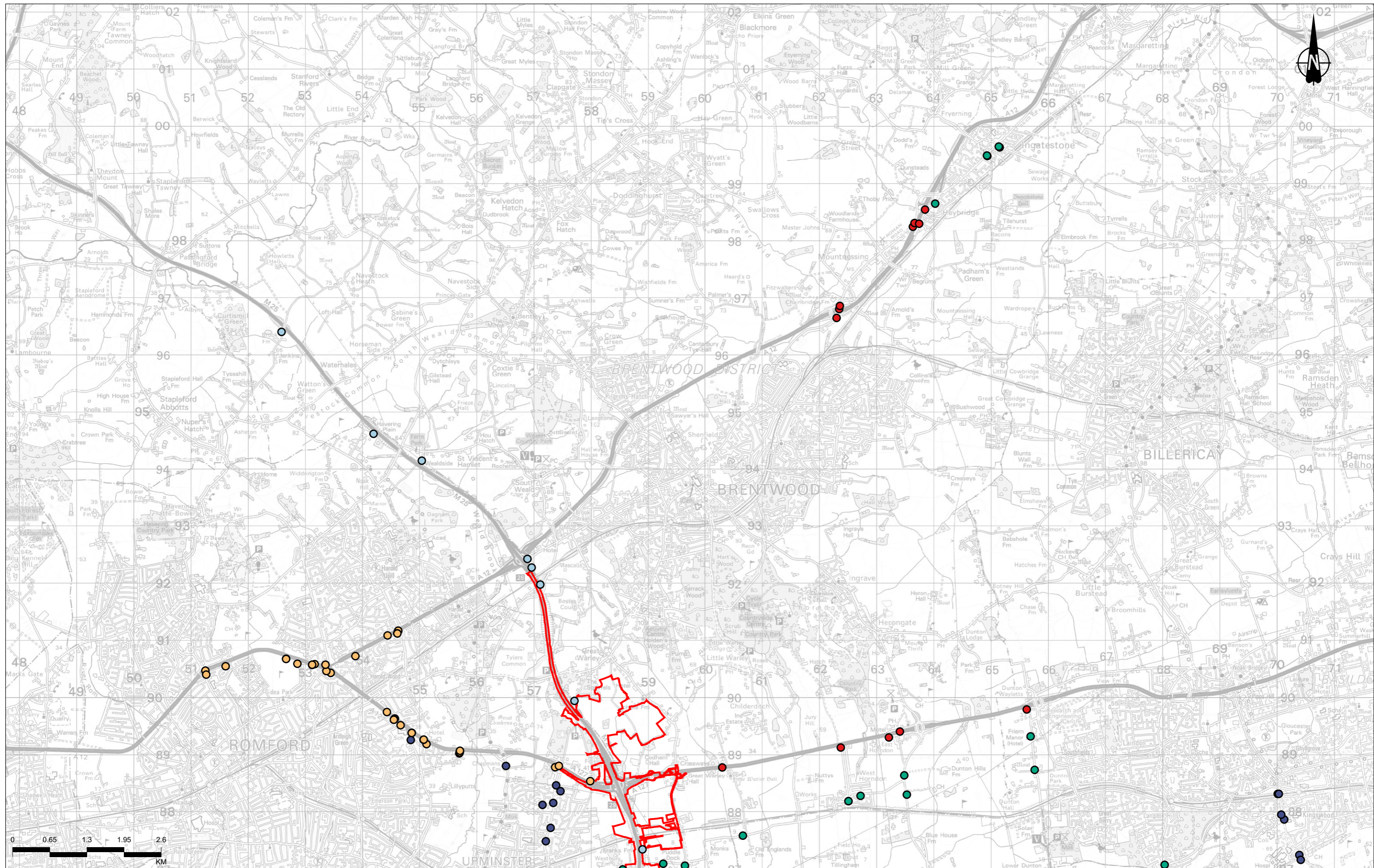


Client  
**national highways**

Project  
**LOWER THAMES CROSSING**

Status	PINS SUBMISSION	Original Size	A3	Revision	P02
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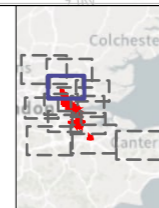


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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprd

**Legend**

- Order Limits
- Air Quality Receptors - Verification Zone
- 1
- 6
- 7
- 13
- 14



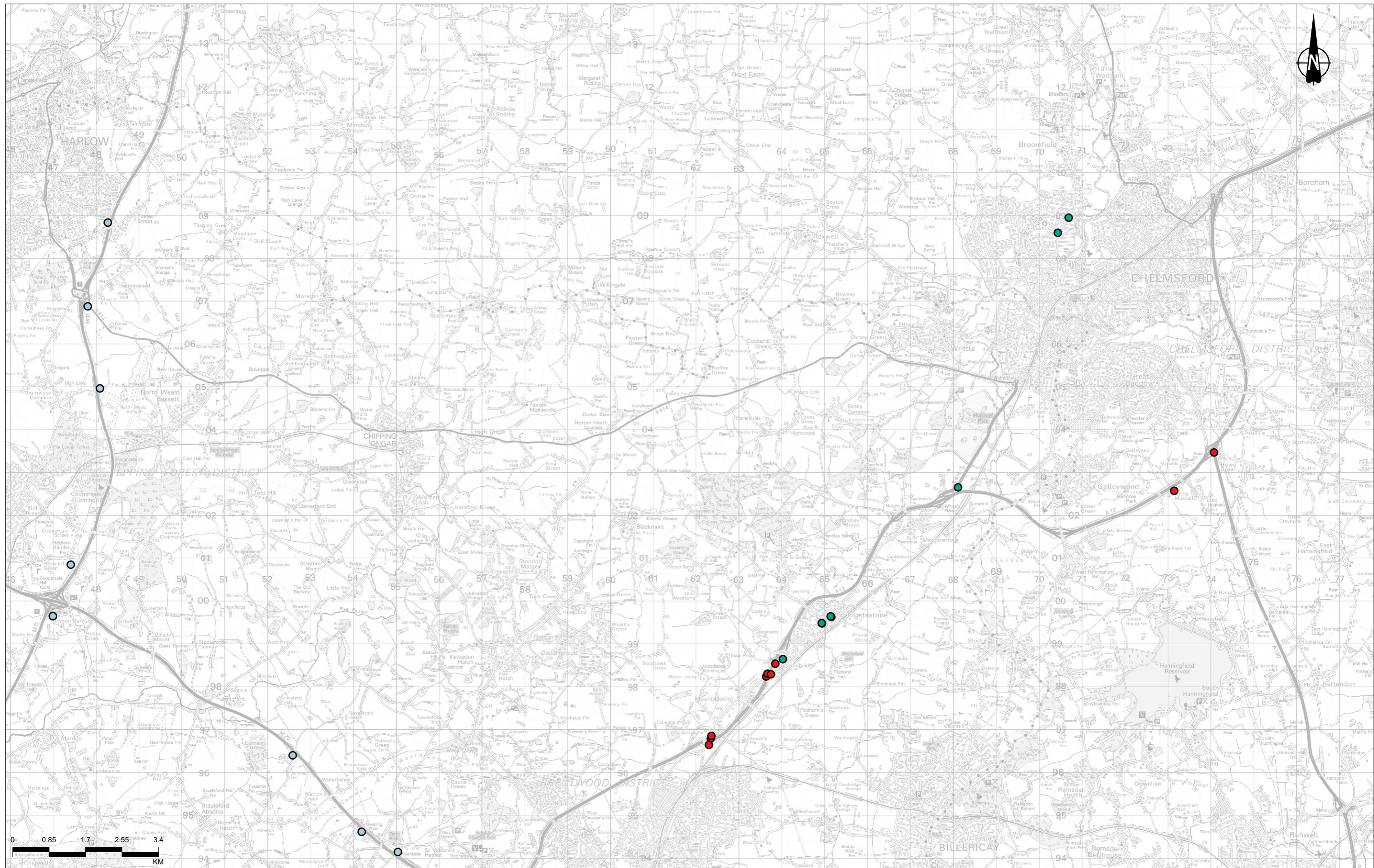
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Drawing Number	HE540039-CJV-EAQ-SZP_EGNE00000000-DR-LE-00001				

Page 10 of 12





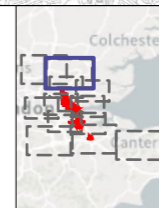
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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprvd

**Legend**

**Air Quality Receptors - Verification Zone**

- 1
- 6
- 14

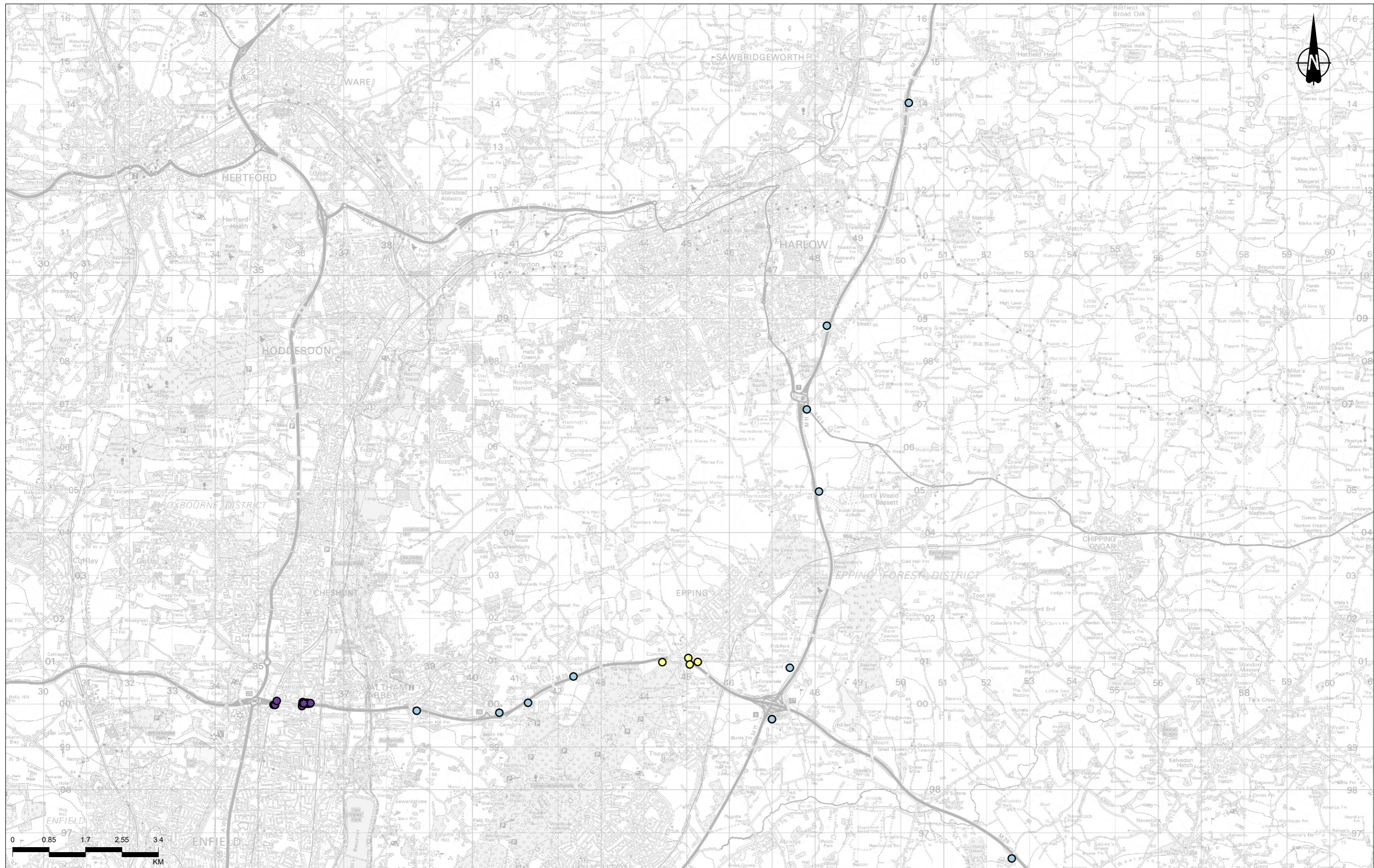


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Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001					





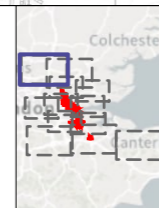
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**Legend**

**Air Quality Receptors - Verification Zone**

- 1
- 10
- 11



Client: **national highways**

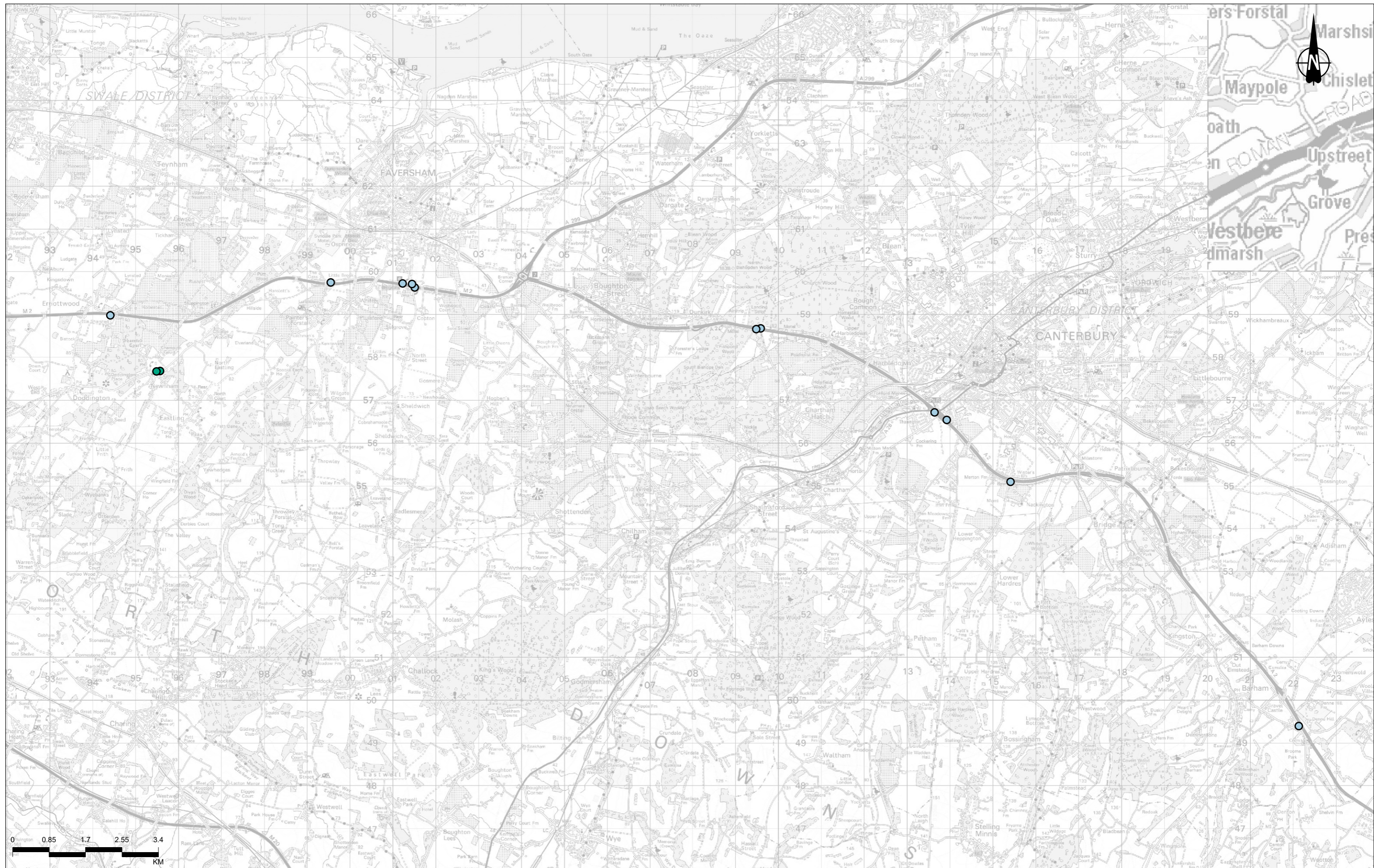
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Drawing Title	<b>Receptors and Model Verification Zones</b>				
Drawing Number	Page 12 of 12				
HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001					



## A.2 Receptors and Model Verification Zones v2.0 (Tracked changes)



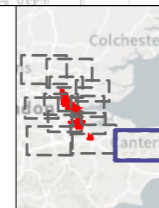


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**Legend**  
Air Quality Receptors - Verification Zone



P01	S9	22/09/2023	Deadline 5	SW	SP	FM
P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprd

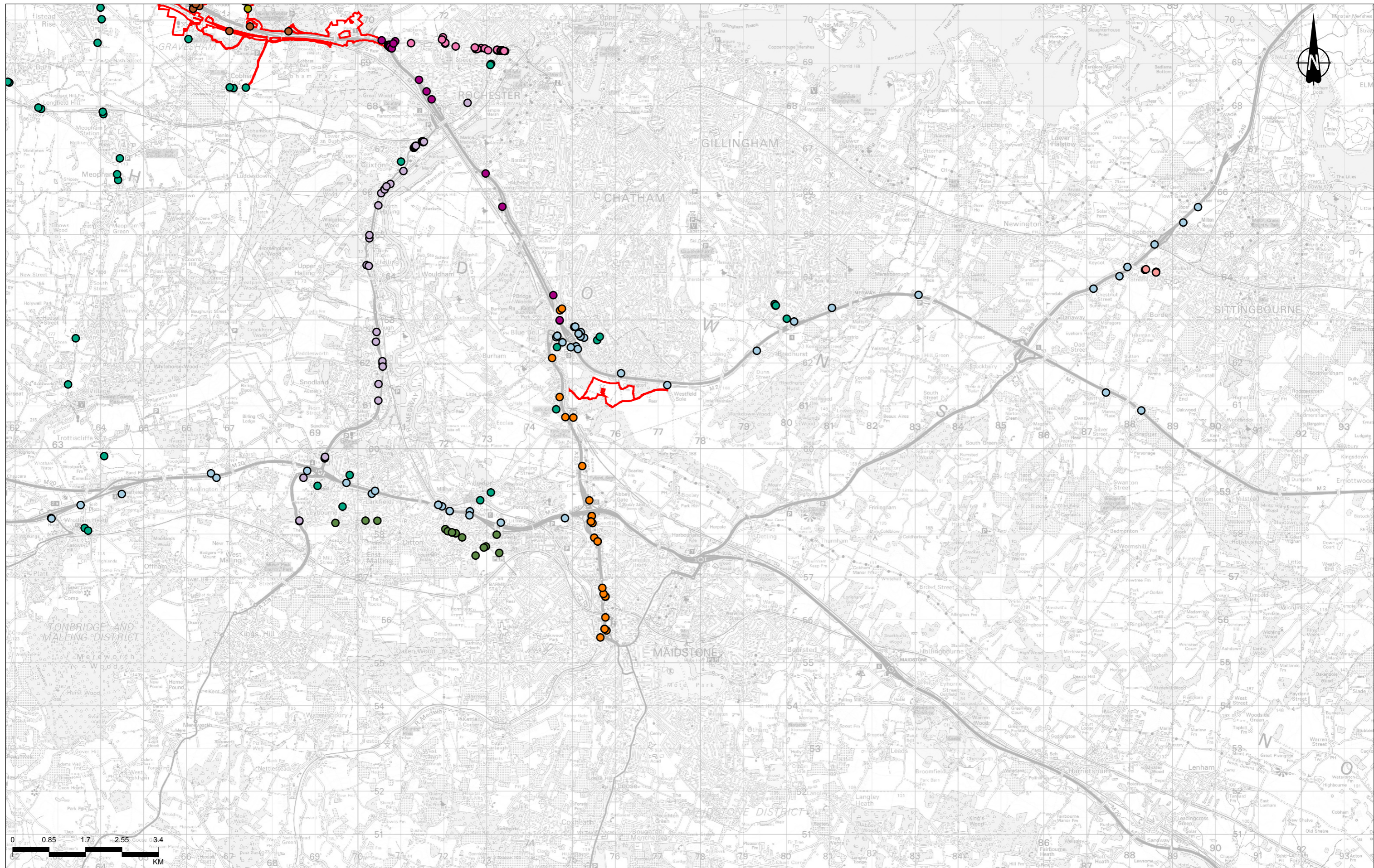


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Project  
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Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001					





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Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprvd
P01	S9	22/09/2023	Deadline 5	SW	SP	FM
P02	S9	09/11/2023	Deadline 7	MW	SP	FM

**Legend**

- Order Limits
- Air Quality Receptors - Verification Zone**
- 1
- 5
- 8
- 9
- 12
- 14
- 15
- 16
- 17
- 18

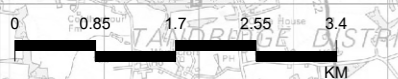
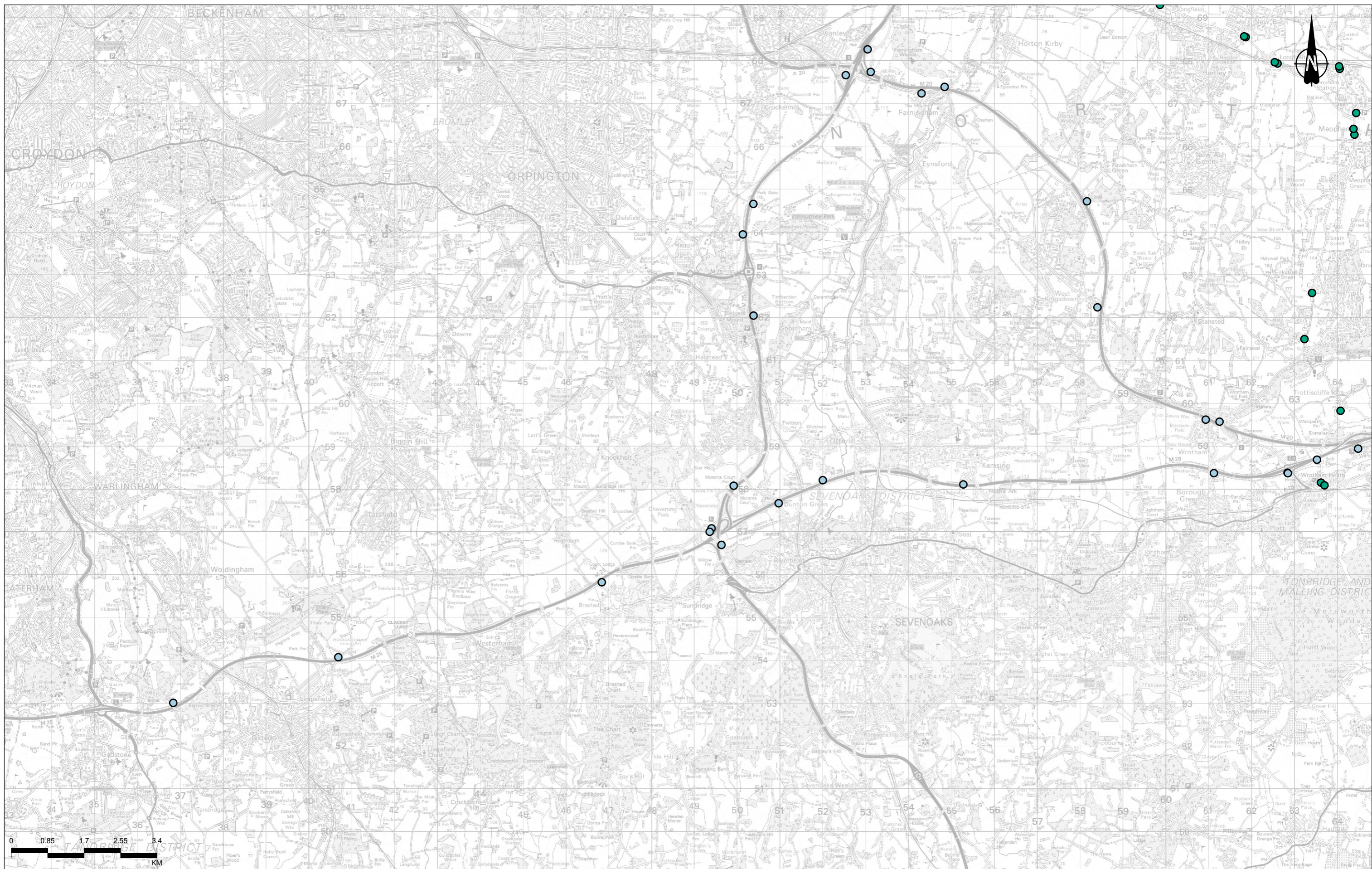


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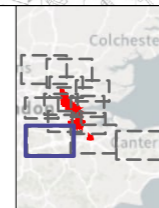


**Legend**  
Air Quality Receptors - Verification Zone



1  
14

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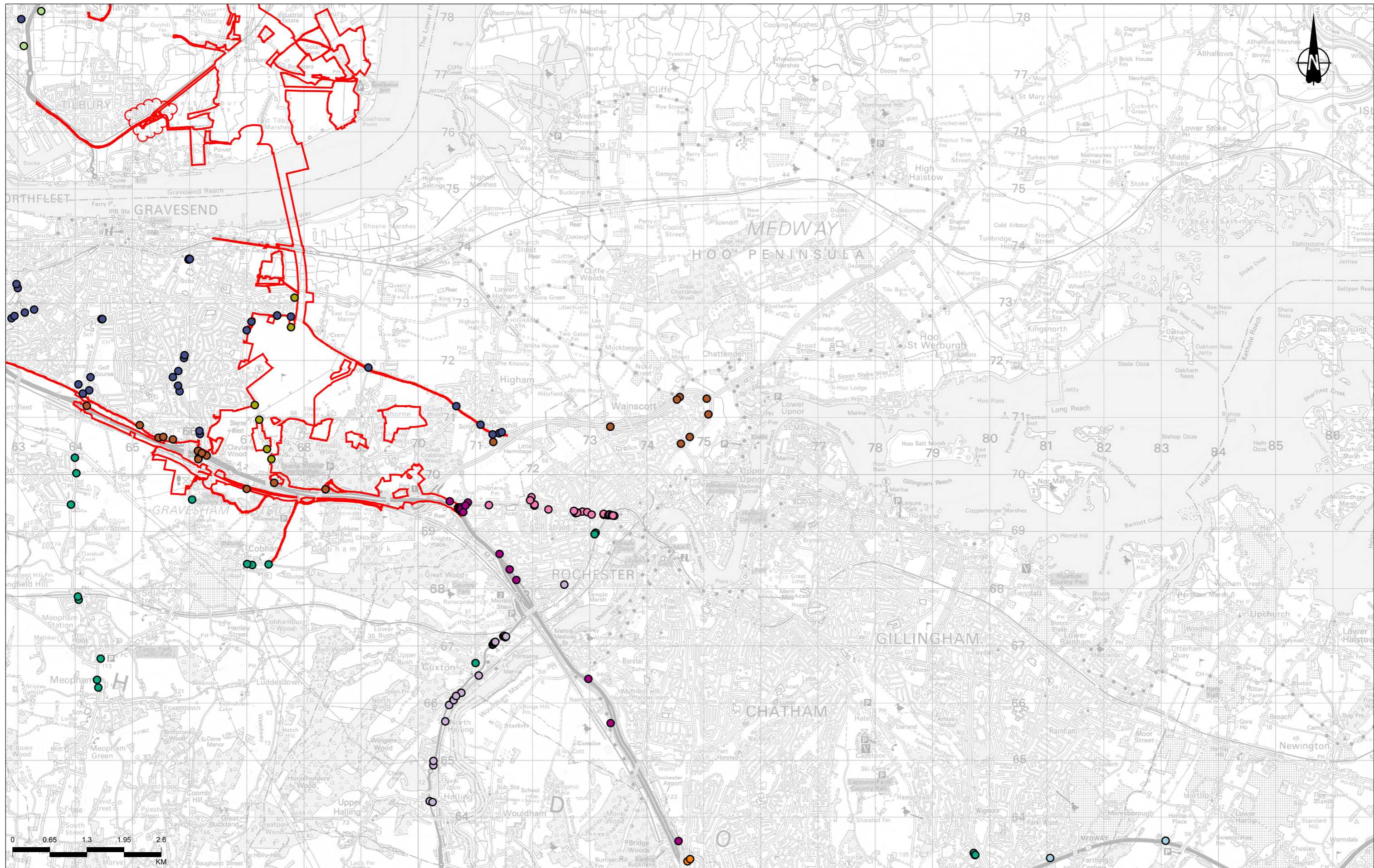


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Project  
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	Page 3 of 12					
Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001					





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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprv

<b>Legend</b>	
	Order Limits
<b>Air Quality Receptors - Verification Zone</b>	
	1
	3
	8
	9
	12
	13
	14
	16
	17
	18

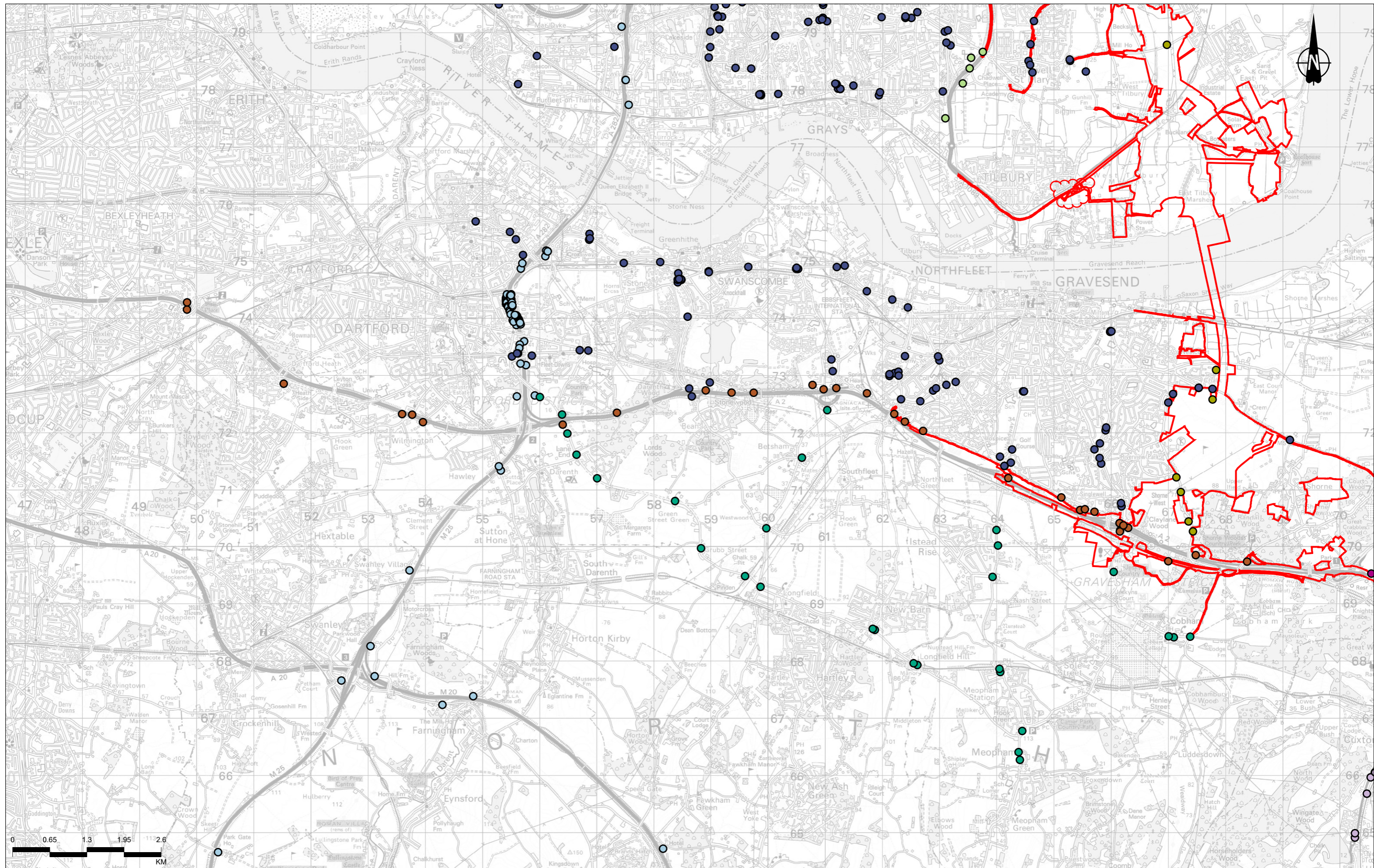


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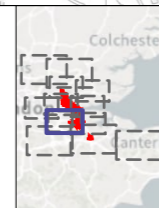


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P02	S9	09/11/2023	Deadline 7	MW	SP	FM

**Legend**

- Order Limits
- Air Quality Receptors - Verification Zone**
- 1
- 3
- 9
- 12
- 13
- 14
- 16
- 18

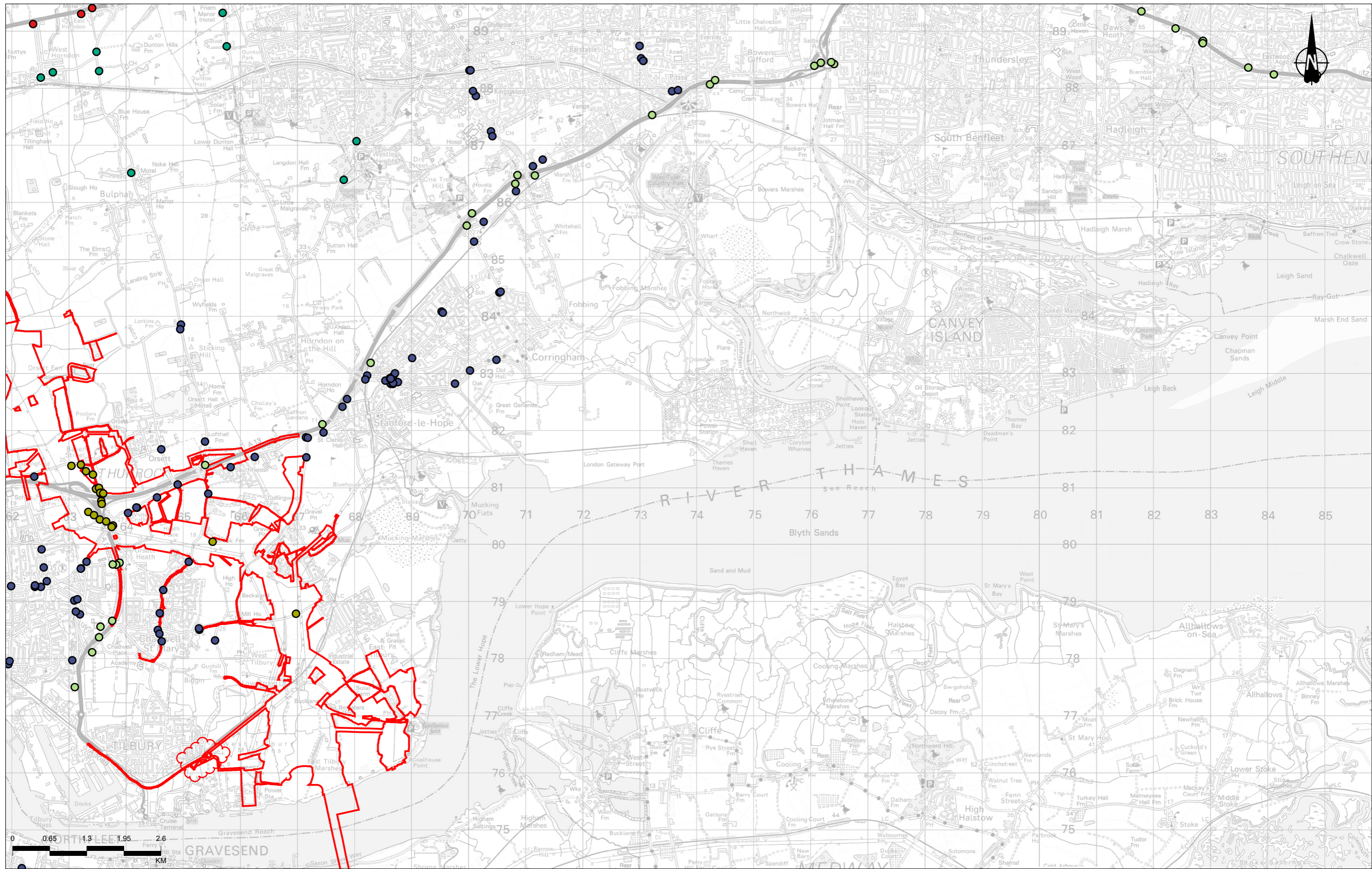


Client: **national highways**

Project: **LOWER THAMES CROSSING**

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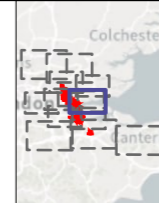




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P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Appr'd

**Legend**

- Order Limits
- Air Quality Receptors - Verification Zone
- 3
- 6
- 3
- 4
- 8

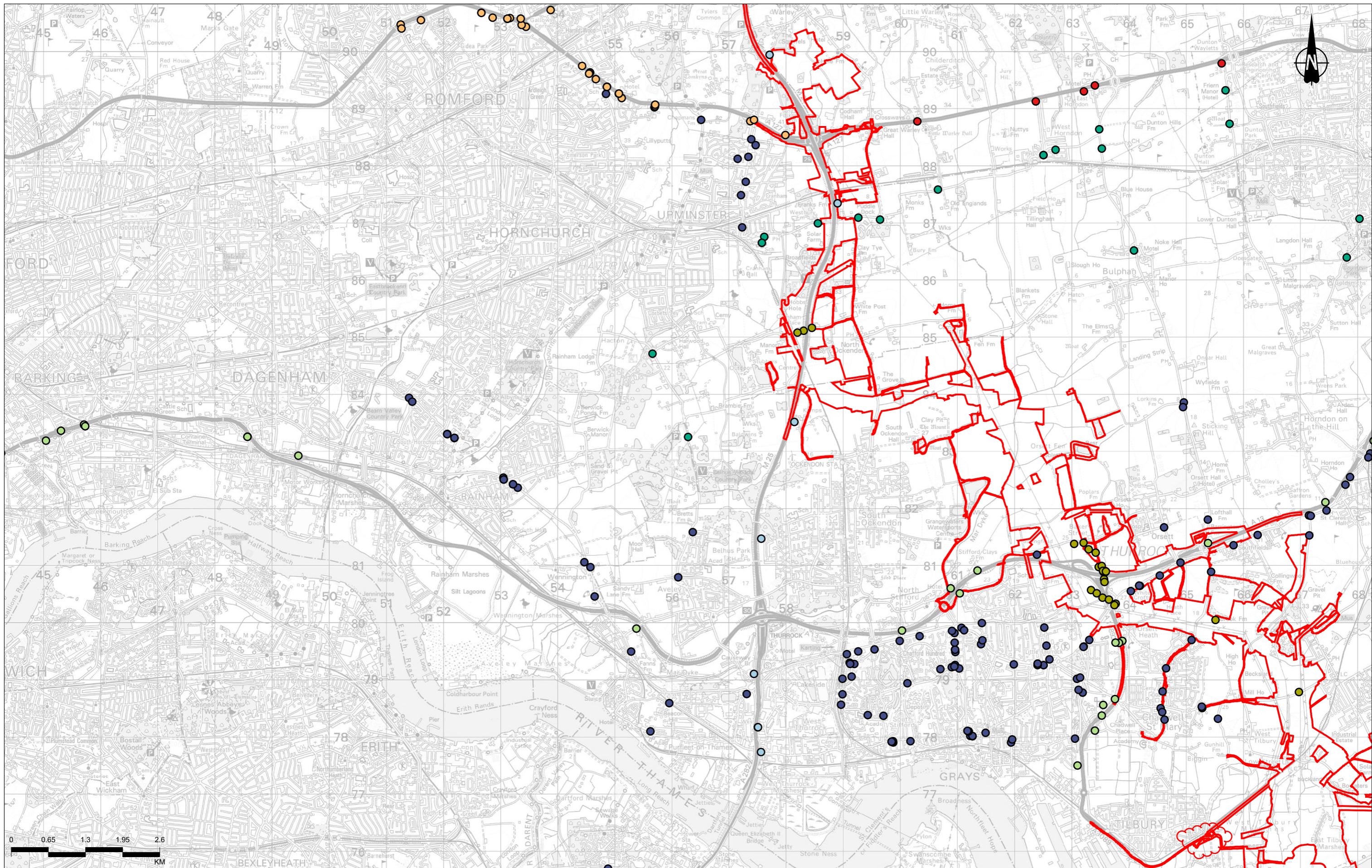


Client: **national highways**

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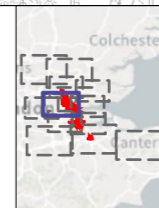


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Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	App'd

**Legend**

- Order Limits
- Air Quality Receptors - Verification Zone
- 1
- 3
- 6
- 7
- 13
- 14
- 18



Client: national highways

Project: LOWER THAMES CROSSING

Status	PINS SUBMISSION	Original Size	A3	Revision	P02
Application Document Number	TR010032/EXAM/9.176	Scale	1:60,000		
Drawing Title	Receptors and Model Verification Zones				
Drawing Number	HE540039-CJV-EAQ-SZP_EGNE00000000-DR-LE-00001				

Page 7 of 12



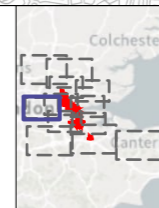


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Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprv'd
P01	S9	22/09/2023	Deadline 5	SW	SP	FM
P02	S9	09/11/2023	Deadline 7	MW	SP	FM

**Legend**  
Air Quality Receptors - Verification Zone

- 1
- 2
- 3
- 12
- 13



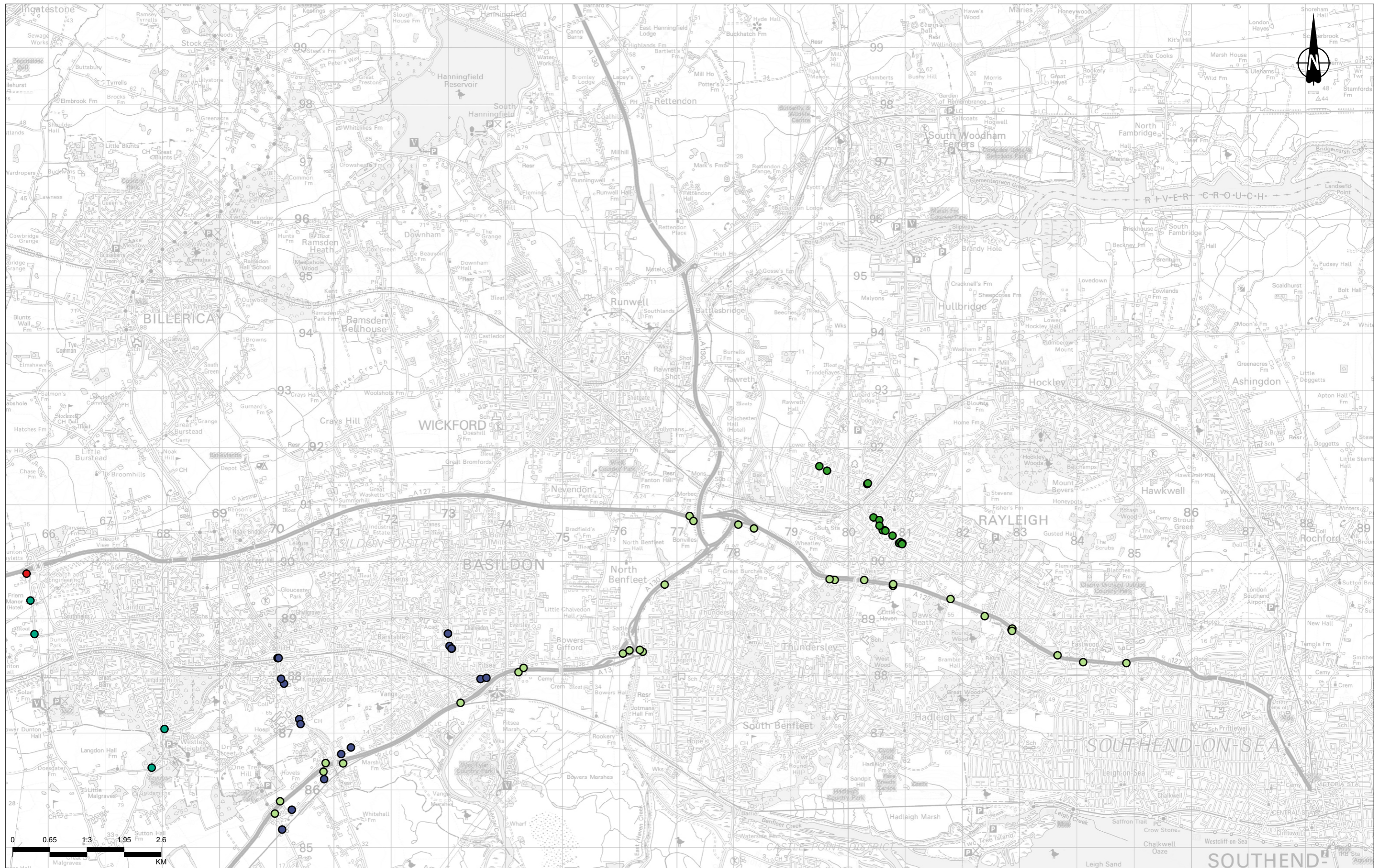
Client: **national highways**

Project: **LOWER THAMES CROSSING**

Status	PINS SUBMISSION	Original Size	A3	Revision	P02
Application Document Number	TR010032/EXAM/9.176	Scale	1:60,000		
Drawing Title	Receptors and Model Verification Zones				
Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001				

Page 8 of 12



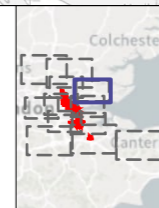


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P01	S9	22/09/2023	Deadline 5	SW	SP	FM
P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprvd

**Legend**  
Air Quality Receptors - Verification Zone

- 3
- 4
- 6
- 13
- 14

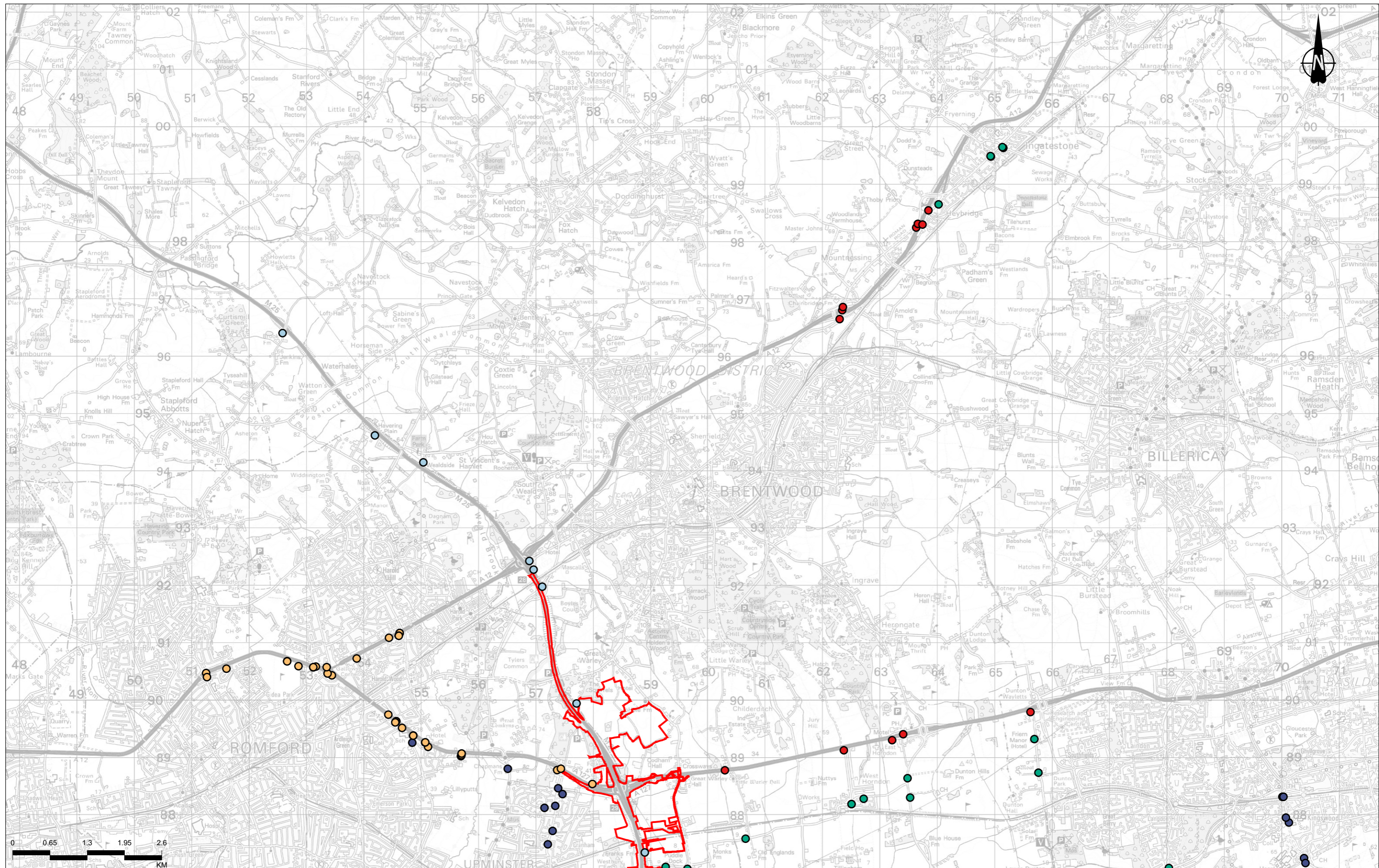


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Project: **LOWER THAMES CROSSING**

Status	PINS SUBMISSION	Original Size	A3	Revision	P02
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	Page 9 of 12				
Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-0001				



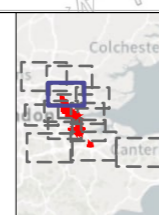


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P01	S9	22/09/2023	Deadline 5	SW	SP	FM
P02	S9	09/11/2023	Deadline 7	MW	SP	FM
Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprv

**Legend**

- Order Limits
- Air Quality Receptors - Verification Zone
- 1
- 6
- 7
- 3
- 14



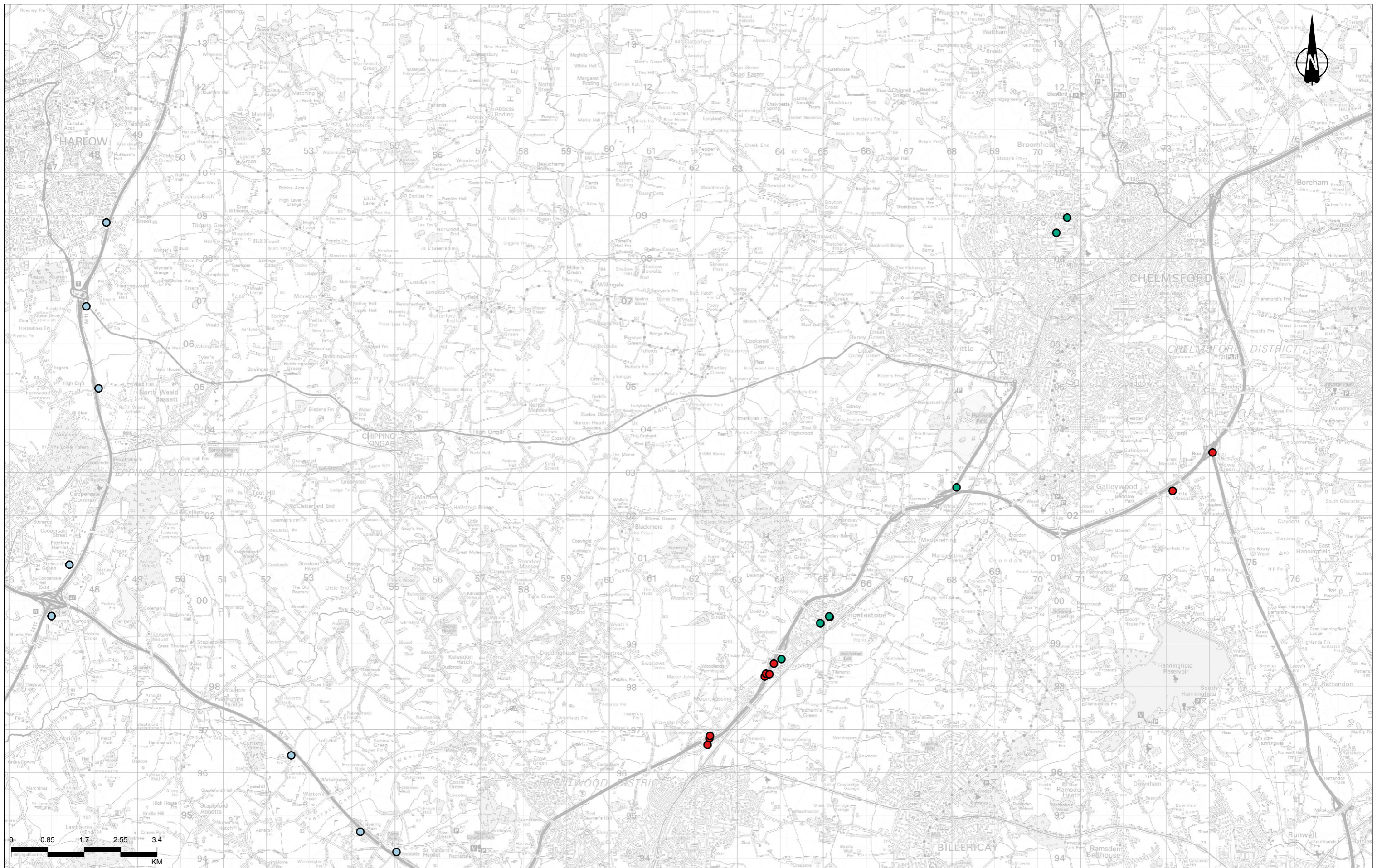
Client: national highways

Project: LOWER THAMES CROSSING

Status	PINS SUBMISSION	Original Size	A3	Revision	P02
Application Document Number	TR010032/EXAM/9.176	Scale	1:60,000		
Drawing Title	Receptors and Model Verification Zones				
Drawing Number	HE540039-CJV-EAQ-SZP_EGNE00000000-DR-LE-00001				

Page 10 of 12



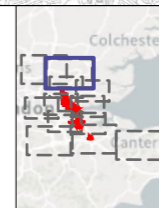


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P01	S9	22/09/2023	Deadline 5	SW	SP	FM
P02	S9	09/11/2023	Deadline 7	MW	SP	FM

**Legend**  
Air Quality Receptors - Verification Zone

- 1
- 6
- 4

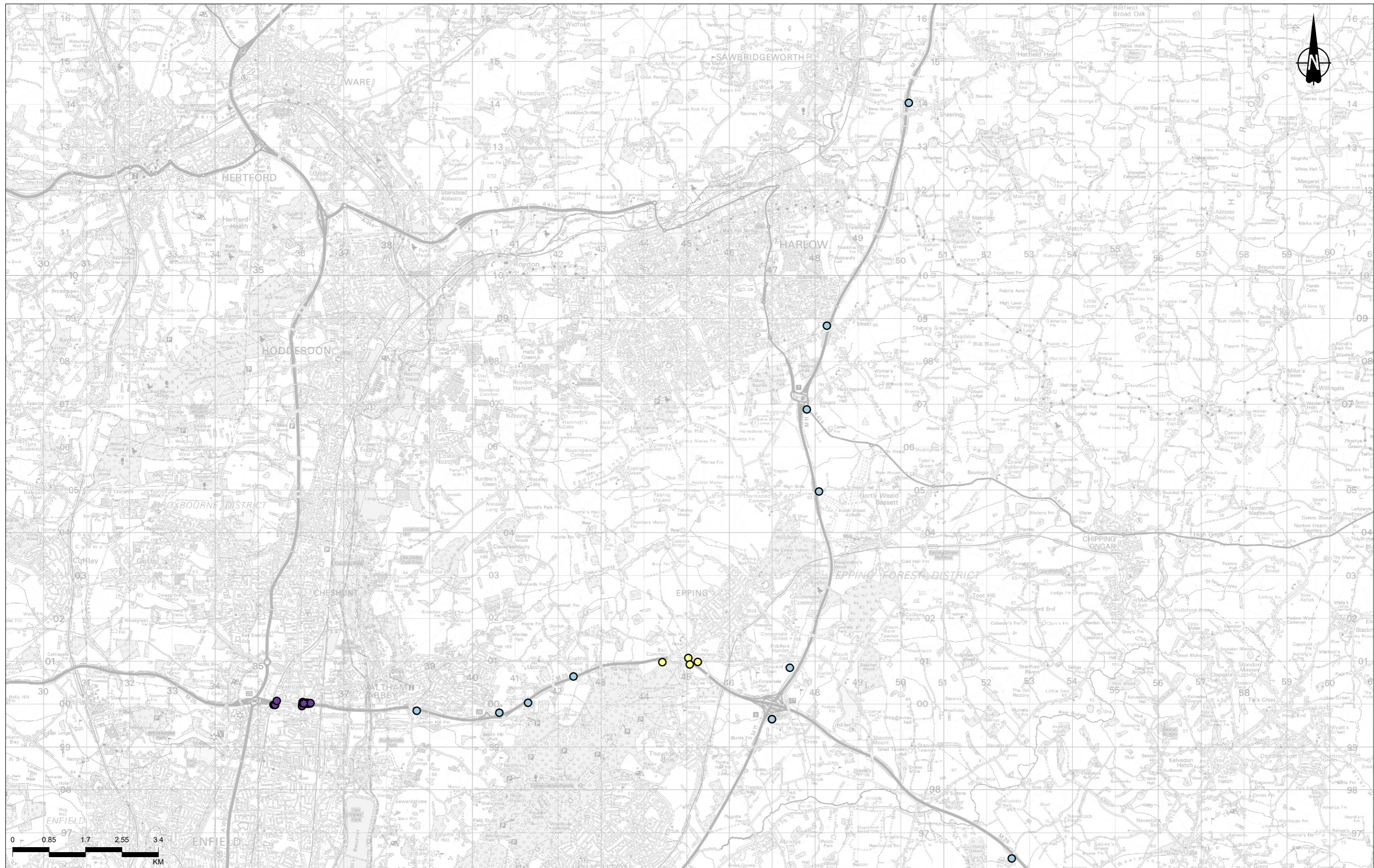


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Status	PINS SUBMISSION		Original Size	A3	Revision	P02
Application Document Number	TR010032/EXAM/9.176		Scale	1:80,000		
Drawing Title	Receptors and Model Verification Zones					
	Page 11 of 12					
Drawing Number	HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001					





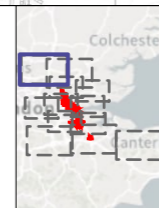
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Rev	Status	Rev. Date	Purpose of revision	Drawn	Chkd	Apprv
P01	S9	22/09/2023	Deadline 5	SW	SP	FM
P02	S9	09/11/2023	Deadline 7	MW	SP	FM

**Legend**

**Air Quality Receptors - Verification Zone**

- 1
- 10
- 11



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Project: **LOWER THAMES CROSSING**

Status	PINS SUBMISSION	Original Size	A3	Revision	P02
Application Document Number	TR010032/EXAM/9.176	Scale	1:80,000		
Drawing Title	<b>Receptors and Model Verification Zones</b>				
Drawing Number	Page 12 of 12				
HE540039-CJV-EAQ-SZP_EGNE0000000-DR-LE-00001					



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