
Lower Thames Crossing

Savills Note on CAH5 Oral Submissions

Quality management			
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1 Introduction

1.1 SJC Interests

- 1.1.1 SJC possesses Category 1 interests in plots 09-01, 10-01, 10-13, 10-14, 10-15, 10-16, 11-68, 11-70, 11-71, 11-72 and 11-77 as outlined in the Land Plans [REP3-011] and Book of Reference [REP3-085], which LTC is seeking to acquire by compulsory purchase.
- 1.1.2 There are no issues of hardship or requests for non-statutory relief and neither the Human Rights Act (ECHR) rights nor the Public Sector Equalities Duty (PSED) are engaged.
- 1.1.3 Savills advises land owners on the best use of land including many of the great estates. We advise on the retention of best and most versatile land and use of more marginal land for BNG, rewilding, water, carbon, nitrate and phosphate management (so-called stacking) focusing on an efficient use of land, so when we see best and most versatile land being promoted for such purposes it is bound to raise questions.

2 Current Scope of Objection

2.1 Introduction

2.1.1 This section summarises the current scope of SJC's objection.

2.2 Failure to Engage

2.2.1 SJC considers only limited engagement has taken place between the Applicant and SJC and none at all between 27 September 2023 and 15 November 2023.

2.2.2 SJC believe the Applicant has not meaningfully considered the suggestions made by SJC that alternative sites may be available to acquire or secure by private treaty and which would not result in the loss of best and most versatile farmland. In this regard, very limited engagement with LTC has occurred on the voluntary acquisition of SJC land, although it is acknowledged that this has now recommenced. Whereas engagement between the Applicant and SJC commenced in September 2019 this has been sporadic and unstructured.

2.2.3 At Examination Deadline 4 there were nine matters set out in a draft SOCG which SJC had instigated, which the ExA had seen of which eight were under discussion and one was not agreed. There has been no further dialogue and no further progress has been made on any of these matters since Deadline 4. It is acknowledged that this has now recommenced but SJC consider it unlikely that LTC is likely to respond constructively to the points it has made on the evidence submitted by LTC to date to the Examination.

2.3 Objection to Powers of Compulsory Acquisition

Nitrogen Deposition (plots 09-01, 10-13, 10-14 and 10-16)

2.3.1 SJC **objects** to powers of compulsory purchase of land for Nitrogen Deposition compensation on the basis that it has **not** been shown that 1) no alternative exists, 2) that the need is compelling, 3) that the land is appropriate for the purpose sought and 4) that each of the statutory tests has been met. SJC **objects** to powers of compulsory purchase of land for Ancient Woodland compensation on the basis that it has not been shown that that no alternative exists, the need is compelling, that the land is appropriate for the purpose sought and that each of the statutory tests has been met. SJC does **not object** to the powers of temporary possession on the assumption that it will be possible to show to SJC's satisfaction that the land has been returned in favourable condition and subject to proper compensation for the loss of use of the land.

2.4 Site Selection Methodology

- 2.4.1 SJC consider the methodology employed in the Project Air Quality Action Plan (PAQAP) Appendix 8.14 of the ES) is **not sufficiently robust** to justify the compulsory acquisition of its land. We have the following specific concerns:
- 2.4.2 Table 3.1 of the Project Air Quality Action Plan identifies a total of 184.73 ha of designated ecological sites, including **82 ha of Ancient Woodland and 82 ha of SSSI** where the LTC has a significant adverse effect due to nitrogen deposition. Table 6.5 of the PAQAP indicates that this would be reduced to approximately 176 ha after mitigation measures have been implemented (96% of the total area affected is not mitigated). 53.9 ha which is 27% of Shorne and Ashenbank SSSI and 11.2 ha or 17% of Shorne/Brewers Wood Ancient Woodland would be significantly affected by nitrogen deposition, extending to nearly the full extent of the Applicant's study area, comprising a swathe of land 200m wide from both sides of the motorway, as shown on Figure 2 of Appendix 8.14 of the ES Doc APP-404 (we looked at p32, p33 and p34 of 89 in the key, but similar comments apply elsewhere eg p37, includes land that would be physically destroyed and has no absolute values of Ndep but is affected by new highway, so the baseline should have been low, p39, 40, 41 – what is causing the effect shown and why is it not controlled?). These figures are difficult to decipher and it is unclear what the purple lines are intended to represent. It is assumed that these might be an indication of the boundaries of the future highway but it is unclear what the physical works would be that would directly affect the habitats in this area.
- 2.4.3 By reference to Figure 1 appended it is unclear what part of the highway network affects land parcel a of 4.6 hectares which is more than 200 metres away from the main route but it appears to be adversely affected by traffic increases along Thong Lane.
- 2.4.4 It is similarly unclear what part of the highway network affects land parcel B 4.6 hectares unless it is increases in traffic flows along Brewers Rd. This area excludes parts of Sean woods adventure centre but appears to include substantial areas of car parking, the visitor centre and café.
- 2.4.5 We think that Area C will be physically destroyed by new highway but has been included for the purposes of the nitrogen compensation calculations and that's double counting.
- 2.4.6 In terms of area D we are unclear why increases in traffic flows along Halfpence lane are allowed and lead to the whole of this area being affected.
- 2.4.7 None of these effects are reduced by mitigation, as the Applicant does not propose to mitigate these effects seem to overestimate the area of land that

could be mitigated but needs to be compensated for by compulsory acquisition. We question whether this can be justified.

- 2.4.8 SJC are concerned by 1) the scale of the harm caused to nationally designated ecological sites, comprising irreplaceable Ancient Woodland and SSSIs and 2) that the Applicant does not propose to mitigate these effects. I should emphasise here that mitigation is different to the compensation proposed on SJC land, and that mitigation should come first in the hierarchy of measures. This concern relates particularly but not exclusively to Shorne and Ashenbank Woods SSSI and Shorne/Brewers Wood Ancient Woodland.
- 2.4.9 We are further concerned that DMRB guidance is being followed and applied in a poorly considered way without the use of professional judgement. We question what precedents there are for this type of approach and where it has been applied before successfully.
- 2.4.10 In Table 6.1 of the PAQAP the Applicant sets out potential mitigation measures that it has considered to varying degrees, based upon its own guidance, which it has rejected at this location. Physical barriers, speed limit reductions and speed enforcement management were considered on a site-by-site basis and rejected here as in most places.
- 2.4.11 The Applicant claims that it does not have the powers to designate clean air zones or low emission zones on its network or to implement changes to management of roads on the local network. As this is a DCO application it would be helpful if the Applicant could explain why it was unable to implement any such powers through the Order. SJC notes that it is common for Traffic Regulation Orders to form part of DCOs, that TROs can be used impose speed restrictions among other measures, and that certain TROs are in fact included in the LTC draft DCO – albeit not to mitigate nitrogen deposition.
- 2.4.12 SJC notes National Highways guidance on 9m high physical barriers but questions to what practical extent it has used these for this purpose elsewhere and to what extent NH considered cut and cover through the Shorne Woods section of the route. SJC is not convinced that design measures such as this are to be put forwards by consultees or that it should sit outside a basic engineering tool box for what is, after all, a tunnelling project.
- 2.4.13 Table A.1 of the PAQAP (p92-93) sets out that speed control along this stretch of the project was not deliverable. Speed control would normally be considered to be a primary measure to reduce emissions. SJC has found Table A.1 to be impenetrable and requests an explanation in plain English as to why NH is unable to enact speed control on this part of the route or confer the powers to do so through the DCO and if they say this causes traffic to

reroute, why traffic would reroute from the new crossing, presumably via Dartford?

- 2.4.14 In Table 6.1 of the PAQAP LTC discounts a range of measures that it states would be regarded as compensatory rather than mitigation, including planting of trees or a shelter belt, site management to prevent or reduce other nitrogen inputs, such as dog faeces, or the underlying total nitrogen deposition (which is up to approximately 100 times greater than the inputs from the project) through measures such as removal of biomass, or to improve resilience to nitrogen deposition by reducing other threats to the habitat.
- 2.4.15 On p112 of Part 1 of Appendix 8.14, APP – 403, it is noted that Natural England describe Shorne Woods SSI as being in favourable condition. LTC’s survey (p113) noted that no vegetation gradient was observed (which suggest that nitrogen deposition is not having an effect). It is clear from inspection and the ExA will have seen during its site visits that trees are growing in close proximity to the highway – right up to its boundary and between the east-west split carriageways in this area. Survey notes on active management indicate the only visible management is path maintenance, suggesting that further management is likely to be additional. Required or beneficial management include the control of erosion close to the road by signage, temporary fencing and planting. Invasive rhododendron and laurel should be removed and controlled and bramble could also be controlled.
- 2.4.16 The survey goes on to note that the Ancient Woodland is well used by members of the public and school groups, so will have associated pressures, including disturbance to wildlife and habitats, littering and dogs. Pressures include erosion, rhododendron, buddleia and laurel growth with bramble incursion. These are all matters that could be readily managed to improve the resilience of the AW and SSSI to threats.
- 2.4.17 It is convenient for LTC to describe these measures as compensation rather than mitigation because in doing so such measures fall down their hierarchy. SJC does not agree with LTC’s definition of mitigation and it seems that such measures would be mitigation of the effects of nitrogen deposition and not compensation for these. This is because the measures either reduce nitrogen emissions at source or seek to reduce the consequent deposition. SJC would be interested in the Examining Authority’s view of our interpretation here.
- 2.4.18 Section 6.3 (on p25) of the PAQAP (APP-350) provides the conclusion on mitigation feasibility. In summary, no mitigation is considered feasible by LTC using their definition, other than speed enforcement management between junctions 3 and 4 of the M2. This speed enforcement management is to enforce the national speed limit so it is not clear how this goes beyond National Highways’ existing responsibilities. No other mitigation of emissions is

proposed and LTC does not propose to mitigate the impacts at the locations where the proposals have their greatest impact.

- 2.4.19 Now turning to the proposed compensatory measures, which SJC does not accept are justified in the absence of properly considered mitigation, these are set out in Section 7 of the PAQAP. Habitat management measures within affected sites are discounted with what SJC considers to be weak reasoning and weak analysis. Little consideration or characterisation of other pressures on the affected sites is given and the claim is made that measures are available that would definitely build resilience for all sites. SJC does not consider that the case has been made that the measures proposed have been shown to **definitely build resilience for all sites** in the way LTC claims or that it would be possible to conclude that what LTC proposes would fully compensate for the impact of unmitigated nitrogen deposition at the affected sites.
- 2.4.20 At 7.13 to 7.14 of the PAQAP, LTC claims that management measures would not have sufficient precision to be regarded as both additional to existing practices and to only relate to the threat posed by additional N deposition. This seems at odds with its listing of these management measures in the preceding section on mitigation and the five points listed under 7.3.10. LTC seems to argue on the one hand that management measures can be used to compensate for nitrogen deposition but on the other hand can never be additional and so cannot ever be employed. In addition, LTC also appears to argue implicitly that for nationally designated sites the normal practices that are already required for maintaining and restoring site features will be ineffective but nevertheless that these already address the effects of the Project, which have not yet happened. Both things cannot be true.
- 2.4.21 In Table 6.1 (p14) LTC accepts that reducing other sources of nitrogen or removing nitrogen from the ecosystem may offset the effects of Project-induced N deposition and that this could be achieved through measures such as removing biomass (e.g., holly understory). Other methods not considered by LTC could include planting certain species to preferentially capture nitrogen or remove it from the soil, or using a mulch and removing that.
- 2.4.22 At 7.3.19 of the PAQAP, LTC describes measures such as removing biomass or fencing to reduce disturbance to be one-off measures. They say that such measures could have longer term benefits but could not be considered as resilient and sustainable in perpetuity unless the measures were committed to on an ongoing basis. SJC would be very interested to understand why LTC does not consider that it should commit to measures on an ongoing basis and to rule this out. To suggest it would be a one off measure is simply wrong if they were to commit to ongoing management.

2.5 Precautionary Approach and Double Counting

- 2.5.1 SJC is concerned that the precautionary approaches adopted by LTC would lead to a higher quantity of land being assessed as affected than would happen in reality. SJC considers that the absolute value of Ndeposition as well as the change in Ndeposition should be considered. It is accepted that Ndeposition is likely to be higher closer to the highway than further away but SJC has not been able to identify where this information is illustrated and assessed in the application by reference to species that are sensitive to Ndeposition, which are said to be present.
- 2.5.2 LTC does not take account of the improvements in Ndeposition that occur over time, in line with the increasing introduction of electric vehicles and other measures in UK policy to manage air pollution. SJC would like to seek clarification on what improvements in vehicle emissions have been considered beyond 2030.
- 2.5.3 It also seems that LTC treats areas of land that are not sensitive to Ndeposition as if they are: for example, the railway and areas of land that would be physically removed by the new highway. We have prepared a plan that illustrates this, which is attached as Figure 1.

2.6 Inadequate Consideration to the Acquisition of Land by Private Treaty

- 2.6.1 SJC believes that inadequate consideration has been given to the acquisition of third party land by private treaty, which would avoid the need for compulsory acquisition. This includes SJC's land, upon which there was a without-prejudice discussion on the acquisition of a smaller parcel of land or the management of a wider parcel of land which ceased on 27 September 2023 with no further communication from LTC. SJC's preference was for a long lease arrangement on the proposition it sent to LTC on 07 July 2023, which was also appended to our earlier submissions and is appended again here as Figure 2. In response to a without-prejudice offer by LTC to reduce the land take by one third, SJC requested a more refined plan that minimises the impact on the field adjacent to Shorne so that it could continue to be farmed, retains accesses between fields and provides more detail on what LTC would propose to do and why in each field parcel.
- 2.6.2 At 15:41 on Wednesday 15 Nov LTC advised SJC of LTC's decision to withdraw from the without-prejudice discussions, suggesting that this would ultimately compromise their stated objectives that have already been examined by the panel and other stakeholders. LTC advised SJC that it would be pleased to have a general discussion in respect of a way forwards on Thursday or Monday. SJC considers that LTC has wasted SJC's time in

preparing for and undertaking these discussions, when it appears not to have had an intention of reaching a negotiated agreement in good faith.

- 2.6.3 Inadequate consideration has also been given to the availability of suitable land further from the project, given the study area used by LTC. We attach a number of alternative land parcels that could have been considered as Figure 3.

2.7 Weighting of Agricultural Land

- 2.7.1 SJC believes inadequate weighting has been attributed to the loss of Grade I and Grade II agricultural land at a time where food security is of increasing national importance. While the Applicant considers the impact on best and most versatile land in Environmental Statement Chapter 10: Geology and Soils, SJC considers that this has been given less weight than is warranted, not least because food security issues have become increasingly important due to international conflict and climate change and because best and most versatile agricultural land is recognised as a finite, non-renewable and non-replaceable resource. SJC invites the ExA to give this matter greater weight than LTC does.

2.8 Compensation

- 2.8.1 SJC believes that compensation specifically for nitrogen deposition is no part of the Applicant's proposal, in other words the removal of nitrogen, or mitigation of the consequences of nitrogen deposition from soils along the ARN, noting our previous comments that aspects of this would correctly be termed mitigation.
- 2.8.2 The Applicant has determined, on a precautionary basis, that the Project would have a negative effect of nitrogen deposition on habitats in close proximity to the highway, although it is not clear that the actual effect on target species, if any, has been established and if so, what these target species are, or where they are, sufficient to assess this. SJC has sought clarification from LTC on what the target species are that are affected by N deposition but has had no clear response.
- 2.8.3 The Applicant has asserted that it needs to provide compensation for impacts on designated sites, such as Shorne and Ashenbank Woods SSSI of an equivalent area. LTC have explained that the purpose of compensation land is to provide connectivity between habitats of a similar type. It is not clear from the application why the area needs to be equivalent, rather than simply being capable of providing such connectivity and SJC queries the logic as to why the quantum is required in addition to the functionality. LTC does not relate the rationale to the species present and equally does not relate this rationale

to nitrogen deposition in its application. LTC has asserted that it does so, but has not substantiated this. LTC appears to have persuaded Natural England that it is appropriate to provide an equivalent area of land but with respect, this is not the same as showing that it is necessary, with clear, unambiguous scientific reasoning (as opposed to an unsubstantiated opinion (see PAQAP 7.3.48)).

- 2.8.4 LTC's proposals do not appear to provide connectivity between habitats of a similar type, for example the land to the west of the nitrogen compensation area appears to be under considerable pressure from recreational and other activity, connects to the village of Shorne, rather than a habitat, and is very open compared with the habitat to the east. SJC is therefore unclear what habitat is being connected with to the west in this case, or what value it has, or is likely to have in the future. SJC considers its proposals to be better thought through and planned than some of the basic cartoons produced by LTC.

3 Summary

3.1 Mitigation

- 3.1.1 There are no proposals for mitigation of effects. The reduction of the speed limit below 70 mph was discounted without quantification of the benefit and there are no other feasible methods of mitigation available, according to LTC (subject to our comments on management, the interpretation of mitigation and compensation).
- 3.1.2 The only effective method is speed reduction and this has been discounted without clear reasoning for this section.
- 3.1.3 SJC note that the largest single site affected by N deposition is Shorne and Ashenbank Woods SSSI. LTC do not propose to mitigate or compensate for the effects at this location in situ, requiring compensation to be provided further away from the highway network and accepting major adverse effects at any sensitive site in close proximity to the highway.
- 3.1.4 Compensatory measures are discounted under Section 7.3.5 et seq of the PAQAP. Part of the stated reasoning is that it is unlikely that suitable measures could be designed for every significantly affected site which are sufficiently additional (para 7.3.19 of PAQAP). SJC consider that this has not been properly demonstrated.
- 3.1.5 LTC accept that measures such as removing biomass or fencing to reduce disturbance would be one-off measures, but that these would have longer term benefits and be considered as resilient and sustainable in perpetuity if the measures were committed to on an ongoing basis (see para 7.3.19 of PAQAP).
- 3.1.6 The management measures described at 7.3.9 and 7.3.10 of the PAQAP would have considerable benefits at the sites affected which LTC discounts with limited justification. They prefer to take no action to provide compensation or mitigation and to compulsorily acquire productive Grade 2 agricultural land with naturally high nitrogen composition, which has not been shown to be suitable for the type of species LTC seeks to compensate for (noting that LTC has not indicated in the PAQAP what these species are).
- 3.1.7 LTC appear to have also ruled out the possibility of any speed restriction on this section of the highway. Table 6.173 of Appendix 8.14 (Part 1 of 4) indicates that Operation - Ndep Base/DM/DS (max for site) kg N/ha/yr is 51.96 in the base, 47.9 in the Do Minimum and 49.55 in the DoSomething. SJC notes that the future Do Something with the scheme is lower than the existing base

case, **without any mitigation**. LTC suggest that it would be more than 15 years before the nitrogen deposition from the proposed LTC would reduce to DM levels. It is not clear how this has been assessed. But if the future position is a reduction with the scheme compared with today, this is still an improvement. In its own right this could reasonably be taken to mean that no compensation or mitigation is required and LTC's whole case for acquiring SJC land is unfounded.

- 3.1.8 In its application, LTC does not say what the nitrogen content of SJC's land is nor how it would remove the naturally high nitrogen levels in soils as part of the habitat creation measures, so that suitable conditions are created for habitat establishment. If it is able to do this on agricultural land only by compulsorily acquiring the land, this case has not been made in the application and it is unclear why it can not do this on land adjacent to the ARN. SJC has previously requested an appropriate level of detail for SJC to understand what LTC proposes to do with the land. LTC has not provided this, leaving SJC in a difficult position to negotiate with LTC and unable to understand whether the acquisition of its land is compelling in the public interest or to accept this.

3.2 Duration & Term

- 3.2.1 SJC are not convinced that land is required permanently in perpetuity for compensation of nitrogen deposition as this will reduce over time due to increasing reductions in the use of fossil fuelled vehicles. SJC cannot see how this reduction has been considered within the assessments, or whether it has been considered at all beyond 2030. We have already explained how the temporary effects can be mitigated.

3.3 oLEMP

- 3.3.1 SJC notes that the outline Landscape and Ecology Management Plan (oLEMP) are in outline only which makes it extremely difficult for SJC to be advised on whether the Applicant's proposals are acceptable, necessary or justified. Without the detail to substantiate this there can be only limited confidence that its objectives are achievable. LTC have not therefore satisfied the test required for the compulsory acquisition of land.

3.4 Ancient Woodland Compensation (plots 10-01, 11-72 and 11-77)

Land Use Justification

- 3.4.1 SJC consider the Applicant's justification for plots 10-01, 11-72 and 11-77 for the creation of a site for ancient woodland planting has not been fully explained, nor has it been set out what alternatives were considered. SJC

seeks assurance that there has been no double counting of the effect of Ndeposition together with the direct loss of ancient woodland and also that the soil types of the high quality agricultural land of each grade in the plots that it owns and which are productively farmed are suitable for this purpose and are the only suitable alternatives available, by direct reference to the alternatives that were considered.

3.5 Alternative Design and Relief Sought

- 3.5.1 SJC suggest an alternative way of managing the land going forwards that a) achieves the habitat connectivity that the Applicant is seeking, b) reduces nitrogen inputs to the land and c) retains Grade 2 farmland in sustainable production in the future.
- 3.5.2 This has been focused on land within SJC's ownership, although we note from aerial photography and local knowledge, that there are other smaller, less viable fields for agriculture, that look at least as suitable for these purposes in the surrounding area to both the north and the south of the route and we have prepared Figure 3 to demonstrate this.
- 3.5.3 In essence, SJC's proposals are to plant, close gaps and strengthen hedgerows, provide regenerative field margins to improve biodiversity and habitat corridors, and to reduce artificial fertiliser inputs to this land through regenerative farming techniques. This will improve the soil structure and retain it for future generations, contributing to food security. Please refer to the Figure 2 appended.
- 3.5.4 SJC notes LTC's desire to plant 70% of the land with trees, and would suggest that this should not be done on prime agricultural land if there is a reasonable alternative. We would also request evidence of where this has been done successfully elsewhere, how this would be monitored and what would happen if it fails. SJC considers that its alternative would achieve the same objective in terms of connectivity with less land and considers that LTC's objective of the same quantum of land is an unnecessary one, if the primary objective is achieved.

4 Conclusion

4.1.1 SJC invites the ExA to require a response from LTC to the points raised in this submission, including but not limited to:

- An explanation as to why TROs or speed limits have not been employed to control the effects of N deposition, particularly along the Shorne Woods section of the route.
- An explanation as to what it is that the quantum of land that LTC seeks to acquire achieves as distinct from the object of connectivity.
- An explanation as to why the scheme encourages a significant increase in traffic along Halfpence Lane, which is not controlled or mitigated and leads to the need for the compulsory acquisition of land elsewhere, together with the clarification of the absolute level of nitrogen deposition at this location.
- An active management plan for existing national and international designated land that sits within the order limits that seeks to mitigate or compensate for the activities that affect this, including Ndeposition from the ARN, fencing to limit access to people, dogs and deer and long term monitoring of the effects.
- A clause that makes compulsory acquisition of land subject to further evidence that it is suitable for the purpose.
- A clause that makes compulsory purchase of land for the compensation of these effects subjects demonstrating that suitable active management to existing national and international designated land is unsuccessful and that evidence of effects from Ndeposition can be seen.
- Subject to the above an agreement to continue discussions with SJC on the voluntary acquisition of some or part of SJC's land that achieves the objective of connectivity but not quantum, on a voluntary basis.

Appendix A Glossary




Term	Abbreviation	Explanation
The Master, Fellows and Scholars of the College of Saint John the Evangelist in the University of Cambridge	SJC	Known as Saint John's College
Project Air Quality Action Plan	PAQAP	The section of the air quality assessment where the proposed viable mitigation measures are set out and assessed.
Environmental Statement	ES	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.
Outline Landscape and Ecology Management Plan	oLEMP	A document which outlines the proposed management of the landscape and ecological elements of the A122 Lower Thames Crossing.
Site of Special Scientific Interest	SSSI	A conservation designation denoting an area of particular ecological or geological importance.

Appendix B Figures

Figure 1: Areas of Land that LTC has included that should have been discounted or avoided

Legend

Land classification type

-  Incorrectly included within the nitrogen affected areas classification
-  Excluded from the nitrogen affected areas classification
-  Operation - nitrogen affected area (increase of 0.4kg N/ha/yr)

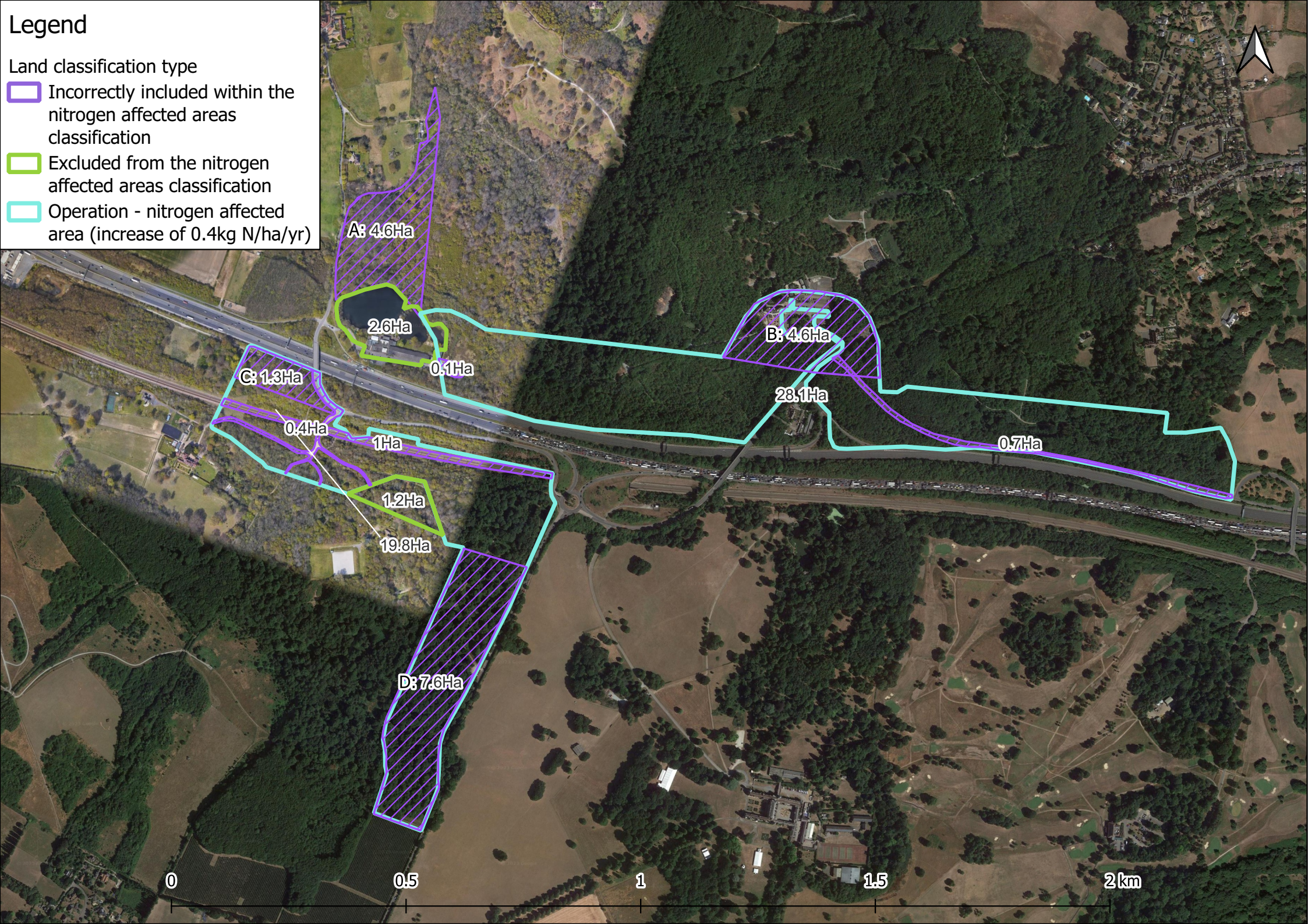
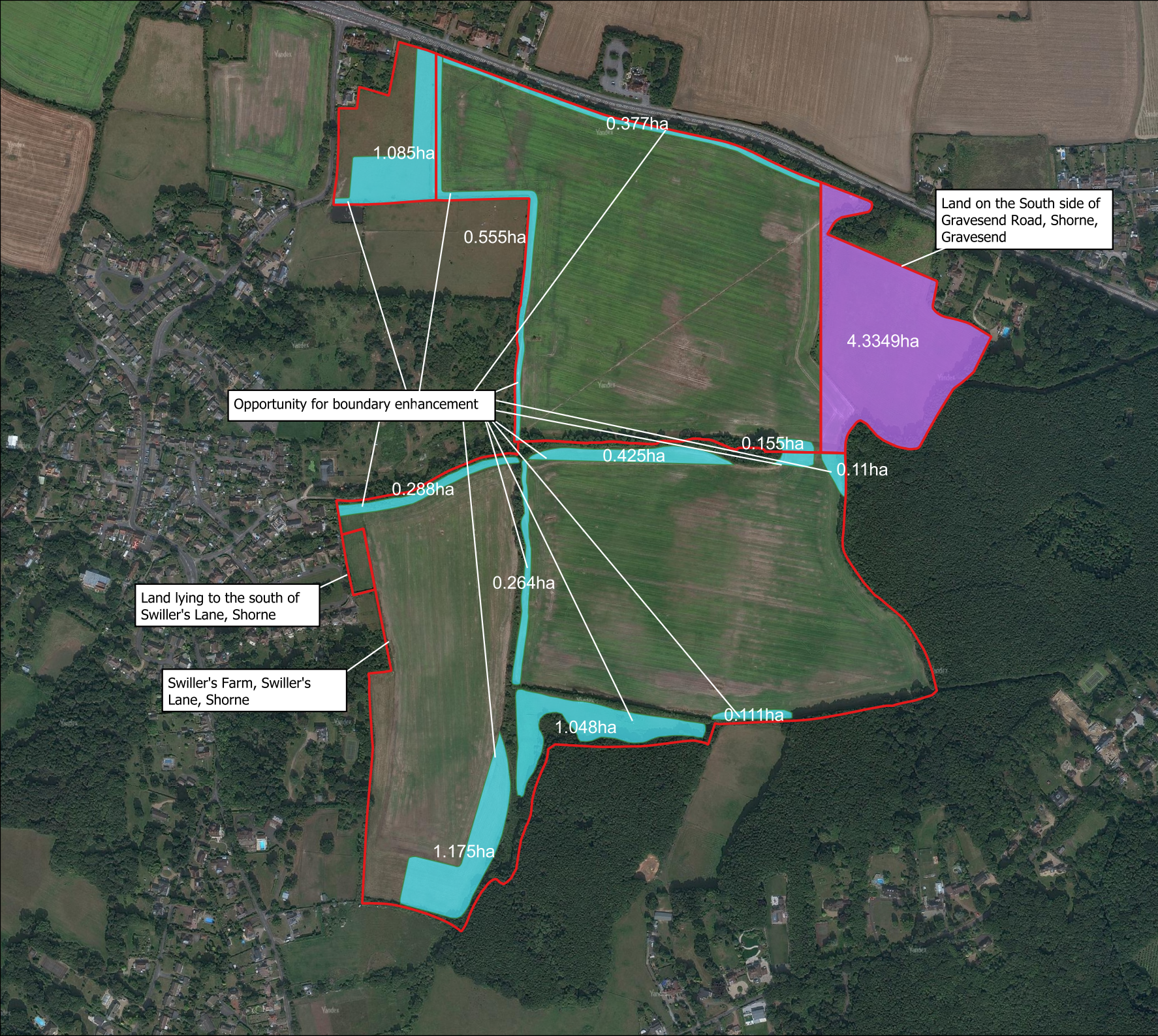


Figure 2: SJC Alternative Design

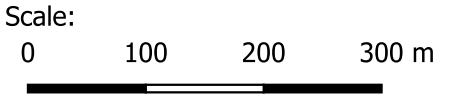


Map Showing Land Under Cambridge St Johns Ownership to the east of Shorne, Kent.

Identifying Land for Field Boundary Enhancement and Hedgerow Development.

Legend

- Cambridge St Johns Ownership
- Potential Land Parcels for Boundary Enhancement
- Whole Parcel of Land for Rewilding



Borders on all fields are suitable for enhancement to improve connectivity between existing hedgerows.

The complete parcel of land on the south side of Gravesend Road, Shorne could be fully rewilded to improve biodiversity.

Smaller parcels of land in fields within the study area have been identified for rewilding and/or border enhancement to improve existing nature corridors and biodiversity, including habitat for pollinators.

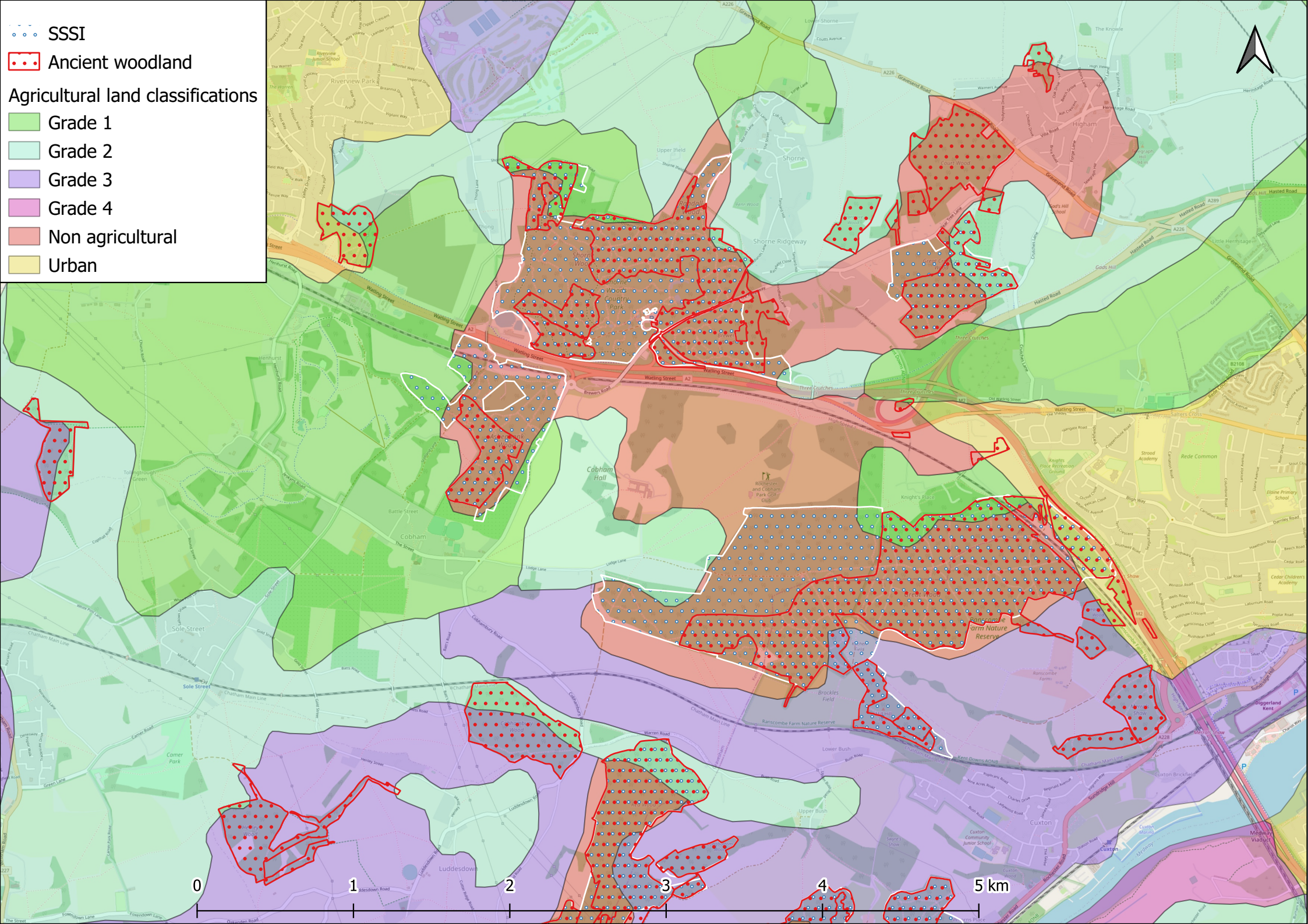
Total land for rewilding: 4.3349ha
 Total land for border development: 5.593ha
 Total land: 9.9279ha

Date: 07/07/2023
 Author: MM

Savills Brighton
 Mocatta House
 Trafalgar House
 BN1 4DU



Figure 3: SJC Alternative Sites



- SSSI
- Ancient woodland
- Agricultural land classifications
- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Non agricultural
- Urban

0 1 2 3 4 5 km

