

# Lower Thames Crossing

## 5.4.5.4 Final Agreed Statement of Common Ground between (1) National Highways and (2) Shorne Parish Council (Clean version)

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## Revision history

Version	Date	Submitted at
1.0	31 October 2022	DCO Application
2.0	19 September 2023	Deadline 4
3.0	31 October 2023	Deadline 6
4.0	15 December 2023	Deadline 9A

## Status of the Statement of Common Ground

This is the Final Agreed Statement of Common Ground between (1) National Highways (the Applicant) and (2) Shorne Parish Council.

Both parties have reached agreement on the position on the status of all 122 matters. Of the 122 matters contained within, 11 matters are agreed and 111 are not agreed, leaving no matters outstanding.

### On behalf of the Applicant

Name	[REDACTED]
Position	[REDACTED]
Organisation	National Highways
Signature	[REDACTED]

### On behalf of Shorne Parish Council

Name	[REDACTED]
Position	[REDACTED]
Organisation	Shorne Parish Council
Signature	[REDACTED]

## Lower Thames Crossing

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# 1 Introduction

## 1.1 Purpose of the Statement of Common Ground

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the Development Consent Order (DCO) application for the proposed A122 Lower Thames Crossing (the Project) made by National Highways Limited (the Applicant) to the Secretary of State for Transport (Secretary of State) under section 37 of the Planning Act 2008 on 31 October 2022.
- 1.1.2 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the Applicant and Shorne Parish Council, and where agreement has not been reached.
- 1.1.3 This final version of the SoCG has been submitted at Examination Deadline 9A.

## 1.2 Principal Areas of Disagreement

- 1.2.1 On the 19 December 2022 the Examining Authority made some early procedural decisions to assist the Applicant, potential Interested Parties and themselves to prepare for the Examination of the Application.
- 1.2.2 One such procedural decision requested that a tracker recording Principal Areas of Disagreement in Summary (PADS) should be used.
- 1.2.3 The PADS tracker would provide a record of those principal matters of disagreement emerging from the SoCG and should be updated alongside the SoCG as appropriate throughout the Examination with the expectation that a revised PADS Tracker should be submitted at every Examination deadline.
- 1.2.4 This SoCG should be read in conjunction with the Shorne Parish Council PADS Tracker [\[AS-079\]](#) published 16 March 2023. No other PADS have been submitted by Shorne Parish Council since this submission.

## 1.3 Terminology

- 1.3.1 In the final position on matters table in Section 2 of this SoCG, “Matter not agreed” indicates agreement on the matter could not be reached following significant engagement. “Matter agreed” indicates where the issue has now been resolved.

## 2 Matters

### 2.1 Final position on matters

- 2.1.1 A summary of engagement undertaken between the Applicant and Shorne Parish Council is summarised in Table A.1 in Appendix A.
- 2.1.2 The outcome of this engagement is presented in Table 2.1 which details and presents the matters that are either agreed or not agreed between the Applicant and Shorne Parish Council.
- 2.1.3 In the column 'Item No' in Table A.1, 'RRE' indicates an existing SoCG matter that was also raised in the Relevant Representation and 'DLX' indicates a new matter added during Examination at/around that deadline
- 2.1.4 Since version 3 of this SoCG was submitted at Deadline 6, 10 additional matters have been added as follows:
- a. 2.1.113 (Design – Road, Tunnels, Utilities)
  - b. 2.1.114 (Construction)
  - c. 2.1.115 (Construction)
  - d. 2.1.116 (Operation & Maintenance)
  - e. 2.1.117 (Operation & Maintenance)
  - f. 2.1.118 (Wider Network Impacts)
  - g. 2.1.119 (Cultural heritage)
  - h. 2.1.120 (Population and human health)
  - i. 2.1.121 (Population and human health)
  - j. 2.1.122 (Road drainage and the water environment)
- 2.1.5 The following matters have moved from 'Matter Under Discussion' to 'Matter Not Agreed':
- a. 2.1.113 (Design – Road, Tunnels, Utilities)
  - b. 2.1.40 (Construction)
  - c. 2.1.43 (Construction)
  - d. 2.1.44 (Construction)
  - e. 2.1.49 (Construction)
  - f. 2.1.110 (Construction)
  - g. 2.1.114 (Construction)

- h. 2.1.115 (Construction)
- i. 2.1.111 (Operation & Maintenance)
- j. 2.1.112 (Operation & Maintenance)
- k. 2.1.116 (Operation & Maintenance)
- l. 2.1.117 (Operation & Maintenance)
- m. 2.1.118 (Wider Network Impacts)
- n. 2.1.73 (Air quality)
- o. 2.1.85 (Landscape and visual)
- p. 2.1.87 (Landscape and visual)
- q. 2.1.90 (Terrestrial biodiversity)
- r. 2.1.120 (Population and human health)
- s. 2.1.121 (Population and human health)
- t. 2.1.103 (Road drainage and the water environment)
- u. 2.1.104 (Road drainage and the water environment)
- v. 2.1.105 (Road drainage and the water environment)
- w. 2.1.106 (Road drainage and the water environment)
- x. 2.1.109 (Road drainage and the water environment)
- y. 2.1.122 (Road drainage and the water environment)
- z. 2.1.107 (Climate)

2.1.6 The following matters have moved from ‘Matter Under Discussion’ to ‘Matter Agreed’:

- a. 2.1.34 (Design – Road, Tunnels, Utilities)
- b. 2.1.119 (Cultural heritage)
- c. 2.1.91 (Marine biodiversity)
- d. 2.1.102 (Road drainage and the water environment)

2.1.7 At Examination Deadline 9A, there are 122 matters in total, of which 11 are agreed and 111 are not agreed.

2.1.8 This is the final Statement of Common Ground between the Applicant and Shorne Parish Council.

**Table 2.1 Final position on Matters**

Topic	Item No.	Shorne Parish Council Comment	The Applicant’s Response	Application Document Reference	Status
<b>Need for the Project</b>					
Scheme Objectives	2.1.1  RRE	<p>Objectives need review - do not match or address actual problems: The principal problem at the Dartford Crossing is south-to-north traffic volume and flow, queuing and consequent pollution yet very little, and only temporary, relief will actually be delivered by the Project. Improving flow in that direction is inexplicably not an objective of the Project.</p> <p>The Project does not directly help the most deprived areas in North Kent (Grain and Sheppey).</p> <p>Objectives appear to be selected to ensure “Option C” was chosen rather than according to overall transport needs.</p>	<p>The Scheme Objectives were agreed through extensive discussions with the Department for Transport (DfT) and outline what the Project should achieve. The objectives are:</p> <ol style="list-style-type: none"> <li>1. To support sustainable local development and regional economic growth in the medium to long term.</li> <li>2. To be affordable to government and users.</li> <li>3. To achieve value for money.</li> <li>4. To minimise adverse impacts on health and the environment.</li> <li>5. To relieve the congested Dartford Crossing and approach roads, and improve their performance by providing free-flowing, north-south capacity.</li> <li>6. To improve resilience of the Thames crossings and the major road network.</li> <li>7. To improve safety.</li> </ol> <p>While objectives (5) and (6) do not specifically refer to the south to north capacity, reduction in congestion at the Dartford Crossing and its approach roads, a reduction in journey time and improvements in resilience and connectivity alongside</p>	Need for the Project <a href="#">[APP-494]</a>	Matter Not Agreed



Topic	Item No.	Shorne Parish Council Comment	The Applicant’s Response	Application Document Reference	Status
			<p>benefits to both the local and regional economy, are the principal benefits which would be delivered through the Project. The ‘Need for the Project’ sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project. The Project is predicted to result in a significant reduction in traffic flow at the Dartford Crossing, which will also lead to an improvement in air quality at that location.</p> <p>As well as the objectives above, the Project is being developed in line with the National Policy Statement for National Networks, which sets out government policies for Nationally Significant Infrastructure Projects for England.</p>		
Scheme Objectives	2.1.2  RRE	Objectives conflate different aims: The Project was originally “sold” as being about improvements at Dartford but discussion has morphed into being about economic improvement. The immediate area around the crossing in the south however receives no benefits only deteriorations.	<p>The Project is expected to deliver a range of benefits including congestion relief at the Dartford Crossing. The improved connectivity across the River Thames and reduced journey times would help local businesses to boost productivity, supporting sustainable local development and regional economic growth.</p> <p>For more information about the Scheme Objectives and economic benefits, see the Need for the Project; the Combined Modelling Appraisal Report Appendix D:</p>	<p>Need for the Project  <a href="#">[APP-494]</a></p> <p>Combined Modelling and Appraisal Report Appendix D: Economic Appraisal</p>	Matter Not Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			Economic Appraisal Package; the Environmental Statement (ES); and the Planning Statement.	Package [APP-524 to APP-527]  Planning Statement [Document Reference 7.2 (2)]	
Cost of the Project	2.1.3  RRE	Question whether the Project is affordable and represents value for money: Estimated costs have so far increased by 50% to over £8billion and no doubt still rising, while also omitting other required enabling costs such as improvements to the A229 and its junctions with the M2 and M20. There will also be other consequential costs either not presently included or identified post opening, these should all be considered in the financial evaluation.	The Appraisal Summary Table Report within the Economic Appraisal Package (EAP) in Appendix D of the Combined Modelling Appraisal Report summarises the Project's cost and benefits, while the Economic Appraisal Report provides more information about the appraisal methods and results.	Combined Modelling and Appraisal Report – Appendix D - Economic Appraisal Package – Appraisal Summary Table Report [APP-524]	Matter Not Agreed
Scheme Objectives	2.1.4	Project will not deliver adequate improvement at Dartford, especially for the projected cost: Another bridge is anyway needed at the Dartford Crossing, possibly	Since the Preferred Route Announcement in 2017, the Applicant has reappraised its routing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location.	Need for the Project [APP-494]	Matter Not Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant’s Response	Application Document Reference	Status
		together with the “A14” long tunnel option bypassing Dartford.	The Need for the Project sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project.		
Scheme Objectives	2.1.5  RRE	<p>Improving resilience of the Thames Crossings is a major objective but has not been discussed so far: Apart from one Figure in the very first consultation, which showed only a “least worst” scenario, there has not been any discussion about how the Project could and will provide resilience to the Dartford Crossing, especially without gridlocking the whole of north-west Kent in the process.</p> <p>All possible scenarios need to be considered, modelled and published.</p> <p>How resilience will be provided is extremely unclear, enabling works would be needed especially for the south-north direction (e.g., at M25 J2 northbound to A2 eastbound which needs to be free-flowing, and others) but are not included in the Project.</p>	<p>The Need for the Project sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project. The document also provides further details on the Lower Thames Crossing as an alternative route: The Project would provide an alternative route to the Dartford Crossing for local and strategic traffic wishing to cross the river east of London. This would give people more choice when deciding how they want to cross the river east of London but would also provide an alternative in the case of major incidents or closures at the other River Thames crossings.’</p> <p>As with the wider strategic road network, the Project will be patrolled by Traffic Officers and managed through the Regional Operations Centre (ROC) at Godstone in Surrey. In the event of an incident occurring on the strategic road network the ROC will liaise with the various emergency services, Traffic Officers, the Applicant’s network</p>	<p>Need for the Project  <a href="#">[APP-494]</a></p> <p>Comments on WRs Appendix G – Parish Council, Organisations and Groups  <a href="#">[REP2-052]</a></p>	Matter Not Agreed

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		<p>SPC Update 31/8/23: Prior to the addition shown we commented that "The answer does not provide any more information about the practical implementation or operational function of the Resilience Objective."</p> <p>The response has been expanded but is still not covering the aspect of what routes diverting traffic will take to reach the A122 from the southern M25 when notified that there is a problem at or in reaching the Dartford Crossing. Gantry signs may tell drivers to use the A122 instead.</p> <p>This was covered better in the Applicant's response to TCAG on page 156-157 of REP2-052, as then discussed on pages 12-14 of our response submission REP3-201, at Examination Deadline 3.</p>	<p>maintainers and other network authorities including Transport for London to ensure that any delays are kept to a minimum and that incidents are cleared within the Applicant's response times. In addition, Variable Message Signs will advise motorists of traffic conditions so that they can adjust their journeys to suit.</p> <p>The Project is predicted to result in a significant reduction in traffic flow at the Dartford Crossing, which will also lead to an improvement in air quality at that location.</p>		
Scheme Objectives	2.1.6	Project needs reality checks: The Project seems to have developed a life of its own without being sufficiently connected to the reality of existing and predicted traffic levels in north-west Kent, which the Project will worsen, or	The 'Need for the Project' sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the Project.	Need for the Project <a href="#">[APP-494]</a>	Matter Not Agreed

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		the actual problems that need a solution. Need to consider what success will look like, and the opposite, which outcomes are the Project delivering.			
<b>Route selection, modal alternatives &amp; assessment of reasonable alternatives</b>					
Route Selection	2.1.7  RRE	The sequential approach discarded potentially better options from proper reconsideration: Options “D” and “E” were discarded early on but principally over the cost and difficulty of a bridge structure. Once a “tunnel only” solution had been decided, all the options should have been reconsidered in that format, also including include a hybrid between options D and E connected to M2 J5 (currently being massively reconfigured).	Since the Preferred Route Announcement in 2017, the Applicant has reappraised its routeing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location.  The ‘Need for the Project’ sets out how the identification, selection and design process has responded to the Project’s objectives and how a collaborative engagement process has been used to inform the Project.	Need for the Project <a href="#">[APP-494]</a>	Matter Not Agreed
Route Selection	2.1.8  RRE	An up-to-date reappraisal should be published with the DCO: There needs to be assurance that “Option C” remains the best and best value, most viable route.	Since the Preferred Route Announcement in 2017, the Applicant has reappraised its routeing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible location.  The ‘Need for the Project’ sets out how the identification, selection and design process	Need for the Project <a href="#">[APP-494]</a>	Matter Not Agreed

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			has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the Project.		
Route Selection	2.1.9  RRE	Crossings implementation should have started furthest east: If the objectives are reviewed looking at which the Project can and can’t deliver, it becomes obvious that there is little point (and there is economic disbenefit) to bringing strategic traffic past the Medway Towns via the M2 when it could have crossed the Thames much further east. The Scheme objectives refer to sustainable development.	The Scheme Objectives were agreed through extensive discussions with the DfT and outline what the Project should achieve. The ‘Need for the Project’ sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the Project.	Need for the Project <a href="#">[APP-494]</a>	Matter Not Agreed

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<b>Consultation and engagement</b>					
<b>Adequacy of Consultation</b>  Number of Consultations	2.1.10  RRE	<p>Too many Consultations: There have been six Consultations since 2017, it has been very difficult to read all the documents and respond.</p> <p>Often information provided, and therefore comments that had to be made were very similar, other times there were very large differences.</p> <p>Changes were not highlighted so every word had to be read again to detect differences.</p>	<p>The five consultations that have taken place since 2017 have been beneficial to ensure the public and stakeholders have had opportunities to provide feedback on what is a large and complex project as it has developed over time. Development of a project of this scale is an iterative process. As the design develops and is taken to consultation, feedback leads to a need to modify the proposals, and some of these modifications require further consultation. It is normal for a project of this size to hold a series of consultations.</p> <p>As the Applicant developed each consultation, careful checks were undertaken to make sure that the changes from the previously consulted proposals were highlighted, but also that the full nature of the proposals following the changes remained clear.</p> <p>The Applicant undertook the Community Impacts Consultation to directly address concerns raised by local authorities, including Gravesham Borough Council, that further consultation was required prior to submission of the DCO application.</p>	Consultation Report [ <a href="#">APP-064</a> to <a href="#">APP-069</a> ]	Matter Not Agreed
<b>Consultation information</b>	2.1.11	Consultation documents had varied availability and ease of access: Getting hold of the	The Applicant has developed the consultation materials in a way that is designed to help the public access	Consultation Report [ <a href="#">APP-</a>	Matter Not Agreed

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Consultation documents		<p>documents was sometimes difficult and they were not easy to access or view. Cross referencing is extremely difficult as is finding references indicated in National Highways responses.</p> <p>SPC Final Update: The response is more about point 2.1.15, but we disagree that responses were provided to all stakeholders. The point is that other IP's would not have known that we had made particular comments when they were not featured or formally discussed/responded to.</p>	<p>information at the level required. The consultation guides provided an entry point from which people could read in greater detail in the areas that were of particular concern. The Applicant acknowledges that due to the volume and quality of the consultation responses received, the volume of information provided, particularly in the <i>You Said, We Did</i> document, was large. However, it was important to provide responses to all stakeholders. The Applicant worked carefully on the referencing to try and make access into the documentation as straightforward as possible.</p>	<p><a href="#">064 to APP-069</a>]</p>	
<p><b>Consultation information</b></p> <p>Consultation presentation</p>	<p>2.1.12</p> <p>RRE</p>	<p>Data not updated, re-presentation misleading: Old data was presented again in different formats rather than the later Consultations containing new/updated data. By altering the formats the false impression was given that that there was new information being published.</p>	<p>During the Community Impacts Consultation, data from the withdrawn DCO submission was used to set out the environmental impacts associated with the operation of the Project. The Applicant applied a simplification to this data to make it more understandable for the public. This was the first time this data had been shared in a public way. The Applicant recognises that because some stakeholders, including Shorne Parish Council, had received the ES that was prepared as part of the withdrawn DCO submission in 2020, they had already seen this data, however there was no intent to mislead, and the data is considered to be</p>	<p>N/A</p>	<p>Matter Not Agreed</p>



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			suitably representative of the forecast impacts of the Project.		
<p><b>Adequacy of Consultation</b></p> <p>Consultation Promotion</p>	<p>2.1.13</p> <p>RRE</p>	<p>Publicizing varied greatly, and therefore affected the number and nature of responses elicited, impact of consultation fatigue: The first Consultation was e-mailed to the entire Dart Charge e-mail list, this skewed both quantity and quality of the responses, whether they looked at the full documentation or just believed the headlines. Subsequently the number of responses has fallen to very low numbers (only 1206 in July 2021), although overall quality of responses may therefore be higher.</p> <p>SPC Final update: Apologies for confusion due to so many Consultations and Reports close together, we meant to reference the May 2022 Local Refinement Consultation. For that there were 2297 total responses of which "more than 60%" were from a campaign (not usually counted individually) by Woodland Trust.</p>	<p>At the start of the Statutory Consultation the Applicant used the Dart Charge email to notify customers of the Dartford Crossing. One of the objectives of this consultation was to gather information on the need for the Project and impacts on road users, and as one Project objective is to relieve the congested Dartford Crossing and approach roads, the Applicant considered it appropriate to consult the customers. The Applicant then also used this channel for the Community Impacts Consultation in July 2021 (responses actually totalled 3,218), again to understand the impacts on customers.</p> <p>At each consultation the Applicant has reviewed each response on its own merits, to understand the individual concern. While the Dart Charge emails did likely lead to a significant increase in the responses, this did not lead to a reduction in the level of consideration given to a local respondent.</p>	<p>Consultation Report [<a href="#">APP-064</a> to <a href="#">APP-069</a>]</p>	<p>Matter Not Agreed</p>

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Consultation Information	2.1.14  RRE	<p>Misleading Consultation information: The first Consultation showed a two lane tunnel, no other structures, a very small A2 junction footprint, narrow emergency access, no side feeder roads etc – these and other aspects were then superseded by very different and greatly expanded proposals. These omissions would have misled responders about the true impact.</p> <p>SPC Final Update: It was a Consultation seeking opinions from the public, therefore our comment was about the public being misled.</p>	<p>The Route Consultation in 2016 was for a tunnel with two lanes. This consultation set out a series of route options for consideration and resulted in the Secretary of State selecting the current proposed route in 2017. This consultation was undertaken at a relatively early stage of design, when it was considered that only two lanes would be required to meet the Scheme Objectives, and all routes were presented on a similar basis (i.e. all routes were represented as two lanes in each direction). Following the selection of the route, the design and traffic modelling were developed further, and it was identified that three lanes were required. This was reflected in the proposals set out in the Statutory Consultation in 2018, and in consultations after that. Prior to the Statutory Consultation in 2018, a review was undertaken to consider the changes that had been made to the Project, including the changes both to the connection between the Project and the A2, and the increase from two to three lanes. This review found that the increased scale of the Project (noting that similar modifications would have been needed at other locations) would not have led to the Secretary of State making a different decision in 2017.</p>	<p>Consultation Report [<a href="#">APP-064</a> to <a href="#">APP-069</a>]</p>	<p>Matter Not Agreed</p>

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<p><b>Responses</b></p> <p>Consultation Responses</p>	2.1.15	<p>Not all concerns raised are addressed or given a public response: Some concerns that have been raised by many responders are not addressed or receiving a response. Response documents discuss the most frequently raised concerns but there could be important points raised by only one person, these should be included rather than being edited out and hidden/ignored.</p> <p>Responses in response documents are often repetitive pasting and not truly answering the point raised, they can come over as dismissive of valid concerns.</p>	<p>Due to the volume of consultation responses (28,493) provided at Statutory Consultation, it was not practical to provide a response to each individual response. Instead, a process of coding the responses to provide a single response to multiple issues was undertaken. This approach is set out in the Consultation Report, and an earlier version of the report was provided to Shorne Borough Council for consideration. This process informed the preparation of the <i>You Said, We Did</i> document, as well as the consultation report. This approach is commonly used for projects of this scale, and aligns with guidance.</p>	<p>Consultation Report <a href="#">[APP-064 to APP-069]</a></p>	Matter Not Agreed
<p><b>Consultation information</b></p> <p>“Ward summary” presentation</p>	2.1.16	<p>“Ward summary” presentation disguised disbenefits: Some data was presented in Ward Summaries, this had some benefits but also disbenefits for the largest Ward south of the river Thames (Shorne, Cobham and Luddesdown) because it is so large, stretching from the middle of the Thames to the southernmost parts of Gravesham, and the impacts vary</p>	<p>The decision to use ward boundaries to present the Project’s impacts was discussed with local authorities before consultation and the Applicant considered feedback on the approach and the ward selection at that time.</p> <p>While drafting the ward summary chapters, the Applicant accounted for the fact that some wards were larger than others and that some were more heavily impacted than others. The Applicant tailored the</p>	<p>Consultation Report <a href="#">[APP-064 to APP-069]</a></p>	Matter Not Agreed

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		<p>greatly within its area, being greater north of the A2 than to its south.</p> <p>For future publications the ward should be split along the A2 into north and south sections.</p> <p>SPC note July 2022 – The warding arrangements were changed in the recent Electoral Boundary Review, Shorne is now combined into a Ward with Higham. So future publications should consider Shorne and Higham separately.</p> <p>SPC Final Update: The issue is about reporting averaged impacts within the wards/chapters as lower impact areas disguise the magnitude of effect on high impact areas.</p>	<p>information in each ward to the size and level of impacts, and some wards with fewer or similar impacts were presented together in a joint chapter. Larger and more heavily impacted wards were presented with one ward per chapter. Shorne, Cobham and Luddesdown ward was one of the largest wards featured in the document and the Applicant provided more information in its chapter, ensuring that the content was proportionate to the impacts. For example, the Shorne, Cobham and Luddesdown chapter was 94 pages long, with more information about the northern section of the ward that would be most affected by the Project. Nearby Higham ward was covered in 58 pages because it covers a smaller area and would be impacted by the Project to a lesser extent.</p> <p>Overall, the Applicant believes its Ward Impact Summaries document has provided consultees with a proportionate amount of information about the areas that would be affected by the construction and operation of the Project.</p>		
<p><b>Consultation</b></p> <p>Information Provision</p>	<p>2.1.17</p> <p>RRE</p>	<p>Withheld or “Confidential” information provision: Not all information that we needed/requested was provided to the Parish Council, this is very frustrating and still ongoing.</p>	<p>The Applicant has provided detailed information to Shorne Parish Council. To supplement the information provided during the public consultations, the Applicant has provided the withdrawn DCO application documents, which included full</p>	<p>N/A</p>	<p>Matter Not Agreed</p>

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		Updated traffic data in particular has been provided to Gravesham Borough Council and Kent County Council under a Confidentiality agreement but not to the Parish Council. National Highways say that Gravesham Borough Council can provide it to us but GBC consider that they cannot.	documentation of the traffic model. The Applicant takes a proportionate approach to the sharing of information and has worked with local planning authorities and highways authorities to make sure these have access to the latest data sets. Nevertheless, the data provided to Shorne Parish Council is considered to be representative for the purposes of understanding the impacts, both adverse and beneficial, of the Project.		
<b>Consultation</b>  Route Design changes	2.1.18  RRE	Decision making processes are opaque: Aspects of the proposals change without us being able to understand why, this is sometimes connected to Statutory bodies such as Natural England, Areas of Outstanding National Beauty (ANOB) – “stakeholders” who do not consult or communicate with residents and Parish Councils but influence the plans from afar without having or seeking any local knowledge. National Highways give these non-representative organisations too great a weight.	The Applicant works hard to balance the concerns of all stakeholders in making decisions relating to the Project. The framework for consideration is set out in the National Policy Statement for National Networks (DfT, 2014), which sets out how certain aspects, such as impacts on AONB, impacts on Green Belt, and environmental impacts such as noise and air pollution, should be considered. This needs to be factored into the decision making, and at times leads to certain statutory bodies which are tasked with protecting specific designations or assets, being given additional weight.	N/A	Matter Not Agreed
<b>Collaboration</b>	2.1.19	Too much working is isolation by Local Authorities: The different local authorities have different responsibilities but their inputs	The Applicant cannot determine how local authorities choose to work. The Applicant has set up a number of joint sessions with	Localised Traffic Modelling <a href="#">[REP6A-004]</a>	Matter Not Agreed

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Collaboration of the Project with Local Authorities		<p>into planning also overlap. While it is good if several responses say the same thing independently of each other, given the enormous size and consequences of the project it would be better if there was a requirement and facilitation to collaborate between local authorities working together and including SPC.</p> <p>SPC update: This point originally related to matters prior to the DCO however the problems are continuing along with on-going local modelling.</p> <p>It is true that NH can’t influence collaborative working positively but this is not taking place in a free environment but one that has been constrained by NH. NH have influenced collaboration negatively through having secrecy agreements over data provision.</p> <p>We continue to object to this approach by/attitude from NH.</p> <p>As data inputs from traffic surveys are factual, observational matters we see no reason why they should be kept secret. The same applies to the “Cordons” from</p>	<p>the local authorities but cannot influence how they work together.</p> <p>Following discussions during Issue Specific Hearing 1, it was requested that the Applicant provide a document describing the criteria used to determine how requests for local traffic modelling would be considered. The Applicant submitted this document, which is called Localised Traffic Modelling, at Deadline 1.</p>		

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		LTAM that have been supplied to various local authorities.			
<b>Documents &amp; Information</b>  Information event request	2.1.20	In 2017 SPC requested an additional information event to be held in Shorne West/Riverview.	In response to this request, the Applicant held an additional event for Riverview residents.	N/A	Matter Agreed
<b>Land and Compulsory acquisition</b>					
<b>Impacts</b>  Extent of order limits	2.1.21  RRE	Enormous land take: After expansion of the order limits and compensation/mitigation land needed, Shorne has about one third of its total area affected.  SPC Update: Factual matter therefore our opinion has not changed and cannot change unless/until the project gets cancelled.	Throughout the development of the Project, land use has been revised as the proposals have been progressed. Between Statutory Consultation in 2018 and Supplementary Consultation in March 2020, the Order Limits increased, largely due to additional land needed to divert utilities and the development of the proposals to establish natural habitat areas, including the planting of trees and vegetation. Following Supplementary Consultation, work continued with stakeholders, including utility companies, to refine the proposals and minimise the land needed. Consultation took place on the revised Order Limits (22.9km <sup>2</sup> across the whole Project) during Design Refinement Consultation in July 2020. This reduced the amount of land needed for the Project from that proposed at Supplementary Consultation (26km <sup>2</sup> ), while remaining above what was proposed at	Land Plans [Document Reference 2.2 (8)]  Statement of Reasons [Document Reference 4.1 (8)]  Need for the Project [APP-494]	Matter Not Agreed

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			<p>Statutory Consultation (21km<sup>2</sup>). At Community Impacts Consultation in July 2021 the Order Limits were reduced further to 22.2km<sup>2</sup>. At Local Refinement Consultation (May 2022) following engagement with stakeholders and refinements to the utility design, the Order Limits were further refined in certain areas and increased to 24.35km<sup>2</sup>.</p> <p>Land was added to include four habitat compensation areas including Shorne Woods. These sites are proposed to compensate for the potential effects from nitrogen caused by the forecast changes in traffic as a result of the Lower Thames Crossing.</p> <p>The land required for the Project is shown on the Land Plans and the reason each plot is required is explained in the Statement of Reasons. Reducing the impacts of the Project on the environment is one of the Project requirements (see the Need for the Project). At every step of the Project's lifecycle, consideration has been given and efforts have been made to reduce the environmental impacts, while still fulfilling the needs of the Project. The Applicant has followed the mitigation hierarchy of 'avoid, minimise, restore and compensate' to protect the environment in which it would be</p>		



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			situated and in keeping with industry best practice.		
<p><b>Planning and Policy</b></p> <p>Green Belt impact</p>	2.1.22	<p>The land that the crossing will take is Green Belt, what is supposed to be a strategic gap between built up areas and providing them with green recreational space and clean air. There should be a specific discussion about impact on Green Belt Land (as well as Ancient Woodland, SSSI’s, Special Protection Areas, Ramsar Site etc).</p> <p>SPC Update: Agree that Green Belt has been specifically discussed as the point requested however we do not agree with the assessment that damaging the Green Belt here is justified by “very special circumstances” or that the presumption against development can therefore be overturned.</p>	<p>The Project is located within the Green Belt and is considered to be inappropriate development as a whole. Linear Nationally Significant Infrastructure Projects often pass through designated Green Belt as recognised within the National Policy Statement for National Networks. The Applicant’s view is that there are very special circumstances for the Project as the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. Planning Statement Appendix E – Green Belt provides an assessment of the Project against green belt planning policy and was submitted in support of the DCO application.</p> <p>The Applicant’s position is that there has been a lengthy route selection process and many years of consultation throughout the development which has resulted in the least impactful solution for the Green Belt.</p> <p>The Applicant has demonstrated the overriding need for the Project and the benefits it will deliver (as set out in the Need for the Project) constitute to the very special circumstances necessary to override this policy position.</p>	<p>Planning Statement Green Belt Report Appendix E [Document Reference 7.2 Appendix E (2)]</p> <p>Need for the Project [APP-494]</p>	Matter Not Agreed

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<p><b>Land acquisition</b></p> <p>Order limits selection methods</p>	2.1.23	<p>Opacity of inclusion and exclusion of land from order limits: The method by which land is included/excluded is opaque and seems to have involved some negotiations which may not be in the interest of all local residents. E.g. if one piece of land is negotiated out, another person’s land may be taken, even if much more remotely from the Project. Effect of taking land that speculators would like to develop, sends problems elsewhere.</p>	<p>For any land within the Order Limits, the Applicant must be able to demonstrate its need, or function, and also evidence compliance with statute and policy guidance.</p> <p>Planning Act 2008 compulsory purchase guidance (Department of Communities and Local Government, 2013) states:  <i>“Section 122 of the Planning Act provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that:</i></p> <ul style="list-style-type: none"> <li>• <i>the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development..., and</i></li> <li>• <i>there is a compelling case in the public interest for the compulsory acquisition.</i></li> </ul> <p><i>Applicants must therefore be prepared to justify their proposals for the compulsory acquisition of any land to the satisfaction of the Secretary of State.”</i></p> <p>It goes on to say:  <i>“The applicant should be able to demonstrate to the satisfaction of the Secretary of State that all reasonable alternatives to compulsory acquisition (including modifications to the scheme) have been explored. The applicant will also</i></p>	N/A	Matter Not Agreed

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			<i>need to demonstrate that the proposed interference with the rights of those with an interest in the land is for a legitimate purpose, and that it is necessary and proportionate."</i>		
<b>Viability</b>  Loss of agricultural land	2.1.24	<p>Severance of land and farm viability, loss of productive farmland: Some proposals have rendered farms non-viable or taken the centre rather than the edge. Loss of productive farmland threatens food security and increase food miles.</p> <p>SPC Update: Explaining NH's reasons does not alter the impacts. This is largely a factual matter.</p> <p>References APP-148 and APP-302 have been reviewed but do not seem relevant to the point raised.</p> <p>SPC further update: land at Gads Hill Farm was removed from plans however impact on land farmed by DC Shearer remains significant.</p>	<p>Agricultural land impacts are provided in ES Chapter 10: Geology and Soils, which will be informed by information contained within Appendix 10.4 (Agricultural Land Classification).</p> <p>ES Chapter 10: Geology and Soils provides the assessment of the Project on agricultural land during construction and operation. ES Appendix 10.4 Agricultural Land Classification Factual Report sets out the quality of agricultural land within the Order Limits. ES figure 10.4 Agricultural Land Classification Mapping presents the results of the detailed agricultural land classification survey.</p>	<p>ES Chapter 10: Geology and Soils [<a href="#">APP-148</a>]</p> <p>ES Appendix 10.4: Agricultural Land Classification Factual Report [<b>Document Reference 6.2 ES Figure 10.4 (2)</b>]</p>	Matter Not Agreed
<b>Design – Road, Tunnels, Utilities</b>					
<b>Green bridges</b>	2.1.25	Width can always be greater, using a lot more cut and cover,	The green bridge carrying Thong Lane over the Project was widened as part of design	Appendix B of Design	Matter Not Agreed

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Green bridges, width and nature		<p>this would increase protection of nearby residents from noise, light and air pollution.</p> <p>Discrepant plan for Thong Lane green bridge not yet corrected.</p> <p>Question likelihood of anything being able to grow in the fumes from 18 lanes of tarmac.</p> <p>SPC Update: It was very interesting to see the opinions of other IP's through the WR's, they accord with our own opinions.</p> <p>SPC note the design discrepancy of Thong Lane North, south side has been corrected.</p>	<p>revisions presented during supplementary consultation.</p> <p>Also at the Local Refinement Consultation in 2022, the Applicant widened the replacement green bridge at Thong Lane over the M2/A2 by a further 10 metres.</p> <p>The design of these green bridges has been informed by the practicalities of constructing replacement structures over the A2, while needing to avoid the total closure of the A2 during this process, as its closure was deemed to be too impactful to the wider road network. This balance between level of 'greening' and keeping the A2 open during construction is something that the Applicant discussed during design workshops with Gravesham Borough Council and Kent County Council. The Applicant has therefore sought to provide as much planting as possible on the green bridges that span the A2 corridor without requiring closure of the strategic road network in this location or impacting on third-party green bridges that span the gap between the A2 and HS1 railway, which the new A2 green bridges need to tie-in to, thereby providing connectivity across the whole A2-HS1 corridor. Further information is contained within the Design Principles document (Appendix B Project Enhanced Structures – Bridges).</p>	<p>Principles [Document Reference 7.5 (7)]</p> <p>Project Design Report Part D: General Design South of the River [<a href="#">APP-509</a>]</p>	

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			Regarding Thong Lane north green bridge, the Applicant acknowledges that it was shown incorrectly as a straight line (instead of curved) at Community Impacts Consultation. This has been corrected in the latest consultation material.		
<b>Infrastructure/Landscape Integration</b>  Loss of A2 wooded central reservation	2.1.26	Unhappy about the highly wooded central reservation being lost, it softens the appearance and masks noise.	Options were explored to either retain or reinstate the central reservation. However, both options would have resulted in the further widening of the A2/M2 corridor and encroach further into the adjacent ancient woodland and SSSI areas. It was felt better to keep the A2/M2 corridor as narrow as possible to reduce impact on the existing woodland.	N/A	Matter Not Agreed
<b>Infrastructure/Landscape Integration</b>  Landscaping for local benefit	2.1.27	Landscaping should be focused on and primarily to benefit local residents before any beautification to improve user experience. SPC Update: Our opinion has not changed. Having looked at the cross sections now provided it is obvious that the LTC:A2 junction will be highly visible, detrimentally so, for residents of Shorne West and Riverview Park. Also that ambience of some walking routes is poor.	The Applicant's aim is to provide a balance of suitable mitigation against the existing heritage and character of the local area. For example, Thong Village conservation area is described as having open views out to the countryside, so where possible these have been retained. Woodland planting has been provided to the south-west of Thong Village to provide visual screening of the junction and its associated infrastructure. To the west the Project is in a cutting, so where possible, open views are retained. A walking, cycling and horse-riding strategy has been woven into the landscape design to ensure a variety of routes in this area,	Project Design Report Part D: General Design South of the River [ <a href="#">APP-509</a> ] and Part E: Design for Walkers, Cyclists and Horse Riders [ <a href="#">APP-512</a> ]  Enhanced Cross Sections (Part 1	Matter Not Agreed

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		<p>There need to be greater use of bunding and acoustic fencing along margins of elevated roads. The cross sections also bring into question the location of Chalk Park, the waste chalk mound might be better positioned north of the A2 and west of the LTC:A2 junction.</p> <p>SPC Final Update: We are not concerned with “user experience” for people randomly passing through the area but in protection of residents who have to live with the consequences of the project 24/7.</p> <p>We disagree with the comments about design. The area is already open and used for walking as farmland and golf course. The footpath system is better currently without severance of NS167.</p> <p>Residents in Marling Cross, Shorne West and Riverview Park are not being protected from the adverse effects of the A122:A2/M2 junction.</p>	<p>connecting Gravesend with the wider countryside and the country parks.</p> <p>The Project Design Report sets out how the preliminary design was developed in Part D: General Design South of the River and Part E: Design for Walkers, Cyclists and Horse Riders.</p> <p>The Applicant’s view about greater acoustic fencing and bunding, as suggested by Shorne Parish Council, is that it is not appropriate on all elevated roads to maintain user experience and an open setting. The Applicant has presented the impacts of the Project on the landscape in ES Chapter 7: Landscape and Visual. During this assessment, mitigation requirements were identified and have been incorporated into the proposals, either as mitigation that is embedded within the design of the Project and secured by the relevant plans (e.g. the Engineering Drawings and Sections) and Design Principles, or as features presented on the Environmental Masterplan which is secured through Requirement 5 of the draft Development Consent Order, or as good practice or essential mitigation within the Code of Construction Practice (CoCP) and the Register of Environmental Actions and Commitments (REAC), which forms part of the CoCP.</p>	<p>of 2) <a href="#">[REP2-069]</a></p> <p>Engineering Cross Sections <a href="#">[REP2-070]</a></p> <p>Enhanced Cross Sections (Part 2 of 2) <a href="#">[REP2-071]</a></p> <p>ES Chapter 7: Landscape and Visual <b>[Document Reference 6.1 ES Chapter 7 (2)]</b></p> <p>Engineering Drawings and Sections <b>[Document Reference 2.9 Volume A (6), Volume B (6), Volume C (2), Volume D (2), Volume E (5),</b></p>	

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			<p>To address concerns raised by Interested Parties during Examination, the Applicant has produced a number of additional cross-sections and enhanced cross-sections which show the elevations across the junction and surrounding area. The enhanced cross-sections show the proposed planting through the junction and how this has been designed to help screen the link roads.</p> <p>The location of Chalk Park has been selected for several reasons, which include:</p> <ul style="list-style-type: none"> <li>• To reduce the impact on Kent AONB and maintain the characteristic rolling landforms in this area.</li> <li>• To take into account the setting of the village of Thong. To maintain as much “open aspect” between the edge of Gravesend East to the conservation area as possible</li> <li>• The existing topography – the existing hill at the chosen location of Chalk Park means we can exaggerate the landform without completely altering its character. The landscape around Thong is more gently rolling and would be fundamentally changed by the deposit of a large amount of earthworks there.</li> <li>• Beneficial placement – material cannot be placed without a good justification for</li> </ul>	<p><b>Volume F (3), Volume G (2), Volume H (2)]</b></p> <p>Design Principles  <b>[Document Reference 7.5 (7)]</b></p> <p>ES Figure 2.4: Environmental Masterplan  <b>[Document Reference 6.2 ES Figure 2.4 Sections 1 and 1a (4), Section 2 (5), Section 3 (4), Section 4 (2), Section 9 (6), Section 10 (4), Section 11 (3), Section 12 (3), Section 13 (3), Section 14 (3)]</b></p> <p>Draft DCO  <b>[Document</b></p>	

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			it's location and use. The Applicant has developed Chalk Park to be an open space and "stepping stone" to Shorne woods country park. The chosen location gives people to the North -west of the alignment, with a deficiency of access to semi-natural open space, better access to it.	<b>Reference 3.1 (11)]</b>  ES Appendix 2.2: Code of Construction Practice <b>[Document Reference 6.3 ES Appendix 2.2 (9)]</b>	
<b>Design</b>  Removal of access from northern feeder road to M2 eastbound	2.1.28	Removal of access from northern feeder road to M2 eastbound, should be restored: This was in earliest plans then removed without prior discussion. Claims of lack of safety are not accepted as valid, it should be reinstated.  Removal means a long diversion for some directions of traffic via routes that will be choked/jammed at peak hours.  There will be an increase in rat running through Shorne by traffic previously turning onto the A2/M2 at Brewers Road.	A direct link is not provided to the A2/A289 however a new two-way local link road is provided to cater for this movement. A direct link to the M2 eastbound is provided.	N/A	Matter Not Agreed
<b>Design</b>	2.1.29	All directions of travel are being made more difficult and journeys	The Applicant has looked at the junction configuration and has provided more direct	Supplementary Walking, Cycling	Matter Not Agreed



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Increased journey times		<p>will be longer, traffic light facilitation is needed: From Shorne and Gravesend East it will be exceedingly difficult to make many journeys (including accessing stations, supermarkets and shopping centres):</p> <p>To reach A2 westbound requires negotiating several traffic light-controlled roundabouts.</p> <p>To reach M2 eastbound requires long diversion of extra 2km on A289 northbound then U-turn at Higham, already a busy and jam prone route, this needs traffic light facilitation.</p> <p>An alternative route via northbound from Shorne village requires a hazardous right turn at a busy and fast crossroads on the A226, this needs traffic light facilitation.</p> <p>Traffic from Gravesend East cannot access the A2/A289, only the M2, this will also lead to traffic travelling further and for longer. The design there should also be revisited as an extra link could be provided.</p>	<p>connectivity between Gravesend and the M2 eastbound; and has redesigned the Gravesend East junction and link roads to improve journey times and reduce the impact on the local roads.</p> <p>The Applicant would like to clarify that the A2 corridor and Local Road Network (LRN) has been designed to current standards and traffic modelling undertaken to assess its impact on traffic flows. This has shown that the layout and capacity of referenced junctions are suitable for the predicted traffic flows.</p> <p>In addition, a review of the pedestrian crossings has been undertaken and controlled crossings are to be provided where required. The proposed location of crossings south of the river are presented in the Supplementary Walking, Cycling and Horse Riding (WCH) Maps (Volume A). The principles that would be considered in further design of WCH routes are described in Section 4.2 of the Design Principles.</p>	<p>and Horse Riding (WCH) Maps (Volume A) <a href="#">[REP2-072]</a></p> <p>Design Principles <b>[Document Reference 7.5 (7)]</b></p>	

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		<p>Difficulty exiting Thong Lane onto the southern two-way link road when wanting to travel west on the A2 as need to turn right across the dominant traffic flow, may need traffic lights or yet another roundabout.</p> <p>Increased journey times for local residents cause increased personal costs.</p> <p>SPC Update 31/8/23: Our opinion has not changed. The discussion here is about drivers not WCH.</p> <p>The design may well be to “current standards” but that doesn’t mean that it is a good and functional design, Junction modelling data shows that the Brewers Road off-slip is poorly functioning and that traffic is likely to back up onto the northern feeder road (itself very congested) as we had said previously.</p> <p>We also disagree with NH’s opinion stated in their ISH 1 response (our points have been misinterpreted) in REP1-183, B.3.6 page 57 that only 5 trips per</p>			

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		hour might U-turn at the A226:A289 junction. This has been explored further on page 14 in our REP3-201 response.  In our view traffic lights are needed at the T-junction at the southern end of Thong Lane.			
<b>Design</b>  Reduction of M2 to two lanes eastbound through Gravesend East	2.1.30  RRE	The width of the M2 line has been reduced from current four lanes to only two eastbound through Gravesend East, SPC do not believe this will be adequate.	This section will still provide the capacity for the forecast traffic flows for two lanes (Transport Assessment). Appendix C of the Combined Modelling and Appraisal Report Appendix C: Transport Forecasting Package, will have some of the flow numbers (including at the M2/A2/A122 Lower Thames Crossing junction).	Transport Assessment <a href="#">[REP4-148 to REP4-152]</a>  Combined Modelling and Appraisal Report Appendix C: Transport Forecasting Package <a href="#">[APP-522]</a> and <a href="#">[APP-523]</a>	Matter Not Agreed
<b>Safety</b>  Sight lines exiting Shorne Ifield Road to Thong Lane	2.1.31	Sight lines exiting Shorne Ifield Road to Thong Lane need improving: The Project works are altering the road layout so that Shorne Ifield Road emerges on the inside of a blind bend with inadequate visibility, this needs to	The Applicant has clarified that the realignment of Thong Lane has been designed to current standards and the required visibility at this junction is provided in both north and south directions.	N/A	Matter Not Agreed

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		be corrected by revising the alignment of Thong Lane.			
<b>Safety</b>  Lack of hard shoulders	2.1.32	Raised many times, whether classified as Smart Motorway (as originally), Expressway or whatever the Project is now being called (All-purpose trunk road?), hard shoulders are needed for safety reasons.	<p>Improving safety is one of the Project's objectives. The Lower Thames Crossing would be an all-purpose trunk road, similar to the A13 and other A-roads. It is being designed and built to the highest safety standards recommended, but the Applicant will continue to adapt its proposals in line with new guidance. The new road's safety features would include vehicle detection, emergency areas, variable mandatory speed limits and lane closure signals in the event of an incident, such as a vehicle breakdown or collision.</p> <p>Control measures across the route, including in the tunnel, would identify vehicles stopping in a live lane and allow for rapid changes of traffic management to avert danger. In the tunnels, recovery services would be provided for any stopped vehicle. Technology would also help the emergency services to access incidents. This includes signage that can be changed to alert road users of lane closures, speed restrictions and incidents ahead. If one tunnel is blocked, emergency vehicles could access incidents using the pedestrian cross-passages that connect the two tunnels at regular intervals.</p>	<p>Consultation Report  <a href="#">[APP-064 to APP-090]</a></p>	Matter Not Agreed

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			Further information is presented in the Consultation Report.		
Design  Location and nature of southern tunnel control building, and pumping stations, other structures	2.1.33	<p>Extra structures appear on new plans despite assurances that will not happen, questions about the tunnel control building and pumping stations remain unanswered.</p> <p>SPC Update: A helicopter landing area and emergency muster point has been added and potentially a large parking area and cluster of buildings at the southern end of Thong Lane.</p> <p>The Artists Impression of the South Portal Tunnel Services building shows it as visually intrusive in the landscape rather than being buried underground as was promised. Note use of word “potentially” in the NH response regarding the pumping station.</p> <p>SPC Final Update: The Thong Lane car park (which is what we were referring to) and buildings have been removed, thank you.</p> <p>The emergency requirements were not explicitly discussed to us</p>	<p>At Supplementary Consultation the Project consulted on three potential locations for the proposed substation at the A226, the preferred location of which was presented at the Design Refinement Consultation. Also at the Design Refinement Consultation, the Applicant communicated the proposal to install a compound along Thong Lane for the relocated switchgear equipment. Following feedback, the proposals were combined at the A226 and presented at Community Impacts Consultation.</p> <p>The South Portal Tunnel Services Building and potentially the pumping station will be located within the portal itself.</p> <p>The rendezvous point near the South Portal Tunnel Services Building has always been included within the General Arrangements and a helicopter landing area was always identified in the Design Principles. On sheet 13 of the General Arrangements there is no other detail such as a parking area as suggested by Shorne Parish Council. The detailed design and layout of the Rendezvous point would be developed in consultation with emergency services as stated at Clause no. S3.20 in the Design Principles.</p>	<p>General Arrangement Plans  <b>[Document Reference 2.5 Volume A (5), Volume B (5), Volume C (6)]</b></p> <p>Design Principles  <b>[Document Reference 7.5 (7)]</b></p> <p>Project Design Report Part F: Structures and Architecture  <a href="#">[APP-513]</a></p>	Matter Not Agreed

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		<p>or pointed out earlier in the consultations.</p> <p>The Tunnel services building will be visible from higher ground, especially if/when lit at night. Footpaths pass close and WCH users will be able to see it. While the view from the south only has a small and low-rise sector of glass, the view from the north has a very wide arc and is two or more storeys high from the surrounding excavated roadway even if the roof is level with nearby land. We were told it would be underground, which is not the case. It needs to be much more camouflaged.</p>	<p>The artists impression of the South Portal Tunnel Services Building is shown on Page 24 of the Project Design Report. The Applicant has designed the building to be integrated within the surrounding landscape. The roof of the building is at grade with the existing ground level therefore the Applicant does not consider it would be visually intrusive. Design Principles Clause nos. S3.10 and S3.11 set out further principles to ensure that the portal facilities and building are designed to blend into the surrounding landscape with earthworks to be created around the structure with small blocks of woodland planting.</p>		
<p><b>Project Design and Mitigation</b></p> <p>Tunnel Drainage</p>	<p>2.1.34</p>	<p>SPC felt that more information on the method and route for tunnel drainage was required but acknowledge the National Highways comment and now understand that this will be further explained in the Hydrogeological Risk Assessment.</p> <p>Drainage of the roadways in general has been clarified further in REP6-008 so this point is agreed (however, concerns remain about adequacy when</p>	<p>Tunnel drainage will be pumped to a treatment and storage facility in the vicinity of the north portal and discharged from a new outfall that would be constructed on the north bank of the River Thames in proximity to the existing Bowaters Sluice.</p> <p>ES Appendix 14.5: Hydrogeological Risk Assessment provides further information.</p>	<p>ES Appendix 14.5: Hydrogeological Risk Assessment [APP-458 and APP-459]</p>	<p>Matter Agreed</p>

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		there are peak volumes of water to be drained.)			
Design  Design for local weather conditions	2.1.35	<p>Design must be for true local weather conditions (e.g. torrential rain, sea fogs as in Estuarine weather) and for peaks rather than looking at averages measured at distant monitoring stations e.g. rainfall data used was from Heathrow.</p> <p>SPC Update: This is about the present not the future, so the answer does not completely fit the questions.</p> <p>Dealing first with fogs, the documents just say that these may happen and cause problems that impact on road users (impact, i.e. accidents, being the anticipated problem as happened at the Sheppey Bridge A249). The point is that fogs occur more frequently in this location than further west.</p> <p>Our concern is that the road drainage can cope with torrential rain without there being overflows. We are not reassured.</p> <p>Snow and ice is another aspect as the very long slope will also</p>	<p>The Applicant has designed the Project for the appropriate weather conditions and has taken extreme weather events into account.</p> <p>The Applicant has followed National Highways' Design Manual for Roads and Bridges (DMRB) guidance to design the Project which provides the minimum requirement for all aspects of highways design and highways assets. The DMRB also sets out the requirement for Road Safety Audits which will identify any potential issues that may require a change to the design. The Applicant has undertaken the Stage 1 audit which showed no concerns that needed to be addressed at this design stage. The Applicant is satisfied that, based on this safety audit, the highways design is suitable for extreme weather events. Further consideration will take place at the next stage of design.</p> <p>More information about assessments related to weather can be seen in ES Appendix 15.3: Climate Resilience Impacts and Effects, and Appendix 4.2: Major Accidents and Disasters Long List.</p>	<p>ES Appendix 15.3: Climate Resilience Impacts and Effects <a href="#">[APP-482]</a></p> <p>ES Appendix 4.2: Major Accidents and Disasters Long List <a href="#">[APP-341]</a></p>	Matter Not Agreed

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		pose a risk. We are also concerned about de-icing chemicals potentially causing contamination.  We are not yet reassured that design and operational aspects of drainage are adequate.			
<b>Mitigation</b>  Protection from rat running on local roads	2.1.36  RRE	Where the proposed layout is likely to result in additional traffic flow and rat running being induced on local residential and unsuitable roads, protective solutions should be integral to/integrated with the Project.	The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.  An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) is included in the application, providing information about the proposed traffic monitoring.	Wider Network Impacts Management and Monitoring Plan <b>[Document Reference 7.12 (2)]</b>	Matter Not Agreed
<b>Junctions</b>  Junction of LTC with A226 (removed)	2.1.37	Objections were raised to the insertion of this junction, which caused widespread shock and strong objections concerning traffic impacts from many sources, including from SPC. The junction was subsequently	The Applicant removed the A226 junction from the design in November 2017.	N/A	Matter Agreed



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		removed from plans however the principal reason was probably that engineering considerations required the tunnel to be longer and deeper, which made the junction non-viable.			
<b>Tunnels</b>  Footbridge on footpath NG7 (removed)	2.1.38	Objections were raised by SPC and others to the very high footbridge proposed on footpath NG7, which had very poor ambience (due to crossing a very wide chasm containing the Project) and introduced a suicide risk location. With the elongation of the tunnel (see previous point) it was not needed and was removed.	The Applicant amended the tunnel portal design by extending it a further 350m and the footbridge over the tunnel was diverted in January 2020.	N/A	Matter Agreed
<b>Access</b>  Informal parking area near Thong Lane north green bridge (removed)	2.1.39	Objections were raised by SPC and others when this proposal suddenly appeared in the plans in an inappropriate location. It was subsequently removed again.  SPC Update: Objections to the proposed Thong Lane southern end car park proposal remain, see additional new point 2.1.113.	In response to concerns expressed by stakeholders in relation to the potential effects of recreational facilities (as expressed at Issue Specific Hearing 9 and through stakeholder engagement) the Applicant intends to remove the car park proposals (i.e. Work No. 1P) from the Application as confirmed in Deadline 7 Hearing Actions.  More information about the removal of the car park is provided in item 2.1.113 below.	Deadline 7 Hearing Actions <a href="#">[REP7-185]</a>	Matter Agreed

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<p><b>Design</b></p> <p>Proposed car park at Thong Lane south</p>	<p>2.1.113</p> <p>DL9A</p>	<p>Proposed Car Park at Thong Lane south. This was discussed in various documents and hearings, we have various concerns:</p> <ul style="list-style-type: none"> <li>• Land involved has been compulsory/voluntary purchased</li> <li>• Creation of works compound involves loss of current Gravel Hill wood and horse pastures.</li> <li>• Land expected to be landscaped after construction use, any area lost by retention should be provided additionally elsewhere.</li> <li>• Inappropriate development in the Green Belt, NH should not be facilitating a business development being created by circumventing planning regulations designed to protect the area and residents, and not in favour of one particular business.</li> </ul> <p>We are very strongly opposed to this proposal, as expressed in detail in REP6-199 and REP6-201.</p> <p>This item is not agreed as still some structures and layout showing on plans rather than being fully landscaped.</p>	<p>In response to concerns expressed by stakeholders in relation to the potential effects of recreational facilities (as expressed at Issue Specific Hearing 9 and through stakeholder engagement) the Applicant intends to remove the car park proposals (i.e. Work No. 1P) from the Application as confirmed in Deadline 7 Hearing Actions.</p> <p>Removing the car park would enable an area of mitigation planting to be relocated further east (to provide screening of substations SS2 and SS3 and the associated Thong Lane access road) resulting in a circa 5,600sqm area of land changed from requiring permanent acquisition powers to temporary possession of land only. This amendment is described in detail at Section 5.9 of the Deadline 7 Hearing Actions and includes Plate 5.1 which shows the proposed update to the Land Plans.</p> <p>The car park has been removed as shown on sheet 4 of the General Arrangements at Deadline 7.</p>	<p>Deadline 7 Hearing Actions  <a href="#">[REP7-185]</a></p> <p>General Arrangement Plans Volume B  <b>[Document Reference 2.5 Volume B (5)]</b></p>	<p>Matter Not Agreed</p>

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		<p>SPC Final Update: The Thong Lane car park and buildings have been removed, thank you.</p> <p>Some aspects of the landscaping still need further attention, please see REP8-184 and REP8-185.</p>			
<b>Construction</b>					
<p><b>Communication and community engagement</b></p> <p>Construction information</p>	2.1.40	<p>More info needed on liaison with constructors, lighting, working hours, nature of compounds and their access routes: Some information may come later but presently there are concerns over how liaison will occur with the community, nocturnal lighting, noise, what the compounds are for and how they are accessed.</p> <p>SPC Update: The point about liaison itself has been answered but information about actual impacts and their possible mitigation is still lacking as being left to post DCO processes.</p> <p>There are concerns that impacts during construction (and operation) are being underpredicted.</p> <p>Following a meeting on 7<sup>th</sup> November, SPC and the Applicant agreed this would move</p>	<p>The Applicant has sought to reduce the Project's impact on the local community during its construction phase. Mitigation measures are included in the Register of Environmental Actions and Commitments (REAC) within ES Appendix 2.2: Code of Construction Practice (CoCP), to minimise the potential effects of dust, noise, and light impacts.</p> <p>Working groups such as the Community Liaison Groups and Traffic Management Forum will be key to ensuring that the community is kept informed of the Project and is therefore prepared for forthcoming changes and construction activities. As set out in the CoCP, the Applicant will work closely with stakeholders on the membership of the groups which will include representatives from the local community including Shorne Parish Council.</p> <p>The outline Traffic Management Plan for Construction (oTMPfC) details how</p>	<p>REAC within the Code of Construction Practice <b>[Document Reference 6.3 ES Appendix 2.2 (9)]</b></p> <p>Outline Traffic Management Plan for Construction (oTMPfC) <b>[Document Reference 7.14 (9)]</b></p> <p>ES Chapter 12 Noise and Vibration <b>[APP-150]</b></p>	Matter Not Agreed

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		<p>to not agreed because SPC are concerned about the impacts during construction and lack of information at this stage.</p> <p>SPC are concerned that there is no community representative listed in Table 2.1 of the oTMPfC.</p> <p>SPC Final Update: The Community Liaison Groups are welcomed, thank you. However more detail is needed about communications with other groups.</p>	<p>construction traffic will be managed to mitigate effects on the local community.</p> <p>ES Chapter 12: Noise and Vibration includes noise and visual assessments from construction activities including working hours from several perspectives (e.g. noise) which has informed mitigation measures.</p> <p>The Applicant has set out the introduction of Community Liaison Groups (CLG) in the oTMPfC, which would include representation from the local community. Local Community leaders of the CLGs will be invited to the Traffic Management Forum (TMF) as described in paragraph 3.3.10. Appendix E of the oTMPfC is the Terms of Reference for the TMFs which also sets out at paragraph E.3.2 that in addition to attendees stated in Table 2.1 other relevant stakeholders will be invited by the Traffic Manager when their participation is pertinent and relevant.</p>		
<p><b>Worker transport</b></p> <p>Use of staff construction vehicles on residential roads</p>	<p>2.1.41</p> <p>RRE</p>	<p>Concern about construction staff large vehicles using residential roads: Many roads locally are narrow and not suitable for increased traffic, staff vehicles should also access compounds through routes within the construction boundary rather than by residential roads. The concern arises that staff vehicles are</p>	<p>Details of potential haul routes were supplied at Supplementary Consultation in January 2020. The Applicant is committed to a Traffic Management Plan for Construction (TMP) in the draft DCO, which would be developed post DCO consent by the Contractor, in line with the controls in the oTMPfC and the approved CoCP.</p> <p>ES Chapter 12: Noise and Vibration</p>	<p>oTMPfC [Document Reference 7.14 (9)]</p> <p>Draft DCO [Document Reference 3.1 (11)]</p>	<p>Matter Not Agreed</p>

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		<p>larger and heavier than what residents would regard as standard private cars.</p> <p>SPC Update: These concerns have not changed, along with construction traffic volumes and routes which keep being changed.</p>	<p>presents a full assessment of noise and vibration.</p> <p>The Applicant explained that HGVs will be banned from some routes, as outlined in the oTMPfC. The use of the strategic road network and LRN is required to deliver the works. Existing restrictions will be respected.</p> <p>Temporary offline haul routes will be constructed directly off the strategic road network where possible.</p> <p>The Framework Construction Travel Plan (FCTP) sets out the Project's approach to management of workforce transport to and from the construction compounds. It has not been considered appropriate to prohibit workers' use of specific routes/modes of transport, but workers will be encouraged to use certain routes to access the sites.</p> <p>In line with this overarching FCTP, Contractors would be required to develop Site-Specific Travel Plans (SSTPs) in respect of the sites for which they are responsible (either an individual construction worksite or compound and Utility Logistics Hub (ULH), or a number of construction worksites, compounds and ULHs where these are closely located with similar levels of accessibility), following the latest policy advice and best practice documents and before the relevant part of</p>	<p>CoCP  [Document Reference 6.3 ES Appendix 2.2 (9)]</p> <p>ES Chapter 12: Noise and Vibration  <a href="#">[APP-150]</a></p> <p>FCTP  [Document Reference 7.13 (6)]</p> <p>Post-event submissions for ISH4 <a href="#">[REP4-180]</a></p>	

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			<p>the authorised development can commence. The Applicant will work with Kent County Council, as the local highways authority, as it will be a consultee in the preparation of SSTPs. Shorne Parish Council can request representation from Kent County Council.</p> <p>The FCTP and future SSTPs are designed to incorporate the flexibility needed to respond and adapt to changing conditions over the duration of the construction of the Project and will require a continuous monitoring and reviewing process. Regular employee travel surveys would be undertaken at each site, reviewing targets and indicators as necessary.</p> <p>A Travel Plan Liaison Group (TPLG) would be established, with the collective responsibility of providing high-level support to, and critical review of, travel planning across the Project. It would support efforts towards achieving greater use and increased uptake of sustainable travel, monitoring and reviewing progress, and agreeing new or amended initiatives. To ensure sufficient progress is being made, the effectiveness of this FCTP and SSTPs would be reviewed, audited and reported to National Highways by the Travel Plan Manager.</p>		

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			<p>A substantial proportion of the workforce will be local, and some of those may live in areas whereby closing certain routes to them would be an unfair disadvantage.</p> <p>In relation to construction traffic volumes, the forecast number of construction related vehicles has reduced since Statutory Consultation (2018). Furthermore, this matter was responded to in Post-event submissions for ISH4, where additional detail on the subject can be found.</p> <p>Additionally, construction traffic routes have been generally consistent in the southern area of the Project</p>		
<p><b>Impacts</b></p> <p>Milton Compound and ground preparation tunnel</p>	2.1.42	<p>Milton Compound and ground preparation tunnel, multiple concerns: Milton Compound is within the North Kent Marshes Special Protection Area (SPA) and could negatively affect the Thames and Medway Canal bed and banks though access by very heavy vehicles and the construction of the ground preparation tunnel, assurances are needed.</p> <p>Concerns about injection of “grout” could cause damage, dewatering and contamination, have asked for more info including about other places</p>	<p>The Applicant is aware of the condition of the existing access road. Localised strengthening will be required along with a full condition survey before construction takes place. The road will be upgraded where necessary in order to cope with the loadings and frequency required.</p> <p>These proposals have been discussed with the Thames and Medway Canal Association.</p> <p>All works will be carefully planned, designed and executed, with full cognisance of the impacts caused and mitigated as far as feasibly possible. The canal will be reinstated as agreed with the relevant bodies, prior to works commencing.</p>	N/A	Matter Not Agreed

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		<p>where it has been used successfully.  Concerns about access routes.</p> <p>SPC Update: A meeting was held between SPC and the Applicant's tunnelling expert about the Ground Preparation Tunnel on 9<sup>th</sup> October 2023. This provided very useful information but could not allay all concerns.</p> <p>We raised (as in REP5-124 pages 13-14) that direct injection of grout from the surface might be less damaging than having the two large shafts and tunnel, which would remain in place in perpetuity.</p>	<p>The grout tunnel remains a contingency measure, which the Applicant will not know to be necessary until detailed design.</p>		
<p><b>Impacts</b></p> <p>Dewatering</p>	2.1.43	<p>Concerns about effect of any deliberate dewatering e.g. for ground preparation tunnel, the Chalk compound close to the church.</p> <p>Need clarification of all activities there.</p> <p>Also concerned about any unintended dewatering of marshes as has occurred e.g. at HS1 at Swanscombe.</p>	<p>The effects of the Project's construction activities, as well as its operation have been subject to extensive studies, undertaken in collaboration with the Environment Agency and Natural England. The studies described in ES Appendix 14.5: Hydrogeological Risk Assessment demonstrate that with the embedded and secured design and mitigation in place, there will be no significant effects.</p> <p>The Applicant has explained and justified its position regarding Dewatering at ISH5. This</p>	<p>ES Appendix 14.5 Hydrogeological Risk Assessment [<a href="#">APP-458</a> and <a href="#">APP-459</a>]</p> <p>Post-event submissions, including written submission of</p>	Matter Not Agreed



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		SPC are still concerned about dewatering therefore this matter has moved to Not Agreed.	is set out in Post-event submissions, including written submission of oral comments, for ISH5.	oral comments, for ISH5 <a href="#">[REP4-181]</a>	
<b>Closures and diversions</b>  Bridge closures on Brewers Road and Thong Lane	2.1.44	<p>The duration of bridge closures, which cause considerable disruption to local residents, should be minimised but preferably through measures other than 24h working.</p> <p>Thong Lane north bridge – should be possible to divert traffic to the side while bridge is built</p> <p>Brewers Road – minimise time, consider possibility of temporary use of Park Pale bridge</p> <p>The above and Thong Lane south overbridge should not be closed simultaneously.</p> <p>SPC Update: Mostly agreed but the suggestion about temporary use of Park Pale bridge was not picked up at that time. It has been discussed further since but in fact may not be needed if diversion routes are properly signposted, please see pages 2-3 of REP7-271 as discussed in item 2.1.110.</p>	<p>Brewers Road and Thong Lane are never closed at the same time to ensure access across the A2 is not completely severed. This is a commitment that will be secured in the oTMPfC.</p> <p>The Applicant will work with the authority and Contractor, collectively, during the detailed design phase to optimise the solution to reduce duration as far as is reasonably practicable.</p> <p>The Applicant will continue to engage with Shorne Parish Council regarding the proposed duration of bridge closures.</p> <p>During the proposed closure of Brewers Road bridge, a diversion would need to be in place. Section 4.7 in the oTMPfC shows a possible diversion route which could be in place for Brewers Road.</p> <p>The exact diversion route would be subject to engagement with the relevant authorities during the development of the TMP. The diversion route would be determined through discussions with the local highway authority nearer to the time of construction as other factors may need to be taken into account – such as other concurrent works in the nearby area.</p>	oTMPfC <b>[Document Reference 7.14 (9)]</b>	Matter Not Agreed

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		<p>Please see also new matter 2.1.110 which is connected to this and is about traffic through Shorne during the bridge closure.</p> <p>This matter has moved to Not Agreed because SPC are concerned about the impacts, duration of closure and the diversion routes.</p>	<p>In terms of the use of Park Pale as an alternative, there are no existing connections onto the A2 via Park Pale, nor would it be technically feasible to make the appropriate new connections to the A2 due to the proximity of existing merges and diverges with the M2 junction 1. Park Pale is also a dead-end and there is no existing connection to Brewers Road on the south side of the A2.</p>		
<p><b>Road alteration and maintenance</b></p> <p>Protection of residents during construction</p>	2.1.45	<p>Tree planting in final position plus protective earth bunds should be put in place at the earliest possible date.</p> <p>Night-time working should be avoided as much as possible, maps of affected areas were not clear.</p> <p>Summer working hours are too long (06.00 to 23.00).</p> <p>Haul roads are very close to residential locations.</p> <p>SPC Update: The first point was about tree plantings protecting residents from all forms of pollution being installed in their final position very early on in the works programme.</p>	<p>ES Chapter 12: Noise and vibration includes noise and visual assessments from construction activities. Mitigation measures have been proposed to lessen the impact of these activities to residential housing including the use of bunds and fences where deemed appropriate.</p> <p>Woodland planting will also be specified to suit its mitigation needs when required for visual screening.</p> <p>Night working is proposed usually where traffic conditions would not allow daytime closures due to the impact on traffic.</p> <p>Extended working hours (after 19:00) are intermittent and are required to cover certain construction activities that require more than the standard working hours to be completed. More information is provided in the CoCP.</p>	<p>ES Chapter 12: Noise and Vibration <a href="#">[APP-150]</a></p> <p>CoCP <b>[Document Reference 6.3 ES Appendix 2.2 (9)]</b></p> <p>oTMPfC <b>[Document Reference 7.14 (9)]</b></p> <p>REAC within the Code of Construction Practice</p>	Matter Not Agreed

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		<p>The lists of extended hours and night time working referenced in REP1-157 are very long, with a large number of residents likely to be exposed to noise nuisance for weeks/months at a time, there needs to be greater consideration of their needs.</p> <p>“Key stakeholders” requires elaboration. Input is different from influence. Working hours impacts relate to all construction activities and not just construction traffic.</p>	<p>The oTMPfC outlines a proposed traffic forum which would discuss the appropriate traffic measure to implement and would have input from key stakeholders.</p> <p>Where feasible, planting would be undertaken at the earliest practicable opportunity as set out in the Register of Environmental Actions and Commitments (REAC) in the CoCP under item number LV029.</p> <p>The Applicant has sought to reduce the Project's impact on the local community during its construction phase. Measures are included in the REAC in the CoCP to minimise the potential for dust, noise, and disruption.</p> <p>Chapter 2 of the CoCP states that the Second Iterations of the Environmental Management Plans (EMP2) developed by the appointed Contractors would set out their procedures for monitoring compliance with the mitigation measures set out in the CoCP and the REAC relevant to the works. The EMP2s would include Contractor roles and responsibilities, together with appropriate control measures, training and briefing procedures, risk assessments, stakeholder engagement and monitoring systems to be employed. The Applicant would provide regular communication and advance notice of activities during the</p>	<p><b>[Document Reference 6.3 ES Appendix 2.2 (9)]</b></p>	

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			<p>construction period. Paragraph 5.3.2 of the CoCP states that at least two weeks before planned works are carried out, the Contractors would distribute information sheets relating to the programmed activities. The information sheets would detail the expected disruptions and measures being taken to avoid, minimise or mitigate the adverse impacts of these works. A community liaison group (CLG) would be established in communities likely to be most impacted during construction and CLGs would be invited to attend the Traffic Management. Forum (TMF); further details are set out in the CoCP paragraphs 5.2.11 to 5.2.15 and the oTMPfC paragraphs 3.3.15 to 3.3.19 provides further details relating to the TMF.</p> <p>The OTMPfC also outlines proposals for Joint Operations Forums, a TMF and CLGs which would be established to ensure that stakeholders, including community groups are involved in relevant discussions and informed of any upcoming activities.</p>		
<p><b>Road alteration and maintenance</b></p> <p>Widening of A226</p>	2.1.46	<p>Concern any widening should be temporary and reversed post construction.</p> <p>SPC Update: We need more information as to exactly where such widening will take place so as to understand the impacts.</p>	<p>The A226 Gravesend Road has been included in the Order Limits to allow temporary road-widening if required to maintain the safety of other road users while it is used by construction traffic.</p> <p>Temporary traffic management measure proposals will be consulted on with the</p>	N/A	Matter Not Agreed

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		Inclusion of the entire A226 in the order limits is worrying. We do not want the road to be made permanently more urban in residential and rural areas.	relevant highway authority as set out in the oTMPfC which refers specifically to the role of the Traffic Management Forum and traffic manager, with attendees, consultees and contributors listed. As such, the length, nature and duration of temporary traffic management measures will be discussed and relevant highway authority comments, issues considered and incorporated where reasonably practicable.		
<b>Construction traffic impacts</b>  Construction HGV's via Gravesend East roundabout	2.1.47	Concern about adding traffic when there are already queues back onto the A2 itself at peak times.  SPC Update: This is a specific point relating to routeing of HGV's to compounds. The routes that construction vehicles will take, and the volumes, are unclear as these matters are to be decided post DCO, therefore we are expressing concern but cannot be reassured.	The Applicant is committed to a Traffic Management Plan for Construction (TMP) in the DCO, which will be developed post DCO consent by the Contractor, in line with the controls in the oTMPfC and the approved CoCP.  The Applicant explained that HGVs will be banned from some routes, as outlined in the oTMPfC. Use of the local and strategic road networks is required to deliver the works. Existing restrictions will be respected.  Temporary offline haul routes will be constructed directly off the strategic road network where practicable.	oTMPfC [Document Reference 7.14 (9)]  CoCP [Document Reference 6.3 ES Appendix 2.2 (9)]	Matter Not Agreed
<b>Closures and diversions</b>  Closure of footpaths and cycle routes,	2.1.48	These need to be minimised, access controlled rather than full closure, there must be safe alternative routes.	The Applicant would seek to minimise impacts on Public Rights of Way (PRoWs) during construction, as much as practicable. All works impacting footpaths/cycle paths will be coordinated with the relevant bodies, and a number of meetings have already	oTMPfC [Document Reference 7.14 (9)]	Matter Not Agreed

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including long distance routes			<p>taken place with Gravesham Borough Council as the relevant local highway authority.</p> <p>The oTMPfC provides a framework for dealing with such stakeholder considerations. Table 2.3 outlines the relevant stakeholders (i.e. WCH users), their requirements and how subsequent TMPs will take these requirements into account to ensure severance will be minimised. These TMPs would be developed post consent (if the Project is consented to), and in line with the controls and commitments in the oTMPfC.</p> <p>Impacts on PRoWs during the construction and operational phases of the Project are assessed in ES Chapter 13: Population and Human Health.</p> <p>Further information on the impact on PRoWs can be found in the Transport Assessment (Application Document 7.9), which sets out the construction impacts on walking, cycling and horse riding.</p>	<p>ES Chapter 13: Population and Human Health  <a href="#">[APP-151]</a></p>	
<p><b>Impacts</b></p> <p>Chalk stockpiles</p>	2.1.49	<p>More information needed, concern about contaminated water efflux reaching marshes. SPC update: The concern is about water leaching from stockpiles, how it is managed and where it is treated, and risk of</p>	<p>The Applicant has provided an assessment on waste which quantifies the likely material arisings (e.g. spoil) and applies measures to divert from landfill. This is in ES Chapter 11: Material Assets and Waste. The REAC will provide detail on committed mitigation such</p>	<p>ES Chapter 11: Material Assets and Waste  <b>[Document Reference 6.1 ES Chapter 11 (2)]</b></p>	Matter Not Agreed

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		<p>potential spillages/overflowing in severe rainfall.</p> <p>Also concern about duration of stockpiling.</p> <p>SPC note that the duration of stockpiles is only to be during the construction period but are still concerned about the drainage.</p>	<p>as location of stockpiles to act as noise and visual barriers.</p> <p>The Applicant has previously responded to points raised by SPC in relation to the construction phase drainage arrangements including the management of rainfall run-off from chalk stockpiles. In Post-event submissions, including written submission of oral comments, for ISH5, the Applicant explained that the Contractors would be required to develop a construction phase drainage plan. This is secured by Project commitments RDWE002 and RDWE006 in the REAC. The construction phase drainage plan would include pollution control systems designed in line with Control of Water Pollution from Construction Sites C532 (CIRIA, 2001). Where temporary chalk stockpiling is required within the southern tunnel entrance compound, the Applicant clarified that provision has been made to manage and treat stockpile runoff via a parallel array of treatment lagoons prior to being discharged to the Thames Estuary and Marshes Ramsar western ditch. This drainage scheme would be subject to the Contractor's detailed design and the level of treatment designed according to the standards specified within the discharge consent granted by the Environment Agency.</p>	<p>REAC within the Code of Construction Practice  <b>[Document Reference 6.3 ES Appendix 2.2 (9)]</b></p> <p>ES Appendix 14.5: Hydrogeological Risk Assessment  <a href="#">[APP-458]</a> and <a href="#">[APP-459]</a></p> <p>Post-event submissions, including written submission of oral comments, for ISH5  <a href="#">[REP4-181]</a></p> <p>ES Appendix 2.2 Annex B: Outline Materials</p>	

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			As noted by SPC, the previously proposed long-term temporary chalk stockpiles have been superseded by an enhanced earthwork approach that removes the need for post-construction removal of surplus excavated materials. The outline earthworks strategy is detailed in ES Appendix 2.2 Annex B: Outline Materials Handling Plan.	Handling Plan [Document Reference 6.3 ES Appendix 2.2 Annex B (5)]	
<b>Closures and Diversions</b>  Traffic through Shorne during closure of Brewers Road Bridge	2.1.110  DL6	(This cross-refers to 2.1.44) The issue raised is about considerable additional traffic through Shorne accessing Businesses north of the A2 while Brewers Road Bridge is closed. These are: Harlex Haulage – Shorne is restricted as no HGV's except for access. That is meant to be access into Shorne from outside, not access via Shorne to the Harlex depot. Other business use at Park Pale – There are other businesses, we are uncertain how much traffic that entails. Rochester and Cobham Golf Club – Members, staff and deliveries.	The proposed Brewers Road bridge closure is envisaged to be 19 months, per Table 4.2 of the oTMPfC. During construction, traffic measures will be consulted on with the relevant highway authority as set out in the oTMPfC. The proposed diversion route, which primarily uses the A2 to access either side of the Brewers Road closure is set out in the oTMPfC Plates 4.9 and 4.10. The exact route is subject to agreement with the local highways authority, Kent County Council.  The commitment for consultation with stakeholders on traffic matters during construction is set out in the CoCP. As described in paragraph 5.2.5, the Applicant will continue engagement and information sharing during construction with stakeholders. Engagement and Communications Plans will be produced with its Contractors which will provide a	oTMPfC [Document Reference 7.14 (9)]  CoCP [Document Reference 6.3 ES Appendix 2.2 (9)]	Matter Not Agreed



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		<p>Shorne Woods Country Park – this is the biggest problem as it will not be physically possible or tenable to have SWCP traffic passing both ways through Shorne, especially at weekends and Bank Holidays.</p> <p>For all the above special events attracting large numbers of visitors are also a potential problem.</p> <p>The situation needs working through in great detail and consideration of business closure/curtailment of activities during the Bridge closure period.</p> <p>This matter is Not Agreed due to lack of information and concerns about community input into plans.</p> <p>We believe diversion routes on the A2 are possible that do not direct traffic through Shorne.</p> <p>Signage will be needed on routes south from the A226 (Forge Lane Shorne and Pear Tree Lane) saying no access to SWCP. See representations at D7(REP7-271, pages 2-3).</p>	<p>detailed programme of community engagement, setting out how relevant planning authorities, businesses, communities and affected parties will be engaged with throughout the construction period.</p> <p>A community liaison group (CLG) will be established in communities likely to be most impacted during construction. The CLGs will ensure that local residents are appropriately informed and therefore prepared for forthcoming changes and construction activities. This includes traffic management measures, whereby the CLGs would be invited to attend the Traffic Management Forum (TMF). Information on the CLGs and the relationship with the TMF is set out in the CoPC in paragraphs 5.2.11 to 5.2.15.</p> <p>Traffic matters would be discussed as part of the development of the Traffic Management Plan, which will be developed following appointment of the main works contractor and in consultation with stakeholders, in line with the controls stated in the oTMPfC.</p> <p>Table 2.3 in the oTMPfC identifies different groups of stakeholders, of which businesses are included, that must be considered when designing traffic management measures, transportation plans, and diversion routes.</p>		

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			<p>As set in paragraph 5.3 of the oTMPfC, part of the engagement in development of the TMP, relevant authorities may highlight special events and seasonal peaks. Where it is not possible to remove traffic management, these points would be raised and discussed in the TMF to determine suitable traffic measures where reasonably practicable.</p> <p>The Applicant has engaged with the businesses named throughout development of the Project and will continue to do so to minimise any disruption during construction. The Applicant is working with Harlex Haulage on a Statement of Common Ground and will continue discussions throughout the examination process.</p> <p>The Applicant does not agree with Shorne Parish Council's comment that there is a lack of information and concerns about community input on the basis that detail about community involvement has been set out in the CoCP.</p>		
<p><b>Impacts</b></p> <p>Change to tunnelling methodology by using single TBM</p>	<p>2.1.114</p> <p>DL9A</p>	<p>Change to tunnelling methodology by using single TBM:</p> <ul style="list-style-type: none"> <li>This proposal actually and potentially alters working practices</li> </ul>	<p>In response to Examining Authority Action Point 2 from ISH1, at Deadline 2 the Applicant submitted Environmental Statement Addendum Appendix C. This outlines how the works would be undertaken if a single TBM were to be used, starting and finishing at the North Portal,</p>	<p>Environmental Statement Addendum Appendix C  <b>[Document Reference 9.8 (9)]</b></p>	<p>Matter Not Agreed</p>

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		<ul style="list-style-type: none"> <li>There will be a significant period of time with 24h working in the Southern Portal compound, we consider that this will have additional impacts of noise and air/dust pollution including light pollution as there will be vehicle and crane movements and slurry pumping 24/7. These need to be recognised and assessed for their impact on nearby residents and businesses.</li> </ul> <p>Although it is said that the second TBM drive will be fully serviced from the north through the first tunnel there could be changes due to location of suppliers winning contracts which would make it expedient to bring supplies directly to the portal using the A2 or more likely A226.</p>	<p>rather than two TBMs both starting at the North Portal and ending at the South Portal, as presented in ES Chapter 2: Project Description. It reviews and demonstrates that the construction effects and conclusions reported within the ES reflect the reasonable worst case scenario for both the single and two TBM scenarios. These construction effects include air noise and air quality, among others.</p> <p>The single TBM method for tunnel construction would involve no physical changes to the permanent works of the Project's footprint presented in the DCO application and the plans which form part of it. It would not require the Applicant to seek new powers over land to deliver the works. The overall length of the construction programme set out in the DCO application would remain the same, whether the tunnels are constructed with one or two TBMs.</p> <p>Additionally at Deadline 2, in response to comments made by Gravesham Borough Council, the Applicant provided a new REAC commitment MW009: <i>"The tunnel boring machinery will be serviced from the North Portal. Material excavated by the tunnel boring machinery will be generated as a slurry and this will be transferred by</i></p>	<p>ES Chapter 2 Project Description  <a href="#">[APP-140]</a></p> <p>REAC within the Code of Construction Practice  <b>[Document Reference 6.3 ES Appendix 2.2 (9)]</b></p>	

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			<p><i>pipeline through the tunnel to the North Portal for placement. Similarly tunnel segments and major services required to operate the tunnel boring machinery and erect the tunnel segments will be supplied from the North Portal.”</i> This is reflected in the latest version of the Code of Construction Practice. This commitment is applicable whether one or two TBMS are utilised.</p>		
<p><b>Construction traffic impacts</b></p> <p>Use of Shorne Ifield Road as a construction route</p>	<p>2.1.115</p> <p>DL9A</p>	<p>In REP4-160, Page 43, Table 4.1 it mentions use of Shorne Ifield Road as an “Offline Route” to the Utilities compound for the “Full period compound is operational”. Shorne Ifield Road is not physically suitable for additional traffic, which would also damage its physical character.</p> <p>We object strongly to its use for any Construction/Utility hub purposes and anyway regard such use as unnecessary as a temporary parallel access route could easily be created on the adjacent fields.</p> <p>We acknowledge National Highways position but this matter is not agreed because it is still subject to the appointed contractor’s decision. We would</p>	<p>The Shorne Ifield Road Utility Logistics Hub would be situated close to Shorne Ifield Road (refer to Plate 4.6 of the outline Traffic Management Plan for Construction for a map showing its location along with other compounds and utility logistics hubs), but the Applicant’s expectation is that construction vehicles would access that work site via an offline route (i.e. a temporary road for its vehicles only) adjoining the A226. Secondary routes to the site would comprise two further offline routes: one adjoining Watling Street and another adjoining Thong Lane.</p> <p>The appointed Contractor would take a risk-based approach to determine access routes, ensuring their suitability for the safe delivery of the works and interface with the public. This is set out in more detail in Sections 4.1 and 4.5 of the oTMPfC.</p>	<p>Outline Traffic Management Plan for Construction (oTMPfC) <b>[Document Reference 7.14 (9)]</b></p> <p>Temporary Works Plans Volume B <b>[Document Reference 2.17 Volume B (5)]</b></p>	<p>Matter Not Agreed</p>

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		expect Shorne lfield Road to be on the list of routes banned for HGVs and all construction traffic.	Sheet 11 of the Temporary Works Plans shows the location of the Shorne lfield Road Utility Logistics Hub (Work No. ULH13) and the access route which is not on Shorne lfield Road.		
<b>Operation &amp; Maintenance</b>					
<b>Safety</b>  Noise and traffic increase on residential roads	2.1.50	Concerns about noise increase, and traffic increasing on unsuitable, residential roads: It has been claimed that some narrow residential roads have increased capacity but physical inspection (or driving through on Google maps) would show this not to be the case. Great concern about traffic increases blocking road, as happens now when there are problems e.g. on the A2.  SPC Update: REP3-112 Plates 7.3, 7.15 and 7.24 refer to volume/capacity increases on these roads (and increases in traffic levels of up to 40%) however there are no standard capacity figures for roads of these types so the validity of the data is unclear.	The Applicant has not claimed that any narrow roads have increased capacity.  The Applicant is committed to a Traffic Management Plan for Construction (TMP) in the draft DCO, which would be developed post DCO consent by the Contractor, in line with the controls in the oTMPfC and the approved CoCP.  The Project's transport model has been built using data from existing models and in line with the Applicant's regional transport manual coding. See Section 5.2 of the Combined Modelling and Appraisal Report – Appendix B – Transport Model Package for more information.	Draft DCO [Document Reference 3.1 (11)]  oTMPfC [Document Reference 7.14 (9)]  CoCP [Document Reference 6.3 ES Appendix 2.2 (9)]  Combined Modelling and Appraisal Report – Appendix B – Transport Model	Matter Not Agreed

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				Package [ <a href="#">APP-520</a> ]	
<b>Maintenance</b>  Operational staff traffic levels	2.1.52	SPC query the amount of traffic expected to the southern control centre as this route crosses a very busy multi-use public right of way.  SPC Update: Information provided so “Agreed” but led to other questions arising.	The tunnel will typically be controlled from the South East Regional Operating Centre, so the local tunnel control facility will be infrequently used. The South Portal Tunnel Services Building (TSB) above the tunnel portal will be used on a daily basis by Vehicle Recovery Service (VRS) and Traffic Officer personnel and by tunnel maintenance personnel as needed. VRS (one or two operatives) will recover broken-down vehicles from the road tunnels as necessary and the Traffic Officers will mostly be patrolling the road, but will use the TSB welfare facilities as required. Traffic Officers may also use the TSB access roads as a means of changing their direction of travel on the Project route. Routine tunnel maintenance is anticipated to be undertaken during overnight tunnel closures at one or other tunnel bore at six-week intervals.	N/A	Matter Agreed
<b>Impacts</b>  Southern portal tunnel entrance activities – WCH impact	2.1.111  DL6	How will priorities be decided in routine operation? i.e. The PROW should take precedence.  What will happen as regards use of the footpath when there is an emergency situation as otherwise there will be severance/long	The Applicant does not consider its maintenance activities would affect the use of the proposed WCH route daily. Therefore, the Applicant does not agree with Shorne Parish Council’s comment that the proposed WCH route would not be free-flowing.	CoCP [Document Reference 6.3 ES Appendix 2.2 (9)]	Matter Not Agreed

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		<p>diversions? Will there be control gates and diversions?  We are concerned about conflicts and WCH path use being compromised.  This matter is Not Agreed because the information about what would happen is not available.</p> <p>SPC Update: Somewhere in the documents we read that the PROW's would be gated off from the access road to the Portal Control room.  We can understand the safety reasons but it is nevertheless disappointing that this important WCH route will not be free-flowing.</p>	<p>The proposed WCH route would be a Public Right of Way (PRoW) and so the existing statutory procedures in relation to closing or stopping up PRoWs would apply.  With regard to emergency incidents during normal operations, the emergency procedures for PRoWs would be no different from the procedures in place to manage incidents across the road network including PRoWs. In the event of an incident occurring during the construction phase the appropriate response would be secured under the CoCP.</p>		
<p><b>Impacts</b></p> <p>Southern portal tunnel entrance activities – Maintenance</p>	<p>2.1.112</p> <p>DL6</p>	<p>There will be overnight tunnel maintenance every 6 weeks – we are concerned about noise nuisance to nearby residents from maintenance traffic and work.  This is Not Agreed because information about what mitigation may be required, and will be provided, is not known. Waiting</p>	<p>By the end of the construction, commissioning and handover stage of any part of the Project, the Contractors will have developed the Handover Environmental Management Plan (EMP) i.e. the third iteration of the EMP (EMP3). EMP3 will detail maintenance and monitoring activities throughout the operational phase having regard for the specific mitigation measures identified within the REAC as well as</p>	<p>CoCP  [<b>Document Reference 6.3 ES Appendix 2.2 (9)</b>]</p> <p>Draft DCO  [<b>Document</b>]</p>	<p>Matter Not Agreed</p>

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		for residents to complain is not a proactive approach to their needs.	operating procedures of National Highways, the local authority and local highway authority, this is set out in Section 6.13 of the CoCP.  Statutory nuisance proceedings can be brought under existing statutory processes. Noise nuisance associated with maintenance and construction activities will be covered by the controls and measures described in the CoCP or any environmental management plan approved under the draft DCO.	<b>Reference 3.1 (11)]</b>	
<b>Traffic</b>  Poor function of the northern connector road due to traffic overload	2.1.116  DL9A	Poor function of the northern connector road due to traffic overload:  <ul style="list-style-type: none"> <li>The northern connector road is vital to the functioning of the proposed layout changes but data in REP3-112 already shows it is routinely predicted to function at 95 or 98% capacity under "average" circumstances. Of course there is no such thing in practice as by definition, half of the time traffic volumes will be above average so congestion will be greater than average.</li> </ul>	Once the Lower Thames Crossing opens for traffic, there will be changes in how traffic flows across the region. These changes are set out in Chapter 7 of the Transport Assessment. In many places on the network, and notably at the Dartford Crossing, this would lead to significant beneficial impacts on both journey times and journey reliability. In some locations this change in road user decisions could lead to adverse impacts.  Overall, the benefits on the road network would outweigh the adverse impacts, and this is reflected in the positive economic benefit of the Project as a whole, and within each affected local authority area.  The Applicant does not agree with the Council's assertion that the volume of traffic	Transport Assessment <a href="#">[REP4-148 to REP4-152]</a>  ES Chapter 2: Project Description <a href="#">[APP-140]</a>	Matter Not Agreed



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		<ul style="list-style-type: none"> <li>A considerable and excessive volume of traffic will need to use the northern connector road, starting with all traffic on the A2 eastbound wanting to take the LTC as this joins and then diverges. This means that if there is a problem at the Dartford Crossing (as there will be) and additional traffic diverts to the LTC, access to the LTC and northern connector road so therefore Shorne, Shorne Woods Country Park and the A289 will be blocked.</li> <li>This scenario is also likely to block Gravesend East due to queuing on the A2 eastbound and ratrunning through the Gravesend East roundabouts to reach the LTC on-slip.</li> </ul> <p>It is unclear what can/would be done to improve this situation.</p>	<p>forecast to use the northern connector road would be “excessive”. The Project’s transport model does not forecast that the amount of traffic wishing to use the northern connector road would exceed the capacity proposed.</p> <p>The Applicant does recognise that on some sections of the northern connector road there is forecast to be a reduction in the speed of traffic in the locations where traffic would merge onto the connector road. The Applicant’s traffic modelling forecasts that this would be localised in nature and would not affect the operation of the connector road as a whole.</p> <p>The connector road is a safety feature that would reduce the risk of motorists coming into conflict while joining or leaving the A2. These are important as they are taking out A289 and local traffic from the A122 to M2 link. This would avoid traffic weaving in this section, i.e. vehicles changing lanes.</p> <p>As described in ES Chapter 2: Project Description, during operation the Project road and the variable mandatory speed limits would be managed by the Regional Operations Centre which would include the Tunnel Control Centre. The A122 and its approach roads would be managed on a day-to-day basis by the Applicant in accordance with its standards and procedures at the time. This would include</p>		

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			monitoring and managing situations where a section of the Project route may become blocked due to traffic queuing.		
<b>Impacts</b>  Loss of garage services on the A2	2.1.117  DL9A	We have concerns about the loss of the very busy Cobham south Esso service station. It is the only service station between Farthing Corner at Gillingham and the M25, on which service stations are then quite some distance away in each direction, and is the last service station on the westbound A2/M2 line before London.  It is particularly useful for traffic from Medway and for Shorne residents so will be a severe loss.  All remaining service stations are smaller, off-line lying north of the A2 and not that easy to reach.	There is no service station proposed as part of the Project.  National Highways has established a Roadside Facilities Working Group to encourage suitable new developments in areas of the network where there is a need.  This is a wider issue occurring on roads within and outside of the Project area and will be considered by National Highways Operational Directorate across the SRN.	N/A	Matter Not Agreed
<b>Charging</b>					
<b>Local Resident Discount Scheme</b>  Discounts for local residents	2.1.53	Residents have expressed that they will expect to get the same discounts/free tickets as residents of Dartford and Thurrock.  SPC update: Thurrock residents will get free use of both routes, Gravesham residents want the same as there will be times of closure and other situations when	Schedule 12 to the draft DCO contains the powers for the Secretary of State to provide a Local Residents Discount Scheme (LRDS) on the same basis as for the Dartford Crossing (for Thurrock and Gravesham).  SPC has confirmed they do not agree with the proposed Local Resident Discount Scheme as explained in their updated	Schedule 12 to the draft DCO <b>[Document Reference 3.1 (11)]</b>  Road User Charging	Matter Not Agreed

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		<p>they are forced to use the Dartford Crossing.</p> <p>It is not reasonable that, because Thurrock is a large and sprawling area, their residents get greater benefit than Dartford and Gravesham residents combined, which is the equivalent area south of the Thames. (Probably the original agreement is wrong, should have had e.g. a five mile radius limit.)</p> <p>A re-think on this matter is required as the previous agreement will be superseded by having two crossings close together. The previous agreement can be replaced.</p> <p>Therefore remains "not Agreed".</p>	<p>commentary, therefore the status of this has moved to Matter Not Agreed.</p>	<p>Statement <a href="#">[APP-517]</a></p>	
<p><b>Charging regime</b></p> <p>Variable charging</p>	2.1.54	<p>Concern about using charge alterations to manipulate routes taken by traffic that would not otherwise use the A2/M2 and connection routes from the M20.</p> <p>SPC Update: Response does not answer the point raised.</p>	<p>It is Government policy that major river crossings would normally be charged and therefore the Project is aligned with that policy. Charging would help manage demand and network performance across the existing Dartford Crossing and proposed Lower Thames Crossing. Charges at the new crossing would be equal in value to those in force at the Dartford Crossing.</p> <p>At Statutory Consultation in October 2018, the Applicant intended to seek 'flexible'</p>	<p>Road User Charging Statement <a href="#">[APP-517]</a></p>	Matter Not Agreed

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			<p>charging powers. However, further modelling assessments demonstrated that making the charges for the Project the same as for the Dartford Crossing would be the most beneficial option. Therefore, the Applicant’s approach evolved and at Supplementary Consultation in January 2020 the Applicant proposed to align charges and other details of the charging regime with those at the Dartford Crossing, such as hours in which the charges apply, discounts and exemptions. This means that road user charging at the Project would be based on the charging hours in place at Dartford, currently 06:00 to 22:00 every day, including weekends and bank holidays, with no charge applying for the overnight period.</p> <p>For more information about how the charges would be implemented and operated, see the Road User Charging Statement.</p>		
<b>Traffic and economics</b>					
<p><b>Modelling methodology</b></p> <p>Traffic modelling</p>	<p>2.1.55</p> <p>RRE</p>	<p>Great concern that traffic data used is old, mostly from 2014-2016, SPC do not believe the results can be correct or that the statistical methodology can be valid using such old data.</p> <p>The general view is that the traffic data lacks credibility.</p>	<p>The Applicant’s model is built in line with the Transport Analysis Guidance (TAG) (DfT, 2022) and standards as set out in the Design Manual for Roads and Bridges (DMRB). The Applicant is content that the data used in the transport model is acceptable, and the model has been assured by the Applicant’s independent</p>	<p>N/A</p>	<p>Matter Not Agreed</p>

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		Modelling only valid at regional level yet being applied to highly individual area.	assessor which has confirmed it is suitable to assess the impacts of the Project. While the model does include a range of detailed network parameters to reflect existing conditions, such a model can never reflect the conditions on every road, particularly those on the LRN.		
<b>Developments and uncertainty log</b>  Traffic Figures	2.1.56  RRE	<p>“Capping” of figures, on regional basis, also not statistically viable: The traffic figures used are not the actual product of the calculations but are modified (downwards), as they are not allowed to show predicted growth that is greater than a regional average figure.</p> <p>North-West Kent is a major growth area with great increase in housing (not all being factored into the plans, nor is the London Resort project) and therefore increased transport demands, baseline traffic is increasing greatly year on year (2.5% previously, probably more now) and the annual increase here must be at the high end of the regional range.</p>	The growth in the transport model is capped in line with DfT traffic forecasts. Growth in the area surrounding the Project is supplemented through developments which are under construction, that have a planning application or permission, in line with the TAG (DfT, 2022), and the overall growth in the area is constrained to the DfT traffic growth forecasts. Growth within Local Plans is not of sufficient certainty to be included explicitly in the model.	N/A	Matter Not Agreed

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		<p>If the model is correct then the output figures must be correct and should be used.</p> <p>Both the capped and uncapped figures should be published so that any underestimate is transparent and realised.</p> <p>This also impacts on the air quality figures, for which anticipated pollution will also be underestimated.</p> <p>'DfT's own documents warn against use of traffic prediction models.</p>			
<p><b>Modelling output interpretations</b></p> <p>Traffic data presentation</p>	<p>2.1.57</p>	<p>Data presentation is very selective and often obscures negative impacts while also disguising that benefits may be lower than desired, e.g. HGV reduction at Dartford Crossing.</p> <p>SPC Update: Simplicity of presentation (which is anyway not always the situation) was not the point, it was the selectivity, manner and non-comparability (between Consultations) of presentation which was criticised.</p> <p>As NH knows, we cannot discuss data with GBC and KCC because</p>	<p>Data as presented at consultations has to be shared in a manner that is manageable for the majority of consultees. The Applicant notes that this point is specifically about information shared during consultations in the development stage of the Project. It is therefore not considered appropriate to discuss this point further but the Applicant would like to note that it is not clear which data points were of concern.</p> <p>The Applicant has provided more detailed information to the local highway authorities (including Medway and KCC), as well as Gravesham Borough. As previously suggested, the Applicant recommends that</p>	<p>Localised Traffic Modelling  <a href="#">[REP6A-004]</a></p>	<p>Matter Not Agreed</p>

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		<p>NH have bound them with confidentiality agreements.</p> <p>SPC Final Update: Both GBC and KCC informed us independently that they were not permitted, by the terms under which the information was supplied to them by NH, to share the data.</p>	<p>the parish discusses the data with these authorities.</p> <p>The Applicant does not have any confidentiality agreements with Gravesham Borough Council (GBC) or Kent County Council (KCC). The Applicant recognises the need for certain stakeholders to understand traffic flows as a result of construction and operation of the Project. As set out in the Localised Traffic Modelling document, this has broadly included planning authorities, highway authorities, Transport for London and the operators of certain ports. The Applicant considers that it would be appropriate for the Parish Council to engage with GBC and KCC depending on the nature of their queries.</p>		
<p><b>Modelling methodology</b></p> <p>Traffic Modelling</p>	<p>2.1.58</p>	<p>Modelling versus reality: Choice of route is often a result of satnav's and human behaviour choices of wanting to keep moving. The likely outcomes of rat running and routes that drivers will use to get from other motorways through to the Project will cause severe traffic problems throughout the areas.</p>	<p>The Project's Transport Model has been independently assured by the Applicant as being suitable to assess the impact of the Project.</p> <p>The transport model has been calibrated and validated in line with relevant DMRB and TAG guidance as set out in the Transport Model Package (Appendix B of the Combined Modelling and Appraisal report). Given the scale and nature of the model it is not possible, or required, to achieve perfect validation across the whole of the modelled network.</p>	<p>Combined Modelling and Appraisal report Appendix B: Transport Model Package <a href="#">[APP-520]</a></p>	<p>Matter Not Agreed</p>

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			The conditions and operation of local roads has been replicated as far as possible within the parameters of the software.		
<p><b>Modelling methodology</b></p> <p>Data collection locations and quality (supplementary surveys 2019)</p>	<p>2.1.59</p> <p>RRE</p>	<p>Turning point surveys were not representative – e.g. the survey for Forge Lane (Shorne) was carried out during non-peak hours on a single Saturday in June 2019 whereas on normal weekdays there is a lot of traffic going to and from the School and other work destinations.</p> <p>The data collection point for Brewers Road was located between the current A2 slip roads and Park Pale (leading to Harlex haulage yard and the Rochester and Cobham Golf Club) and the entrance to the Country Park. Therefore the data collected does not represent vehicle use of Brewers Road itself as it continues on through Shorne. This may in part explain the difficulty we are having in marrying up our own data with HE's and we are therefore concerned about HE's possibly incorrect data being used to predict traffic volumes, and consequent noise and pollution in</p>	<p>The Applicant has clearly informed the Council that the data collected in 2019 was not used in the Project's transport model and that it was only used as part of the Applicant's assessment into the impacts on walkers, cyclists and horse riders as a result of the Project. This is described in paragraphs 13.3.27 to 13.3.29 in ES Chapter 13: Population and Human Health.</p> <p>The Applicant can also confirm that the 2019 data has not been used in any of the VISSIM modelling that has been used to develop or assess the Project.</p> <p>The Applicant is currently updating the Lower Thames Area Model (LTAM) to support the development of the Full Business Case which is required post any consent of the DCO application. No new data collection is being undertaken to support this.</p>	<p>ES Chapter 13: Population and Human Health  <a href="#">[APP-151]</a></p>	<p>Matter Not Agreed</p>



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		<p>residential roads accessed through this stretch of Brewers Road.</p> <p>* as at 13/07/22 agree with the purpose of the turning point data collection not being for general traffic volumes, however we still have concerns about the quality of the data.</p> <p>SPC Update: We are unclear whether this turning movements data was used for the VISSIM modelling of turning movements or whether this came from another data source.</p> <p>Also unclear whether any traffic counts have been re-measured (e.g. on Brewers Road – if so, please supply the dates of measurement) more recently as there has been discussion that LTAM is currently being updated.</p> <p>SPC Final Update: Lack of new/recent data being input into the updated LTAM assessment is a matter of concern. Source data for VISSIM assessments is unknown.</p>			

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<b>Wider Network Impacts</b>					
WNI approach  Wider Network Impacts mitigation on local roads	2.1.60	Traffic increases and lack of action to protect residents: Traffic will increase throughout the area on all roads both major and minor  Consequences are recognised but there are no plans included to address predictable problems from the outset, these should be integrated with project.	The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.  An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) was included in the application, providing information about the proposed traffic monitoring.	Wider Network Impacts Monitoring and Management Plan <b>[Document Reference 7.12 (2)]</b>	Matter Not Agreed
WNI approach  Wider Network Impacts mitigation  Traffic increases cannot be supported by local and wider network in North-West Kent	2.1.61	Traffic in the area is already heavy and bad and the proposals will make it worse by drawing more traffic into the areas.  Suggestions that the Project will cause reductions on small links are not credible as the Project will tend to pull new traffic by different routes, so cancelling out any putative reductions.	The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.  An updated Wider Network Impacts Management and Monitoring Plan	Wider Network Impacts Monitoring and Management Plan <b>[Document Reference 7.12 (2)]</b>	Matter Not Agreed

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			(WNIMMP) was included in the application, providing information about the proposed traffic monitoring.		
<p><b>Local WNI concerns</b></p> <p>Wider Network Impacts mitigation on A226, A227, A228 and A229</p>	<p>2.1.62</p> <p>RRE</p>	<p>Traffic increases on connecting roads between the M20 to the LTC: Concern about increased traffic on the A226, A227, A228 (and A229) and local connecting roads through rat-running.</p> <p>The M2 and A289 immediately east of the LTC are already at capacity with frequent jams, the LTC will only make this worse. The suggested solution is to impose lower than standard motorway speed limits, which is not a helpful solution or a successful outcome as it will increase journey times for all users.</p>	<p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) was included in the application, providing information about the proposed traffic monitoring.</p>	<p>Wider Network Impacts Monitoring and Management Plan [Document Reference 7.12 (2)]</p>	<p>Matter Not Agreed</p>
<p><b>Monitoring approach</b></p> <p>Long term Monitoring</p>	<p>2.1.63</p>	<p>Monitoring frequency and resolution of problems: The plan for monitoring of adverse outcomes proposes evaluation at 1y and 4y, this is much too long a gap so suggest 1y, 2y, 3y and 5y. How adverse outcomes identified by monitoring are going to get resolved is not clear. There will be problems where it is not</p>	<p>Monitoring would be conducted in the year before the Lower Thames Crossing opens to establish a baseline, then one and five years after completion of the Project.</p> <p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities related to the road network as a result of traffic growth or new third-party</p>	<p>Wider Network Impacts Monitoring and Management Plan [Document Reference 7.12 (2)]</p>	<p>Matter Not Agreed</p>

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		<p>physically possible to widen the roadway, and others where the source of funding is not clear or assured.</p> <p>Funding to resolve operational problems must be assured and resolution expedited.</p> <p>However there are also problems that are predictable, and those should be included within the project.</p>	<p>developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>An updated Wider Network Impacts Management and Monitoring Plan (WNIMMP) was included in the application, providing information about the proposed traffic monitoring.</p>		
<p><b>Local WNI concerns</b></p> <p>Future function of junctions that will be subjected to increased traffic volumes</p>	<p>2.1.118</p> <p>DL9A</p>	<p>Future function of junctions that will be subjected to increased traffic volumes:</p> <p>We have significant concerns about the future function of various junctions, which are already under stress yet are proposed to take additional traffic: Gravesend East, Shorne eastbound off-slip, M2J1:A289 among others.</p> <p>SPC Final Update: The issue here is being forced to take different routes that adversely impact on the junctions mentioned.</p>	<p>The Applicant recognises that as a result of the Lower Thames Crossing opening, people will choose to make different journeys. In many places on the network, and within Kent, this will lead to beneficial transport impacts on the network, and in some cases will lead to adverse impacts. Overall, the benefits on the road network outweigh the adverse transport impacts, and this is reflected in the positive economic benefit of the Project within Kent.</p> <p>The Applicant has identified the adverse impacts on traffic flows across the local road network, and this assessment is set out in the Transport Assessment.</p> <p>The Applicant is proposing to monitor the impacts of the Project on traffic on the local and strategic road networks. If the monitoring identifies issues or opportunities</p>	<p>Transport Assessment  <a href="#">[REP4-148 to REP4-152]</a></p> <p>Wider Network Impacts Management and Monitoring Plan  <b>[Document Reference 7.12 (2)]</b></p>	<p>Matter Not Agreed</p>

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			<p>related to the road network as a result of traffic growth or new third-party developments, then local authorities would be able to use this as evidence to support scheme development and case making through existing funding mechanisms and processes.</p> <p>The Wider Network Impacts Management and Monitoring Plan (WNIMMP) is included in the application, providing information about the proposed traffic monitoring.</p>		
<b>Socio-economics</b>					
<p><b>Community Facilities</b></p> <p>Loss of recreational space</p>	2.1.64	The area is losing (has now lost due to recent closure) its only, and very popular, "Pay and Play" golf course, this is not being re-provided.	<p>The Applicant proposes to permanently acquire the site for the new road and for landscaping. The Applicant is not proposing to replace the golf club, but instead to create a new parkland area on part of the site that would be open to the public after construction.</p> <p>The Applicant has assessed the impacts of the Project on the Southern Valley Golf Club as a community asset. This is covered by the Environmental Impact Assessment within the DCO application.</p>	ES Chapter 13: Population and Human Health <a href="#">[APP-151]</a>	Matter Not Agreed
<b>Traffic Effects on Business / Local Economy</b>	2.1.65	Increased traffic congestion and gridlock will have negative effect on economy and journey times	Given the widespread change in traffic patterns across the Lower Thames area it is impossible for the Applicant to provide commentary for every journey and route choice. The Ward Impact Summaries	Community Impact Report (Part 1 of 4) <a href="#">[REP2-032]</a>	Matter Not Agreed

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Increased journey times		Plans involve making some routes much longer and more complex.	(published during Community Impacts Consultation) provided detail of the forecast changes to traffic at a ward level once the Lower Thames Crossing is open and can be used as a means to assess the likely impacts upon journeys that individuals may take.  The Community Impact Report provides a summary by electoral wards that would have part of the Project (temporary and permanent) within them.		
<b>Traffic Effects on Business / Local Economy</b>  Access to stations and amenities	2.1.66	There will be reduced and much more indirect access to stations, supermarkets, and other shopping locations.  SPC Update: Regarding stations, this point was about extra difficulty of getting to the same stations that are used currently (e.g., HS1 at Ebbsfleet International), which are not the ones that the Applicant discussed. If a resident needs to get to Ebbsfleet International then it is not welcome to have that journey made more difficult for their daily commute. The other items are self-explanatory as use	The Applicant recognises that people will travel to different stations to complete their journeys, much as they would take different roads depending on their origin and destination, as well as the purpose of their trip. Given the widespread change in traffic patterns across the Lower Thames area it is impossible for the Applicant to provide commentary for every journey and route choice. The access to station information as set out in the Community Impacts Consultation refers to the immediate access to these stations and impacts on the rail services at these stations. The Ward Impact Summaries (published during Community Impacts Consultation) provided detail of the forecast changes to traffic at a ward level once the Lower Thames Crossing is open and can be used as a means to assess the	Community Impact Report (Part 1 of 4) <a href="#">[REP2-032]</a>	Matter Not Agreed

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		the same routes, which will be longer and more difficult.	likely impacts upon journeys that individuals may take. The Community Impact Report provides a summary by electoral wards that would have part of the Project (temporary and permanent) within them.		
<b>EIA methodology</b>					
<b>Assessment methodology</b>  Timing and extent of water surveys	2.1.67	Several of the water surveys and studies were only carried out in the driest months of the year, e.g. looking for streams, and the water flow tests at Chalk, this raises questions about the veracity of results obtained.  SPC are not aware of any flow tests having been conducted between land south and north of the A226 just east of Chalk Church, which is an area of concern regarding dewatering that might be caused by excavations.  SPC Update: Only some of the surveys, and very few/none south of the Thames, were carried out in all seasons.	More information is provided in the Water Features Survey Factual Report. This includes surveys of the area of concern and was carried out in four phases of field work that spanned all times of the year.	ES Appendix 14.2: Water Features Survey Factual Report <a href="#">[APP-454]</a> and <a href="#">[APP-455]</a>	Matter Not Agreed
<b>Assessment methodology</b>	2.1.68	The Project doesn't consider negative impact on all land that will suffer air pollution, e.g. the	The assessment of effects from changes in air quality follows the published standard in the DMRB LA 105 Air Quality (Highways	N/A	Matter Not Agreed

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Other Impacted land		Parish owns "Crabbles Bottom" which is close to the M2/A289 junction but there has been no discussion about impact on our land e.g. productive orchards and meadow. SPC Update: Crabbles Bottom has been passed over on charts, it is not coloured in, whereas the highest pollution levels can be seen to have reached the southernmost part of Great Crabbles Wood.	England, 2019). This sets out the criteria for inclusion in the assessment, listing those designated sites to be considered, distances from the affected road network, and thresholds of changes in nitrogen deposition above which sites are screened in for further assessment. If the areas listed above meet those criteria, they will have been included as part of the assessment which supports the DCO application.		
Assessment methodology	2.1.69	Some assessments are subjective, i.e. opinion and value judgements rather than being objective assessments based on properly collected and evaluated, well evidenced hard data.  SPC Update: It is reasonable to expect, for a project of this size and cost, that data would all be objective/measurement based.	ES Chapter 4 EIA Methodology and the topic chapters of the ES fully justify the methods of assessment.	ES Chapter 4: EIA Methodology [ <a href="#">APP-142</a> ] and the topic chapters of the ES [ <a href="#">APP-139</a> to <a href="#">APP-154</a> ]	Matter Not Agreed
<b>Air quality</b>					
Assessment methodology  Traffic data	2.1.70	Interdependence on correct traffic data: As discussed above, there are considerable concerns and doubts over the veracity of the	The Applicant has produced a suite of documentation setting out how the model has been built and how it performs (see the Combined Modelling and Appraisal Report	Combined Modelling and Appraisal Report and its	Matter Not Agreed



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		<p>traffic data. However, as the same capped data provides the input into the air quality predictions, if the traffic data is incorrectly low so will be the air quality predictions.</p> <p>Predictions use outputs from the traffic modelling and reconvert them into AADT rather than using actual AADT inputs.</p>	<p>and its appendices A, B and C). This includes details of the guidance and standards the Applicant is required to use (including the TAG (DfT, 2022) and the DMRB), given the Project is to be funded by the Government. The model has been assessed by the Applicant's independent assessor and has been accepted as suitable for assessing the impact of the Project on the highway network.</p>	<p>appendices A, B and C [<a href="#">APP-518</a> to <a href="#">APP-523</a>]</p>	
<p><b>Assessment methodology</b></p> <p>Traffic data</p>	2.1.71	<p>Over-manipulation of data: The air quality report is prefaced by descriptions of a considerable number of ways that figures have been adjusted, usually downwards, which casts doubt on the whole exercise.</p> <p>In some instances data for particular major roads was individually adjusted.</p> <p>Predictions that air quality will improve on the A2 immediately west of the LTC (close to the major junction) are not credible as additional traffic will be pulled from the west to use the LTC cancelling out any possible reduction through westbound traffic instead taking the LTC.</p>	<p>The air quality assessment is undertaken in accordance with DMRB LA 105 (Highways England, 2019) and local air quality management technical guidance (Defra, 2016). This is consistent with how local authorities assess air quality as part of their local air quality management process.</p>	<p>ES Chapter 5: Air Quality [<a href="#">APP-143</a>]</p>	Matter Not Agreed

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<p><b>Assessment methodology</b></p> <p>Inclusion of factors for junctions, long inclines etc</p>	2.1.72	<p>The earliest air quality calculations that were published only related to straight, flat roads.</p> <p>Assurance is needed that the figures factor in large junctions and especially that there is a 2km long, 4% incline slope which HGV's (the heaviest polluters) will haul up from the lowest point of the tunnel. Pollution calculations could be underestimated for this reason as well.</p> <p>SPC Update: The "study area" is vast, with inclusion of data from distant points masking adverse effects close to the actual LTC roads.</p>	<p>Detailed dispersion modelling has been undertaken in accordance with DMRB LA 105 guidance (Highways England, 2019), which states the requirements for detailed modelling. Speed band emission factors have been used to determine the emission factors for each link, including slip roads and junctions. It should be noted that the air quality model has been extensively calibrated against air quality monitoring data from 260 individual sites across the study area, to ensure that the model predictions are robust.</p>	<p>ES Chapter 5: Air Quality <a href="#">[APP-143]</a></p>	Matter Not Agreed
<p><b>Assessment methodology</b></p> <p>Data presentation</p>	2.1.73	<p>Data presentation was only at either simple or PhD level, there needs to be an intermediate level of presentation that can be understood by non-experts with reasonable ability to understand technical information.</p> <p>The point here was about different readers having different capacities to understand the material. SPC's view is that the</p>	<p>To support the technical ES chapters, the ES Non-Technical Summary provides a summary of the potential impacts and proposed mitigation. The Community Impact Report help readers understand the impacts of the Project at a local community ward level.</p> <p>The Applicant undertook the Community Impacts Consultation to directly address concerns raised by local authorities, including Gravesham Borough Council, that</p>	<p>ES Non-Technical Summary <a href="#">[APP-486]</a> Community Impact Report <a href="#">[REP2-032]</a>, <a href="#">[REP2-034]</a>, <a href="#">[REP2-036]</a>, <a href="#">[REP2-038]</a></p>	Matter Not Agreed

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		ward level presentation disguises the impacts in the most severely affected area. Therefore this matter is Not Agreed.	further consultation was required prior to submission of the DCO application to engage with local communities and explain the impacts.		
<b>Assessment methodology</b>  Sampling methodology	2.1.74	Air quality sampling was undertaken mostly using NO2 diffusion tubes but these are known to be more unreliable and give lower readings than fixed sampling stations. Therefore the calculations could be also underpredicting for this reason.	A combination of diffusion tubes and automatic analysers has been used to verify the air quality model. While it is acknowledged that diffusion tubes are not as accurate as automatic monitoring stations, it is not possible to undertake large-scale monitoring campaigns using automatic stations given both cost and infrastructure required to power the stations.	ES Chapter 5: Air Quality <a href="#">[APP-143]</a>	Matter Not Agreed
<b>Assessment methodology</b>  Sampling points	2.1.75	Air quality sampling is not being undertaken at points where people live close to a road where traffic levels are predicted to rise as a consequence of the project, e.g. the A227 at Meopham and the A228 at Cuxton.	The assessment has been informed by air quality monitoring obtained from an extensive area, which includes areas where the highest pollutant concentrations and traffic impacts are expected as a result of the Project. There are numerous air quality monitoring sites on the A227, A228 and A229 as shown in ES Figure 5.4: Air Quality Monitoring Sites.	ES Figure 5.4: Air Quality Monitoring Sites <a href="#">[APP-175]</a> to <a href="#">[APP-177]</a>	Matter Not Agreed
<b>Assessment of likely significant effects</b>  Creation of new exceedances of regulatory levels,	2.1.76	Unclear legality of creating new exceedances, cannot be justified or offset by reductions 10m away. If air pollution is being caused by the project then those locations should be included in the project,	The air quality assessment has been undertaken in accordance with DMRB LA 105 (Highways England, 2019) which presents the methodology to determine whether the impacts on air quality are considered significant. Although the assessment has concluded that there are no significant impacts, the Project has	ES Chapter 5: Air Quality <a href="#">[APP-143]</a>  Health and Equalities Impact	Matter Not Agreed

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and other deterioration in air quality		<p>it is unacceptable to ignore adverse effects on human health.</p> <p>There are some areas which already have exceedances and will be made worse by the project but for unknown reasons have not been declared as AQMA's, this should be done and those areas included in the project and to have planned actions to reduce pollution.</p> <p>It has been stated that a greater number of locations will be newly subjected to bad pollution levels than those who may have their air quality levels improved.</p> <p>Greater number of residential locations will be affected badly than reduced.</p>	<p>investigated whether there are any mitigation measures that could be put in place to reduce the impacts of the Project on the A228. Unfortunately, the Applicant has not been able to reduce the Project's impacts in that area. It should however be noted that the Applicant considers that the model could be overestimating the concentrations of NO<sub>2</sub> at receptors along the A228. The model indicates that air quality currently exceeds AQS objectives and the Applicant has had discussions with the local authority as part of the assessment process as the area has not been designated an air quality management area and the Applicant is unaware of any plans to designate any AQMA on the A228.</p> <p>The Health and Equalities Impact Assessment provides more information specifically on air quality and human health.</p>	<p>Assessment <a href="#">[REP7-144]</a></p>	
<p><b>Assessment of likely significant effects</b></p> <p>Impact on local woodlands and parks</p>	<p>2.1.77</p> <p>RRE</p>	<p>Pollution will spread further into the parks and Ancient Woodlands, and further up the tree trunks than is presently the case. There is little point having Country Parks which are then so contaminated that their biodiversity is compromised.</p>	<p>Within the Guide for Local Refinement Consultation (Chapter 5), the Applicant provided an update on how it is assessing nitrogen emitted from vehicle exhausts onto designated habitats (process called nitrogen deposition). The guide identified which designated sites e.g. ancient woodland, veteran trees, Ramsar sites, SSSIs, SPAs and SACs etc., were likely to be significantly affected by nitrogen deposition; and explained the mitigation measures</p>	<p>ES Chapter 5: Air Quality <a href="#">[APP-143]</a></p> <p>ES Chapter 8: Terrestrial Biodiversity <b>[Document Reference 6.1]</b></p>	<p>Matter Not Agreed</p>

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			considered and the proposed compensatory habitat areas, which would offset the emissions by planting new habitats and enhance existing sites. Further details on the assessment are included in ES Chapter 5: Air Quality and ES Chapter 8: Terrestrial Biodiversity.	<b>ES Chapter 8 (2)]</b>	
<b>Assessment methodology</b>  Air quality assessment criteria	2.1.78	Appropriate assessment criteria for rural areas with low property numbers: The significant effect criteria assessment considered number of properties, concluding no risk if very few properties were affected, but with low numbers of properties in rural areas, this artificially downplays the problem. E.g five properties sounds insignificant but there is a great difference in impact between 5/1000 compared to 5/5, i.e if all the properties in a particular low density area are adversely affected.	Air quality modelling has been undertaken at worst-locations/properties where air pollutant concentrations and impacts are expected to be greatest, following the advice of DMRB LA 105 (Highways England, 2019). All properties considered to be at risk of exceedances of Air Quality Strategy objective thresholds for human health were included in the model. Paragraphs 5.2.88 to 5.3.93 of ES Chapter 5: Air Quality describe how the human receptors (such as properties) were selected.	ES Chapter 5: Air Quality <a href="#">[APP-143]</a>	Matter Not Agreed
<b>Assessment methodology</b>  Pollution assessment in future years after opening	2.1.79  RRE	Assessments were made only for opening year but air pollution related to traffic and traffic volumes are predicted to increase, therefore so will pollution.	The Project air quality monitoring survey has been undertaken over a period of 12 months, other than two sites where monitoring was undertaken over a period of eight months. Table 1.1 in ES Appendix 5.1: Air Quality Methodology, outlines the monitoring periods for the Project-specific	ES Appendix 5.1: Air Quality Methodology <a href="#">[APP-345]</a>	Matter Not Agreed

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		Arguments that more vehicles will be electric are not really quantifiable and predictable, especially for long-distance HGV's and rural residents, and these vehicles will still cause pollution of air, and noise pollution, from tyres and brakes.	monitoring sites. Where the monitoring period was less than 12 months, the data was annualised following Local Air Quality Management Technical Guidance (TG16) (Defra, 2016), in order to ensure the concentrations were representative of long-term average concentrations. The baseline monitoring survey methodology is described in ES Appendix 5.1.		
<b>Assessment of likely significant effects</b>  Tunnel ventilation system	2.1.80	Concern that particularly bad air will be pushed out of tunnel mouth, without any cleaning, and impact on residential areas due to variable wind direction	The impact of the tunnel portals on receptors such as houses has been assessed and there is no need to add filtration to reduce the effects of pollution from the tunnel.	N/A	Matter Not Agreed
<b>Cultural Heritage</b>					
<b>Heritage assets</b>  Impact on ancient buildings	2.1.81	Concern for St Mary's Church, Chalk which is very close to the tunnel mouth and could be affected by increased noise and vibration and through nearby dewatering.	To reduce impacts in Chalk Ward, the southern entrance of the tunnel has been moved, in line with community feedback, further south out of the ward. The tunnel was extended 600 metres after the Applicant's Options Consultation in 2016 and by an additional 350 metres after Statutory Consultation in 2018, lengthening the tunnel by a total of 950 metres and moving it away from Chalk village.	N/A	Matter Not Agreed
<b>Archaeology</b>	2.1.82	Finds should be photographed and available online, exhibited	The Archaeological Mitigation Strategy and Outline Written Scheme of Investigation includes provision for outreach and	ES Appendix 6.9: Draft Archaeological	Matter Agreed

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Access to archaeological findings		locally not all taken off to a distant University archive.	community engagement. This will be further developed in consultation with heritage stakeholders.	Mitigation Strategy and Outline Written Scheme of Investigation [Document Reference 6.3 ES Appendix 6.9 (6)]	
<p><b>Assessment methodology</b></p> <p>Additional archaeological investigations are needed</p>	<p>2.1.119</p> <p>DL9A</p>	<p>Additional archaeological investigations are needed:</p> <p>Several areas within the order limits have not had archaeological investigations undertaken, such as Southern Valley Golf Course, land south of Shorne Ifield Road, and the two areas of NOx deposition mitigation land in Shorne Village.</p>	<p>The Applicant is aware that further archaeological work is required within Shorne, and this is being discussed with Kent County Council (KCC) as the local authority archaeological advisors.</p> <p>The desk-based study for the whole Project, the geophysical survey on most of the land, including the Southern Valley Golf Course, and the results of the extensive archaeological trial trenching indicate the presence of archaeological sites south of the Shorne Ifield Road and the Southern Valley Golf Course. In particular these include prehistoric enclosures, ditches and trackways representing a settled farmed landscape in the later Bronze and Iron Ages. Mitigation developed with KCC will mostly be archaeologically trial trenched and strip map and sample excavation with some areas of detailed archaeological excavation. KCC have also suggested that the Applicant could tackle the opportunity to</p>	N/A	Matter Agreed

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			<p>carry out field walking and controlled metal detecting. The majority of the settlement at this period is focussed around known sites mostly to the north of the Shorne lfield Road outside of the Project, but does include the multi period site that was trial trenched in 2020; if this site is still impacted by the Project it will be subject to a detailed archaeological excavation. Within the Roman Period there is some evidence for settlement to the immediate south of the Southern Valley Golf Course. This area will require archaeological trial trenching before further archaeological work. The two areas of NOx will be surveyed using geophysics in 2023; a Written Scheme of Investigation (WSI) for the work has been submitted to KCC for approval and further work will be developed based on the results.</p> <p>All the archaeological work has to be agreed with KCC who will monitor and sign-off any field work and the results made available.</p>		
<b>Landscape and visual</b>					
<p><b>Plants &amp; Woodlands</b></p> <p>Extent of damage to protected land,</p>	2.1.83	<p>An objective of the project is to minimise adverse impacts on (health and) the environment but the location chosen is one of maximal damage or threats to Ancient Woodland, SSSI's,</p>	<p>Since the Preferred Route Announcement in 2017, the Applicant reappraised its routeing decisions and considerations of alternatives. This work continues to conclude that the preferred route was the most sensible.</p>	<p>Need for the Project  <a href="#">[APP-494]</a></p>	<p>Matter Not Agreed</p>



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and "minimisation"		SPA's, Ramsar Site, landscape areas and Shorne Woods Country Park (the most visited park in Kent). "Minimise" is a "weasel word" that should be avoided as e.g. damage that is reduced from 100% to 99.9% can be said to have been minimised if all possible reduction measures have been applied yet there is no discernible difference.	The Need for the Project sets out how the identification, selection and design process has responded to the Scheme Objectives and how a collaborative engagement process has been used to inform the proposed Project. Reducing the impacts of the Project on the environment is one of the Project requirements (see Need for the Project). At every step of the Project's lifecycle, consideration has been given and efforts have been made to reduce the environmental impacts, while still fulfilling the needs of the Project. The Applicant has followed the mitigation hierarchy of 'avoid, minimise, restore and compensate' to protect the environment in which it would be situated and in keeping with industry best practice.		
<b>Impacts</b>  Light pollution increase	2.1.84	The area is presently completely dark but will be lit at night causing light pollution for nearby residents and in the landscape, particularly as the screening by trees that we requested has been removed from plans. SPC Update: "Minimise" is such a weasel word.	The Applicant clarified in paragraph 6.8.3 of the CoCP that lighting will be designed, positioned and directed to prevent or minimise light disturbance to nearby residents, ecological receptors, as well as motorists and rail and marine operations. This provision will apply particularly to sites where night working or security lighting will be required.	Code of Construction Practice (CoCP) [Document Reference 6.3 ES Appendix 2.2 (9)]	Matter Not Agreed

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		The facts remain that a landscape that it presently very dark will not be so in future with the LTC.			
<p><b>Infrastructure/Landscape Integration</b></p> <p>New structures with negative visual impact</p>	2.1.85	<p>75m pylon – In order to get electricity cables across the width of the LTC, an unscreened 75m pylon will be installed with great visual impact.</p> <p>50msq electricity substation – having given us Chalk Park, actually only in order to reduce need for spoil removal, a very large electricity substation was announced within and nearby it which will impinge on local ambience and new views.</p> <p>SPC Update: Unclear what screening will be effective in hiding a 75m pylon.</p> <p>We were told that the substation would be surrounded by bunds and planting so hidden from view, except of course from Chalk Park itself as has raised land. However experience of such substations is that they are highly visible and therefore a blot on the landscape.</p> <p>SPC would like to see profiles including the view from Chalk Park because the 17m mound will</p>	<p>The Applicant acknowledges that screening the proposed 75m pylon from all areas would not be possible. However, the Applicant has proposed planting mitigation to soften the views and provide some screening from certain viewpoints.</p> <p>Screen planting can be effective when placed in foreground views close to the viewer, for example, adjoining the proposed footpath in the vicinity of Representative Viewpoint (RV) S-24. ES Appendix 7.10 provides a commentary on visual impact from RVs, for example, from RV S-27 within the Shorne, Cobham and Luddesdown ward, where it is considered that the replacement overhead line within Claylane Wood, including the taller pylon, would not notably change the existing view given the presence of existing pylons.</p> <p>ES Figure 7.19 Photomontages Winter Year 1 and Summer Year 15 (2 of 4) Viewpoint S-25 Sheet 2 of 4 and Sheet 4 of 4 show a RV of the proposed overhead line and pylons in the Shorne, Cobham and Luddesdown ward.</p> <p>Proposed planting, the creation of Chalk Park and the return of the wider landscape</p>	<p>Project Design Report – Part F – Structure and Architecture <a href="#">[APP-513]</a></p> <p>ES Appendix 7.10: Schedule of Visual Effects <b>[Document Reference 6.3 ES Appendix 7.10 (2)]</b></p> <p>ES Figure 7.19 Photomontages Winter Year 1 and Summer Year 15 (2 of 4) <b>[Document Reference 6.2 ES Figure 7.19 2 of 4 (3)]</b></p> <p>Design Principles <b>[Document</b></p>	Matter Not Agreed

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		<p>mean that any screening is overlooked so the electricity substation will be visible.</p>	<p>to its former agricultural state would help integrate the new route into the surrounding landscape. The planting would screen views of the proposed electricity substation, which is situated on the southern side of the A226 by the South Portal and is part of the proposed permanent above ground infrastructure. Landscaped earth berms have been proposed, so the substation sits more contextually within the adjacent landscape. This is described in more detail in paragraph 4.4.17 of the Project Design Report – Part F – Structures and Architecture.</p> <p>The substation landscape mounding is secured at Design Principle S3.16. Furthermore para 5.12.8 of the oLEMP states: "<i>A substation and rendezvous point have been designed off the access road, located near the vicinity of existing barns and farm buildings. The substation and rendezvous point will be integrated and screened from the wider landscape by a mixture of earthworks and woodland planting.</i>" The proposed planting on the landscape mounding is shown on the Environmental Masterplan (Section 3 Sheet 3) and would comprise woodland edge planting, further details of which can be found in Annex A of the Design Principles. The proposed substation does not feature in</p>	<p><b>Reference 7.5 (7)]</b></p> <p>Environmental Masterplan  [<b>Document Reference 6.2 ES Figure 2.4 Sections 1 and 1a (4), Section 2 (5), Section 3 (4), Section 4 (2), Section 9 (6), Section 10 (4), Section 11 (3), Section 12 (3), Section 13 (3), Section 14 (3)]</b></p> <p>oLEMP  [<b>Document Reference 6.7 (7)]</b></p>	

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			<p>any of the photomontages produced for the DCO application.</p> <p>The oLEMP is part of a suite of documents that capture the Project's landscape and ecology design and environmental commitments. These documents are referred to as 'control documents' and include commitments to achieve the mitigation detailed in the ES and HRA. The control documents are legally secured through Requirements set out in Schedule 2 of the DCO.</p>		
<p><b>Mitigation</b></p> <p>Restoration of land post works – quality</p>	2.1.86	The documents state that land will be restored to the satisfaction of the landowner, but it also needs to be to the satisfaction of the Parish and Borough Councils	<p>The Applicant would be required to restore this land to its pre-existing state. The landowner would not need any additional consents from the local planning authority or parish council to keep the land in this state. It is therefore not appropriate for those councils to be required to approve the restoration of the land to this state.</p> <p>It will be restored to the landowner's reasonable satisfaction and compliant with legal requirement.</p>	N/A	Matter Not Agreed
<p><b>Plants &amp; Woodlands</b></p> <p>Maximisation of hedges and</p>	2.1.87	In early plans there were plenty of hedges in the compensation land, going back to the original small field landscape of the early 1800's. These then disappeared later with instead a very open landscape proposed which	Where possible, reinstatement of historic hedgerows has been designed into the landscape, especially where it has coincided with the boundaries of the Project. Examples are the access road from the A226 to the South Portal, which has reinstated historic land and hedgerow	Outline Landscape and Ecology Management Plan <b>[Document</b>	Matter Not Agreed

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ponds for biodiversity		<p>provides less habitat and screening. Hedges, of mixed native species, should be maximised.</p> <p>Ponds are also important and should be provided where possible and they can be permanent.</p> <p>SPC Update: It would be preferable for existing hedges and scrub habitat to be retained and incorporated into plans. The point is not just provision but to maximise hedge provision.</p> <p>This matter is not agreed on the basis that the amount of hedges and screening has been reduced and SPC feel that this is important for residents in reducing noise and air pollution.</p>	<p>planting. Open mosaic habitat is a mixture of open grassland, scrub, bare ground and ponds. The proposed details for management of this area are included in the outline Landscape and Ecology Management Plan (oLEMP). The aim is to provide a diverse habitat for biodiversity.</p> <p>There are a number of drainage ponds associated with the Project, as well as retention ponds and infiltration basins. These form part of the Project’s proposed drainage strategy, and their primary function would be to provide drainage attenuation during the operational phase of the Project. Although they would develop into a habitat of benefit to wildlife, they do not form part of the ecological mitigation for the Project. A planned maintenance system would be established to ensure that the drainage system operates effectively.</p> <p>Where waterbodies are lost, these are replaced as part of the ecological mitigation proposals and would be managed with the primary function as a biodiversity resource. New ponds are proposed along the route of the Project, some of which are integral to the mitigation strategy for great crested newts.</p> <p>South of the River Thames, habitat creation would include woodland planting, to reduce the impact for the loss of ancient and SSSI</p>	<p><b>Reference 6.7 (7)]</b></p>	

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			woodland during the construction of the Project, as well as areas of species-rich grassland, scrub, bare ground and ponds. These are designed to both provide new, high-quality habitats as well as connect existing areas of biodiversity value.		
<b>Mitigation</b>  Preservation of existing habitat	2.1.88	Residents are concerned that existing good wildlife habitat may be bulldozed when it might better be incorporated into the plans.	The Project is designed to maximise biodiversity value wherever possible. The biodiversity value generated by the Project is described in ES Chapter 8: Terrestrial Biodiversity and set out in detail in Appendix 8.21: Biodiversity Metric Calculations.	ES Chapter 8: Terrestrial Biodiversity <b>[Document Reference 6.1 ES Chapter 8 (2)]</b>  ES Appendix 8.21: Biodiversity Metric Calculations <a href="#">[APP-417]</a>	Matter Not Agreed
<b>Terrestrial biodiversity</b>					
<b>Assessment</b>  Nitrogen deposition methodology	2.1.89	Quantitative and qualitative means are needed to identify how much compensation and mitigation and Nox offset land is needed, and to confirm it has been provided: It is unclear to us whether or not the acreage of land identified is correct.	The methodology for identifying suitable areas for nitrogen deposition compensation is listed within the Project Air Quality Action Plan. This sets out why land was included and excluded for further consideration, and why the final sites were identified for inclusion as part of the Project application.	ES Appendix 5.6: Project Air Quality Action Plan <a href="#">[APP-350]</a>  ES Chapter 5: Air Quality <a href="#">[APP-143]</a>	Matter Not Agreed

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		<p>It is not just area that is important but the degree of ecological enhancement that will occur.</p> <p>It does not make sense to e.g. take existing grazing land, relabel it as mixed mosaic grassland and then claim it to be compensation land for the LTC. That area already existed and the ecological enhancement is small.</p>	<p>Further details on the assessment are provided in ES Chapter 5: Air Quality and ES Chapter 8: Terrestrial Biodiversity.</p>	<p>ES Chapter 8: Terrestrial Biodiversity  [Document Reference 6.1 ES Chapter 8 (2)]</p>	
<p><b>Mitigation</b></p> <p>Permanence of compensation and mitigation and Nox offset land, safeguarding against future development</p>	2.1.90	<p>If land is taken for compensation and mitigation and Nox offset then this must be permanent.</p> <p>Great concerns that if management of the land is vested in local authorities (GBC and KCC) it might later be magically declared redundant and sacrificed for development, against the original principles of its acquisition.</p> <p>SPC Update: It wasn't NH applying to build on mitigation land that is a concern but depends on which organisation becomes in charge of the land later, and the clauses in the agreement under which they take such land on. Restrictions have to be permanent.</p>	<p>The Applicant will be responsible for long-term management and maintenance of environmental mitigation unless it is agreed with a third party (usually another statutory body, such as Natural England, Forestry England, etc) for them to manage at a later date.</p> <p>The Applicant has set out the proposed management of the landscape and ecological elements of the Project in the outline Landscape and Ecology Management Plan (oLEMP).</p> <p>Any parcels outside of the highways operational boundary may be managed by agreement with third-party experienced stakeholders as described in paragraph 4.1.7 of the oLEMP.</p> <p>The oLEMP also sets out an advisory group that will be set up to:</p> <ul style="list-style-type: none"> <li>• Inform decision making</li> </ul>	<p>Outline Landscape and Ecology Management Plan  [Document Reference 6.7 (7)]</p>	Matter Not Agreed

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		<p>There isn't any assurance that mitigation and compensation land will be protected from changing usage and future development once handed over to management partners.</p> <p>This matter is not agreed because we have concerns about who will manage these sites and whether their primary interest is nature conservation.</p>	<ul style="list-style-type: none"> <li>Assure and oversee the implementation of commitments made to stakeholders</li> <li>Review monitoring outputs, ensure successful achievement of objectives and that measures of success have been achieved</li> </ul> <p>The Applicant will not apply for planning consent for change of use of those environmental mitigation areas as the deviation from what is secured in the DCO would be a criminal breach of control for the Applicant.</p> <p>Any future development outside the land required to construct, operate and maintain the Project would be decided by the relevant local planning authority or other relevant approval body. For more information about local authority aspirations for future development, refer to their relevant local plans.</p>		
<b>Marine biodiversity</b>					
<b>Impacts</b>	2.1.91	Construction phase – Plans have variously included a construction water outflow along the “Ramsar Ditch” (part of the Ramsar Site), into the North Kent Marshes SPA and out into the Thames – detail of this remains vague.	For the construction phase, it is proposed to discharge water to a ditch located north of Lower Higham Road. The quantity and quality of this discharge would be subject to regulation by the Environment Agency through an environmental permit. In line with current legislation, the Project would be required to meet the water quality and	N/A	Matter Agreed
Contaminated water discharges into the Thames	RRE				



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		<p>Operational phase – Remains unclear where drainage of contaminated water from the road and tunnel will be pumped from and to, and whether there will be any discharge into the Thames, and of what quality of water. As the Thames is tidal here, contamination can hang around for significant time. We accept the operational drainage answers, based on what is stated in DCO documents but have ongoing concern that severe rainfall events could cause exceedance of capacity. SPC confirms this point has been clarified about operational drainage which will go to settlement ponds.</p> <p>SPC Update: It isn't "a" ditch but the "Ramsar ditch", part of the Ramsar site – presumably included in the Ramsar Site due to hydrological importance.</p> <p>Concern that plans include a large settling pond to prevent chalk entrainment fines so chalk will be introduced into the soil in an area of marshland. Location of chalk settlement ponds has been</p>	<p>discharge volume conditions stipulated by the environmental permit.</p> <p>During operation it is not proposed to discharge any Project drainage directly into the Ramsar site or SPA. Operational drainage comprises a mixture of infiltration to ground and attenuated, treated discharges to surface watercourses. An assessment of the operational drainage proposals has been completed and is presented within the ES. This includes an assessment of the potential effects on surface and groundwater quality and levels.</p> <p>The tunnel will have an integrated drainage system which will ensure the collection and treatment of tunnel drainage prior to discharge into the River Thames under high tide conditions. In line with current legislation, this discharge would be subject to an environmental permit.</p> <p>The Applicant has provided signposts to more information about the area of land queried near Great Clane marsh. The rectangular area (Plot 14-01) being questioned is the reception pit area for the directional drill, which allows space for plant and equipment. There would not be any structures, just temporary use.</p>		

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		<p>clarified but overspill is still a concern.</p> <p>Plans show rectangular areas close to housing, what are they? If there are pumps or other machinery they could obstruct views and cause noise problems.</p> <p>Great Clane marsh often floods in winter and with very high tides, how will that affect/be affected by what is proposed? The aspect of the rectangular areas is agreed but we would like to see further detailed information in documents.</p>			
<b>Noise and Vibration</b>					
<p><b>Assessment of likely significant effects</b></p> <p>Future traffic noise reductions claims</p>	2.1.51	<p>Some claims of noise reduction seem not credible, especially versus loss of mature trees e.g.in the A2 central reservation, allegedly this will result from use of special road surfaces. Guarantees are needed over any improvements being maintained and of actions if shown not to be the case.</p> <p>SPC Update: We still consider that the noise predictions are not credible.</p>	<p>The Project design has sought to incorporate noise mitigation by means of earthwork features where practicable. The multidisciplinary iterative design process considered the potential for adverse impacts of each specific design measure having regard for noise, landscape and visual, soils, construction and engineering limitations, to identify a combined and deliverable design. The noise mitigation considered and discounted is described in 6.3 Environmental Statement - Appendix 12.10 - Road Traffic Noise Mitigation and Cost Benefit Analysis. The noise</p>	<p>REAC within the Code of Construction Practice [Document Reference 6.3 ES Appendix 2.2 (9)]</p> <p>ES Appendix 12.10: Road Traffic Noise Mitigation and Cost Benefit</p>	Matter Not Agreed

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		<p>No acoustic barriers are proposed south of the river, and more bunding is both possible and needed. Low noise surfaces deteriorate over time, and any repairs need to be in the same materials.</p>	<p>assessment and mitigation measures considered are in accordance with DMRB LA 111. Planting is not relied upon as an acoustic mitigation measure.</p> <p>Where earthwork measures are not possible, low noise road surfacing has been proposed and is secured through REAC commitment NV013 as part of the CoCP. With regards to surface renewal, REAC commitment NV013 was amended by the Applicant and submitted at Deadline 5 to include “<i>Surface renewal will be undertaken using replacement road pavement on the strategic road network that has a no worse noise emission performance (Highway Authority Product Approval Scheme certification values) than that laid for the Project’s opening</i>”.</p>	<p>Analysis [<a href="#">APP-450</a>]</p>	
<p><b>Project design and mitigation</b></p> <p>Mitigation measures for noise and vibration</p>	<p>2.1.92</p>	<p>Discussion needed about what protective measures will be put in place, when and where to maximally protect the local residents, which should be of most importance.</p>	<p>The Applicant has sought to reduce its impact on the local community during the construction phase. Mitigation measures are included in the REAC within the CoCP to minimise the potential effects of dust, noise, and light impacts.</p> <p>ES Chapter 12: Noise and Vibration includes noise and visual assessments from construction activities including working hours from several perspectives (e.g. noise) which has informed mitigation measures such as the use of bunds and fences where</p>	<p>REAC within the Code of Construction Practice [<b>Document Reference 6.3 ES Appendix 2.2 (9)</b>]</p> <p>ES Chapter 12: Noise and</p>	<p>Matter Not Agreed</p>

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			appropriate to lessen the impact of these activities to residential housing.	Vibration <a href="#">[APP-150]</a>	
<b>Project design and mitigation</b>  Design changes	2.1.93	Inexplicable changes to noise barriers, e.g. barrier at Park Pale apparently removed at suggestion of the AONB for visual impact reasons that seem minor and wrong having regard to the removal of the central reservation trees which is also occurring. This barrier is anyway needed to mutually screen headlights so must be reinstated.	There is no requirement for a noise barrier in this location as a result of the existing A2 upgrade/widening implementing a low-noise surface compared to the existing Hot Rolled Asphalt surface. By introducing a higher standard of low-noise road surfacing, the Applicant is able to remove one of the previously proposed noise barriers, which will lead to a reduction in the visual impact of the proposals in that area. This change responds to feedback received from Kent Downs AONB Unit (a statutory consultee) about the visual impact of the noise barrier near Park Pale bridge. A barrier is also not needed for visual screening because design refinements have made it possible to retain more trees between Park Pale and the A2 corridor.	N/A	Matter Not Agreed
<b>Assessment of likely significant effects</b>  Impact on recreational routes and Shorne Woods Country Park	2.1.94	Area and recreational facility currently valued for tranquillity will become subject to greatly increased traffic noise.	During the community impacts consultation, the Applicant presented information about the predicted impacts of the new road on visual amenity and landscape. The Applicant outlined how it has sought to reduce these impacts through good design and measures such as landscaping, planting and false cuttings to screen views of the new road and traffic. Areas used temporarily for construction would be	REAC within the CoCP <b>[Document Reference 6.3 ES Appendix 2.2 (9)]</b>  ES Chapter 12: Noise and	Matter Not Agreed

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			restored to their former use. The visual impacts of the Project would be controlled through the good practice measures set out in the CoCP and REAC. ES Chapter 12: Noise and Vibration presents a full assessment of noise and vibration.	Vibration <a href="#">[APP-150]</a>	
<b>Assessment of likely significant effects</b>  Impact on residential properties and recreational areas close to the Project	2.1.95	Noise contours were only published in July 2021 and showed that residential properties and recreational areas, including the new Chalk Park, will be badly affected by noise from the Project.	ES Chapter 12: Noise and Vibration presents a full assessment of noise and vibration.	ES Chapter 12: Noise and Vibration <a href="#">[APP-150]</a>	Matter Not Agreed
<b>Assessment of likely significant effects</b>  Data validity	2.1.96	Background noise levels quoted appear too high, aware additional readings are now being taken.	ES Chapter 12: Noise and Vibration presents a full assessment of noise and vibration.	ES Chapter 12: Noise and Vibration <a href="#">[APP-150]</a>	Matter Not Agreed
<b>Population and human health</b>					
<b>Public Open Space / Access to Recreation</b>	2.1.97	A very popular golf course, the only “pay and play” type for a considerable distance, is being lost. In fact it has now already closed pending sale of the land	The Applicant proposes to permanently acquire the site for the new road and for landscaping. The Applicant is not proposing to replace the golf club but instead, to create a new parkland area on part of the	ES Chapter 13: Population and Human Health <a href="#">[APP-151]</a>	Matter Not Agreed

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Loss of golf course		<p>(SPC assume to NH) but given the time to start of construction it could and should have remained open.</p> <p>SPC Update: Closure of the golf course was linked with the project and is very much regretted locally as it was a “Pay and Play” course whereas others mentioned in NH’s document as available to be used instead are private with restricted membership.</p> <p>The project does not replace what has been lost.</p> <p>SPC Update: There appear to be ongoing negotiations between GBC, Swing-Rite golf and the Applicant over optimisation of remaining facilities.</p>	<p>site that would be open to the public after construction.</p> <p>An assessment of the Project’s impact on the Southern Valley Golf Club (SVGC) is set out from paragraph G.4.12 onwards of Planning Statement Appendix G- Private Recreational Facilities, as well as at Table 13.57 of Environmental Statement Chapter 13: Population and Human Health.</p> <p>Paragraph 5.174 of the NPSNN states (emphasis added) ‘<i>The Secretary of State should not grant consent for development on existing...sports and recreational buildings and land... unless an assessment... has shown the... buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities</i>’.</p> <p>It is the Applicant’s position that the Project complies with paragraph 5.174 of the NPSNN, specifically that part of paragraph 5.174 in relation to which emphasis is placed above.</p> <p>In relation to the loss of SVGC, the Applicant considers that the proposal is consistent and complies with NPSNN paragraph 5.174. This is on the basis that</p>	<p>Planning Statement Appendix G - Private Recreational Facilities [<a href="#">APP-502</a>]</p> <p>Design Principles [<b>Document Reference 7.5 (7)</b>]</p> <p>Draft DCO [<b>Document Reference 3.1 (11)</b>]</p>	

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			<p>the benefits of the Project (including the need for the Project) outweigh the loss of SVGC, taking into account the positive proposal made by the Project for the creation of Chalk Park, which is an entirely new recreational site to be created in the same locality.</p> <p>Chalk Park is greater in area than the former SVGC site and would be functional and accessible for the wider community with connections to the wider environment as well as providing a similar setting with open views. The provision of over 35ha of new open space at Chalk Park is secured by Design Principle S3.04. Paragraph G.4.16 of Planning Statement Appendix G - Private Recreational Facilities goes on to state: 'The mitigation of any adverse effects on the green infrastructure and recreational facility arising from the Project would be adequately provided for by means of the general provision and enhancement of the local recreational infrastructure including Chalk Park. Whilst this provision is not an identical substitution for the loss of private golf facilities, it would significantly improve the general provision of green infrastructure and recreational facility in the same locality to counterbalance the loss of green infrastructure and recreational facility caused by the loss of Southern Valley Golf</p>		

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			Club. This provision is secured by means of Requirement 3 (detailed design) of Schedule 2 (requirements) of the draft Development Consent Order (DCO) to carry out the Project in accordance with the general arrangement drawings.		
<p><b>WCH / Active Travel - Design</b></p> <p>Multi-user paths safety</p>	2.1.98	<p>The Project wants to provide multi-user paths but horses can churn up surfaces making them impassable in wetter months, and cyclists and horses with pedestrians are a poor safety mix. Where there are multi-user routes they should have separated areas for safety reasons.</p> <p>SPC Update: This is of concern to a wide variety of IP's. It is not possible to say that we "agree" the WCH routes without knowing how they will be delivered structurally - too much is being left to trust in future decisions.</p> <p>Note that better plans have been submitted: REP2-072 9.60 Supplementary Walking, Cycling and Horse Riding (WCH) Maps (Volume A). Please see comments in our D3 responses.</p>	<p>The proposed walking, cycling and horse riding (WCH) strategy has been developed to the latest DMRB standards and takes into account guidance within the LTN 1/20 Cycle Infrastructure Design (DfT, 2020). The proposed WCH routes will be developed at detailed design using these standards, which are outlined within the Design Principles, to determine suitable widths, separation and surface requirements.</p> <p>The WCH provision in the Project is set out in the Rights of Way and Access Plans and Schedule 5 of the draft DCO. Further information on the provision is set out in the Project Design Report.</p> <p>The Applicant committed in the Post-event submissions, including written submissions of oral comments for OFH2 in response to the comments made by the British Horse Society, to provide a new set of maps to draw together all the various sources of information on Walking, Cycling and Horse Riding (WCH) routes into a single place.</p>	<p>Design Principles <b>[Document Reference 7.5 (7)]</b></p> <p>Schedule 5 of the draft DCO <b>[Document Reference 3.1 (11)]</b></p> <p>Project Design Report Part E: Design for Walkers, Cyclists and Horse Riders <b>[APP-512]</b></p> <p>Rights of Way and Access Plans <b>[Document</b></p>	Matter Not Agreed



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			<p>These maps provide a quick reference document, which is supplemented by other plans at a larger scale showing details of existing and proposed WCH routes. The maps also provide a better understanding of the Applicants WCH proposals, in particular the difference between existing WCH routes that the Applicant would improve and new routes that the Applicant would create. The maps also show the categories of users that the WCH routes are intended for.</p>	<p><b>Reference 2.6 Volume A (5), Volume B Composite (6), Volume B Utilities (5), Volume C (7)]</b></p> <p>Post-event submissions, including written submissions of oral comments for OFH2  <a href="#">[REP1-185]</a></p>	
<p><b>WCH / Active Travel - Operational Effects</b></p> <p>Connectivity of paths</p>	<p>2.1.99</p>	<p>Especially with recent expansion of land take for NOx offset, there should be creation of continuous longer distance paths that connect up communities.</p> <p>Some of the paths residents use are former woodsman’s tracks for coppicing, although shown on maps these are not public footpaths but need to be made so, with this being enabled as part of the project. SPC particularly mention Court Wood and Great Crabbles Wood in this context.</p>	<p>A WCH Strategy has been developed to help improve connectivity to the existing PRoW network and repair any severance caused directly by the Project. The strategy has been developed through dialogue with stakeholders and through a series of formal consultations to identify where proposed improvements should be provided. For those wider areas not directly impacted by the Project, there are opportunities for Designated Funding from the Applicant to be assigned as part of a legacy package of works.</p> <p>The WCH provision in the Project is set out in application documents, specifically the</p>	<p>Rights of Way and Access Plans  <b>[Document Reference 2.6 Volume A (5), Volume B Composite (6), Volume B Utilities (5), Volume C (7)]</b></p> <p>Schedule 5 of the draft DCO  <b>[Document</b></p>	<p>Matter Not Agreed</p>

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			Rights of Way and Access Plans and Schedule 5 of the draft DCO. Further information on the provision is set out in the Project Design Report.	<b>Reference 3.1 (11)]</b>  Project Design Report Part E: Design for Walkers, Cyclists and Horse Riders <a href="#">[APP-512]</a>	
<b>Cross-river WCH and Sustainable Travel</b>  Non-motorised users enabled to use the crossing	2.1.100	There need to be bus routes that connect Kent and Essex. There have been requests for shuttle buses to assist cyclists to cross, they are expected to use the Gravesend to Tilbury ferry.	The new road creates opportunities for operators to develop new local and regional bus services, by providing new connectivity between Kent, Thurrock and Essex. Identification and development of these routes is the responsibility of the relevant operators. Local buses will not have to pay the user charge for the Lower Thames Crossing, reducing operating costs for operators.  The Applicant considered options during the development of the Project to provide improved river crossings for walkers and cyclists. The options investigated include using the tunnel, upgrading the existing ferry, relocating the ferry, building a separate bridge or cable car, and providing a shuttle service through the tunnel. All of these options have been rejected for reasons including lack of technical	N/A	Matter Not Agreed

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			<p>feasibility, operational issues, lack of commercial viability, cost, environmental impacts and poor safety. Latent demand for walking and cycling across the River Thames at the Project crossing point is low and therefore unlikely to unlock enough trips to make the required infrastructure for a shuttle service economically viable. In addition, journey times and distances for a shuttle would be excessive because the most suitable collection and drop-off points would be at the proposed M2/A2/A122 Lower Thames Crossing junction and as far north as the proposed A13/A1089 junction.</p> <p>There is no provision for cyclists. The Lower Thames Crossing has been designed to provide a free-flow connection between the A2 and M25 with a maximum speed of 70mph. The Applicant is working closely with communities and local authorities on ensuring there is minimal impact on roads. The Applicant will investigate the provision of temporary/permanent alternative footpaths, bridleways and cycle paths for users where the new crossing will impact on existing routes.</p>		
<p><b>WCH/Active Travel – Design</b></p> <p><b>WCH severance</b></p>	<p>2.1.120</p> <p>DL9A</p>	<p>WCH Severance: The proposals cause WCH severance in a variety of ways as existing routes are cut but the replacements</p>	<p>Impacts to WCH are described in ES: Chapter 13: Population and Human Health.</p> <p>Impacts to NS 167 during the construction phase would result from required utility diversion works, which may affect the route</p>	<p>ES Chapter 13: Population and Human Health  <a href="#">[APP-151]</a></p>	<p>Matter Not Agreed</p>

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p>offered are less convenient and less suitable for all users:</p> <ul style="list-style-type: none"> <li>• The loss of footpath NS 167 (connected to NS 169 from Shorne West) causes very bad severance and results in a 1km diversion north and back south again.</li> <li>• The loss of NCR177 also causes a 1km diversion south across the A2 over a convoluted and urbanised, polluted route with several major road junctions and roundabouts to be crossed causing safety concerns.</li> <li>• Proposals could be improved if there was a "Thames Chase" style WCH bridge reconnecting NS167 and also carrying NCR 177.</li> </ul> <p>We are unable to understand why such an obvious solution has not been proposed.</p> <p>SPC Final Update: Less able users may not be able to make journeys that they could previously due to the increase in length.</p>	<p>for a period of up to 48 months. To maintain connectivity between Shorne Woods Country Park and residential areas to the west during the construction phase, the Project would aim to install new routes and open these to the public within a month of closing the existing route. A temporary designated walkway would be provided adjacent to the existing Thong Lane to connect the new routes prior to installation of the new Thong Lane green bridge.</p> <p>For safety reasons the intermittent closures/interference of the route would be necessary to facilitate key works such as overhead line diversions.</p> <p>Although the length of route has increased by more than 500m and this would therefore constitute a major adverse magnitude of effect in line with DMRB LA 112, the nature of the route is recreational and as such the greater distance may not be perceived as an adverse effect by users (indeed, it may have a health benefit in terms of encouraging levels of physical activity).</p> <p>The Applicant has identified that NCR 177 between Gravesend East junction and the Park Pale bridge over the A2 would initially be affected by utility works. The route would also be permanently closed to accommodate the new M2/A2/A122 Lower Thames Crossing junction. Upgrades to</p>		

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		The suggested bridge is for a flat area north of the A122:A2/M2 junction, we did not suggest it passing over the junction.	<p>existing footpaths and tracks would be undertaken prior to the closure of the existing NCR 177 alignment to ensure that a suitable alternative route is available; once works are complete an alternative roadside route would be available as a permanent diversion.</p> <p>Although both the temporary and permanent diversions to NCR 177 involve increased travel distances, the Applicant considers that these are not significant in terms of affecting their level of use by cyclists in terms of the overall distances typically travelled by cyclists using the route; both the temporary and permanent diversion routes allow for improved user experience.</p> <p>It is not considered feasible to connect NS 167 to NCR 177 with a bridge passing over the A2/M2 junction, owing to the variations in ground levels between the two routes, among other factors.</p>		
<p><b>Impacts</b></p> <p>School traffic impacts are not adequately assessed</p>	<p>2.1.121</p> <p>DL9</p>	<p>School traffic impacts are not adequately assessed and are being understated because only part of the problem is being considered.</p> <p>The Applicant has considered the issue of impacts on children getting to schools in the LTC works area but only from the</p>	<p>The Population and Human Health assessment includes impacts on educational facilities. Schools have been identified within a prescribed study area (500m from the Order Limits).</p> <p>Table 13.68 of ES Chapter 13: Population and Human Health notes that a range of measures are in place to ensure that active travel routes for children are not adversely impacted by the Project, and to enable</p>	<p>ES Chapter 13: Population and Human Health <a href="#">[APP-151]</a></p> <p>Health and Equalities Impact Assessment</p>	Matter Not Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant’s Response	Application Document Reference	Status
		<p>viewpoints of public bus services and the location of local schools. The Applicant needs to consider impacts on other school bus services that may be private and also private vehicle use by parents, which is considerable particularly for nursery and primary age children.</p> <p>The Applicant also needs to especially consider impacts from the viewpoint of where children who live in the area that will be impacted by construction need to go to school – for secondary school children in many cases this this will mean travelling across the construction line. For example, children from Shorne and Higham need to get to secondary schools in Gravesend, and children in Gravesend need to get to Gads Hill and various parts of Strood and Rochester. All age ranges need to be considered from nursery up to colleges of further education. This is not agreed because we consider that further work needs to be done to consider impacts on all school journeys.</p>	<p>communication and engagement with individual schools. These are set out in further detail in paragraphs 7.5.25 to 7.5.29 of the Health and Equalities Impact Assessment (HEqIA) and include the following:</p> <ul style="list-style-type: none"> <li>Measures in place in the oTMPfC which must be addressed in the Traffic Management Plan in relation to access/egress to schools, and the requirements for local schools to have unhindered and safe walking and cycling routes.</li> <li>The Schools Engagement Plan for the Project has been used to record feedback about matters/concerns that individual schools express and as a basis to discuss various environmental matters, including those relating to access/travel to school.</li> <li>The ES Appendix 2.2: CoCP states that the Contractor's Engagement and Communications Plan (ECP) will specify a detailed programme of community engagement for specific stakeholder groups, including schools, identifying proposed methods and likely timing of consultation activities during the construction period.</li> </ul> <p>In addition, the Stakeholder Actions and Commitments Register (SAC-R) includes a</p>	<p>(HEqIA) [<a href="#">REP7-144</a>]</p> <p>oTMPfC [Document Reference 7.14 (9)]</p> <p>CoCP [Document Reference 6.3 ES Appendix 2.2 (9)]</p> <p>Stakeholder Actions and Commitments Register (SAC-R) [Document Reference 7.21 (7)]</p>	

Topic	Item No.	Shorne Parish Council Comment	The Applicant’s Response	Application Document Reference	Status
		<p>SPC Final Update: A list of the additional relevant schools (several are in Rochester) has been provided to the Applicant.</p>	<p>commitment for the Contractors to develop and provide an educational road safety programme for school-aged children at relevant local schools along the Project route. Table 2.3 of the oTMPfC is designed to give an outline of the groups likely to be impacted, their requirements, and how the Traffic Management Plans would address their requirements. The Traffic Management Forum (as detailed in the oTMPfC) would be the appropriate forum to discuss issues and develop mitigation measures where required. Table 2.3 of the oTMPfC does list “local schools” as an affected stakeholder, and includes how the Traffic Management Plans would address their requirements, including stating that Project-related HGV movements would not be allowed to pass school entrances during drop-off/pick-up times. Any schools that would be adversely affected by construction activities are included in the Applicant’s liaison programme.</p> <p>Through the Applicant’s stakeholder engagement and the Employment and Skills Working Group, a red/amber/green (RAG) rating system will be used for the prioritisation of engagement for local educational facilities to be more dynamic, allowing for organisations to move through categories according to the Project timeline and the impacts identified by the Project (both Contractor’s and Applicant’s teams),</p>		

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			<p>local authorities and the schools themselves. The RAG rating considers both proximity and intensity of impact. The ratings will be reviewed appropriately as construction progresses. The Applicant will continue its engagement with local schools to discuss concerns and feed this into conversations with the appointed Contractors.</p> <p>The Applicant expects that nurseries would be considered in discussions during the development of the Traffic Management Plan. It is noted that the nature of nurseries is not as specific as schools in terms of starting and closing times therefore it would depend on the locations and timings of the nurseries, but it is expected that a representation from the CLG would bring venues to the attention of the TMF for discussion.</p>		
<b>Road drainage and the water environment</b>					
<p><b>Project design and mitigation</b></p> <p>Drainage and storage proposals</p>	<p>2.1.101</p> <p>RRE</p>	<p>Adequacy of proposals for drainage and storage: Drainage ponds near A226 have been amalgamated with those further south, how will water from more northerly road surfaces get to there, location and landscaping of pumps, failsafes/backup.</p>	<p>Operational drainage discharges to ground have been subject to water quality modelling assessments that demonstrate no risks of pollution of underlying groundwater resources. A temporary discharge of rainfall runoff is also proposed and this will be governed by the parameters of an Environment Agency discharge permit that</p>	N/A	Matter Not Agreed



Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		<p>Ponds need capacity for heaviest incidence of rainfall, which can be torrential, not yearly average.</p> <p>Reassurance needed that capacity is suitable for the vast areas of tarmac being created, especially the 2km long slope of the LTC.</p> <p>Risk of flooding to houses on the A226 and contamination to North Kent Marshes SPA should there be overspill<sup>101</sup></p>	will secure the required water quality standards.		
<p><b>Project design and mitigation</b></p> <p>Biodiversity value of drainage ponds</p>	2.1.102	<p>It is hoped that the lower parts (least contaminated?) of the pond series might have some biodiversity/habitat qualities.</p> <p>SPC Update: This response does not answer the question about biodiversity value (if any) of the drainage ponds.</p> <p>We acknowledge the primary aim but in a cascade situation it could be a secondary achievement for the later ponds (of the cascade), that's what we were asking about. Matter agreed as question has been answered.</p>	<p>The drainage design incorporates Sustainable Drainage Systems (SuDS) and reduces the risk of causing flooding elsewhere by using attenuation features as presented on Figure 2.4: Environmental Masterplan. Drainage of operational areas on greenfield sites would be designed to ensure that post-development surface water runoff rates do not exceed existing rates. Where this attenuation is provided via ponds, the ponds would be designed to appear as naturalistic elements within the wider setting, with planting provided to soften edges where this is appropriate.</p> <p>The Applicant would like to clarify that the primary function of the drainage ponds is to serve the highway drainage network.</p>	<p>ES Figure 2.4: Environmental Masterplan  <b>[Document Reference 6.2 ES Figure 2.4 Sections 1 and 1a (4), Section 2 (5), Section 3 (4), Section 4 (2), Section 9 (6), Section 10 (4), Section 11 (3), Section 12 (3), Section 13 (3), Section 14 (3)]</b></p>	Matter Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant’s Response	Application Document Reference	Status
			Although the drainage ponds could have a secondary benefit to biodiversity this has not been factored into the development of the ecological mitigation strategy.		
<p><b>Project design and mitigation</b></p> <p>Contamination of North Kent Marshes SPA</p>	2.1.103	<p>Proposals include using a present arable field north of the Lower Higham Road as a “temporary” drainage area during construction, this field is bounded on its west by the “Ramsar Ditch” which is part of the Ramsar Site. Assurance is needed that contaminated water cannot enter the interconnected marshes supply and drainage system.</p> <p>Note that construction plans also include using the Ramsar Ditch for drainage outflow to the Thames, detail of how this would be affected are lacking.</p> <p>Some clarification showed that the arable field is not being flooded but the other points remain therefore this matter is Not Agreed.</p>	<p>The three arable fields north of Lower Higham Road are only required for temporary use as per the land use plans. During the period of temporary use, the fields will be farmed in such a way as to ensure winter stubble remains so it can be used for birds.</p> <p>The new drainage pipes are to convey temporary surface water discharges (suitably treated by a settlement lagoon) and not required permanently. The temporary drainage outfall would only be in place during the construction period. Permanent subsurface rights are sought for the stretch of the pipe running underneath Lower Higham Road to the field to allow for the redundant pipe to be decommissioned and left in situ should its removal not be practical or economical. If the pipe is left in situ, measures would be taken to ensure it is appropriately capped.</p> <p>The discharge of runoff from the southern tunnel entrance compound would be governed by an Environment Agency Discharge Consent, the conditions of which the Contractor would be bound to comply with. This will safeguard against</p>	N/A	Matter Not Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
			contamination entering the Ramsar site. Protocols to prevent pollution during extreme weather events would also be put in place and would be documented in the detailed Construction Environment Management Plan.		
<p><b>Project design and mitigation</b></p> <p>Water flow from Shorne Ifield Farm to west of Chalk Church</p>	2.1.104	<p>SPC have asked repeatedly about this because a map issued early on included a water flow route supplying the marshes that would be transected by the works. SPC have been told that there isn't a pipe identified but we had not been thinking it was necessarily culverted. Verbal information via Gravesham Borough Council is that according to Natural England it is a mapping error but we would like more detailed, written assurances over lack of existence and what route this waterflow actually takes.</p> <p>SPC Update: The same map is still on the KCC website, unchanged.</p> <p>We would like confirmation from the Environment Agency <u>and</u> Southern Water about where the Ifield Farm stream flows to/the route that its water takes.</p>	<p>The Applicant has undertaken extensive searches to find more information about this watercourse, including with the landowner/ land agent, the EA and the Lead Local Flood Authority and no records of it have been found. No evidence of its presence has been identified during site walkovers. It is concluded that no culverted watercourse exists in the alignment shown in the early Project maps.</p> <p>The Applicant has been working closely with Southern Water on issues regarding their assets and this is reflected in the final SoCG where all matters have been agreed.</p>	Statement of Common Ground between National Highways and Southern Water Services Limited <b>[Document Reference 9.32 (2)]</b>	Matter Not Agreed

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		<p>This is a permanent (i.e. all seasons) stream that might be affected adversely by the project, you ought to know this information and be able to tell us.</p> <p>SPC Update: A map in Southern Water documents, “Southern Water Drainage and Wastewater Management Plan (DWMP), Overview of the Medway River Basin Catchment, October 2022, Version 2” referenced in REP5-124 pages 11-12, also shows a water route in the area of concern.</p> <p>This matter is not agreed because the point has not been clarified.</p>			
<p><b>Project design and mitigation</b></p> <p>Effect on existing ponds/lakes</p>	<p>2.1.105</p>	<p>There are, or should be existing lakes and ponds locally, concern that these could have their water supply, or water retention ability, compromised.</p> <p>SPC: We are reviewing the numerous documents related to water issues, some of which are very long and complex so more time is needed.</p> <p>We have been unable to find any specific information to provide us</p>	<p>The ES includes an assessment of likely significant effects on both surface and groundwater receptors, including effects on water flows, levels and quality.</p> <p>The baseline description of existing lakes and ponds in and around Shorne is described in paragraphs 14.4.3, 14.4.81 and 14.4.91 of ES Chapter 14: Road Drainage and the Water Environment.</p> <p>Paragraph 14.5.15 of ES Chapter 14: Road Drainage and the Water Environment describes commitment to mitigation to</p>	<p>ES Chapter 14: Road Drainage and the Water Environment  <a href="#">[APP-152]</a></p>	<p>Matter Not Agreed</p>

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		with assurances therefore this remains a concern.	prevent effects of utilities works on New Fish Pond at Inn on the Lake, and paragraph 14.6.56 presents an assessment of effects accounting for this mitigation.		
<b>Project design and mitigation</b>  Chemical de-icing increasing contaminated run-off	2.1.106	<p>The new 2km long incline up from the marshes, and the junctions and additional feeder roads, will need a significant amount of chemical de-icing in winter, this increases the amount of contaminated run-off and increase threat to the marshes. Heated road surfaces were suggested as a possible reduction measure.</p> <p>SPC Update: Minimised is a weasel word, the question was about reducing need to use chemical de-icing (including salt) in the first place. Have alternative means to using chemicals been considered, and with what outcome?</p> <p>SPC Update: We were asking if the need for and amount of salt (or other chemicals) deposited could be minimised by using for example heated road surfaces.</p>	<p>An assessment of the potential effects of the operational drainage systems on surface and groundwater receptors has been carried out and is presented within the ES. Appropriate mitigation has been detailed within the drainage design to ensure effects are minimised.</p> <p>The Applicant considers the assessment undertaken in the ES is appropriate in terms of assessing the potential effects of the operational drainage systems on surface and groundwater receptors.</p> <p>The Applicant will use the most appropriate treatment so as to keep the strategic road network open to traffic. The Applicant continues to research ways to reduce the levels of de-icing materials it applies to its network and, when appropriate, would consider its application.</p>	ES Chapter 14: Road Drainage and the Water Environment <a href="#">[APP-152]</a>	Matter Not Agreed
<b>Project design and mitigation</b>	2.1.109	Under item 2.1.108 we said that "Project must not increase the threat to low lying areas."	During construction it is proposed to manage surface water drainage (constituting rainfall runoff) from the	REAC within the CoCP <b>[Document]</b>	Matter Not Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant’s Response	Application Document Reference	Status
<b>Flood risk</b>		<p>SPC Update: We have concerns about possible flood risk from Great Clane Marsh to nearby houses on Lower Higham Road if additional water is to be outflowed there during construction. This area floods in winter already (see flood maps).</p> <p>Clarification is needed about detailed use of the land (volume and characteristics of the outflow water) and any machinery/structures that will be associated (rectangular blocks on maps).</p> <p>SPC Update: We accessed information that water is not actively stored on the marsh but there is going to be a large volume of water discharged and the ability to outflow from the ditch and area will depend on the tide so the concern remains.</p>	<p>southern tunnel entrance compound via systems that collect, treat and encourage infiltration to ground, and that collect, treat, store/attenuate and discharge into the River Thames via a new outfall to an Environment Agency main river that flows through Great Clane Marsh.</p> <p>To safeguard the receiving water environment and to ensure compliance with the requirement to prevent any detriment to off-site flood risk, rates of outflow into the marsh would be controlled and governed by the conditions of an Environment Agency Discharge Consent as secured by commitment RDWE033 (ES Appendix 2.2: CoCP. This commitment stipulates that discharge rates would be limited to greenfield rates (i.e. matching pre-development runoff rates).</p> <p>As a result of the stage in the design process, details of these drainage systems are not yet available for inclusion in the works plans. However, two parallel arrays of 5no. treatment lagoons with average depth of 1.5m, are envisaged, with one array on-line and one undergoing cleaning/maintenance to assist in management of the overall system. In more extreme rainstorms both arrays could be filled to provide additional storage capacity. The lagoons have been situated to take advantage of the</p>	<p><b>Reference 6.3 ES Appendix 2.2 (9)]</b></p> <p>Draft DCO  <b>[Document Reference 3.1 (11)]</b></p>	

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			<p>sloping topography of the compound site in order to put in place a gravity-based drainage system, rather than a less sustainable pumped regime. Whereas presently the area proposed to accommodate the attenuation and storage systems is prone to waterlogging in winter, as it represents a low spot in the fields that are not served by a formal drainage system, this regime would change and the risk of flooding in this area would be reduced by provision of the drainage systems serving the compound.</p> <p>The Applicant also wishes to reiterate that all construction activities/temporary works would be carried out in accordance with the recommendations of a construction phase Flood Risk Assessment prepared by the Contractor (secured as REAC commitment RDWE001) and a construction phase drainage plan will also be prepared which will demonstrate how the Contractor would manage surface water runoff across the worksites, including details of how offsite impacts would be prevented (secured as REAC commitment RDWE006 within ES Appendix 2.2: CoCP. Both of the plans/assessments secured by these commitments are to be approved, pursuant to Requirement 8 of the DCO, by the Secretary of State, following consultation</p>		

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			with the relevant planning authorities. Information on the detailed layout of compounds and construction plant will be defined as part of the Contractor's detailed design.		
<b>Project design and mitigation</b>  Relocation of the balancing pond at Park Pale	2.1.122  DL9	<p>In REP4-396, page 4 we expressed concern about this situation whereby NH made an agreement with a business to relocate the balancing pond. This facilitated the business taking over an area of farmland, in the Green Belt and AONB, which was part of a single parcel that NH were voluntarily purchasing, and which the business did not previously own.</p> <p>We consider this area of land would have been a preferable location for the pond (presumably there were engineering and other reasons for the original choice), or could have been used for compensation/mitigation as it is a better location for plantings to screen the A2/M2 from view and better than taking someone else's</p>	<p>Following Statutory Consultation, the Applicant modified the location of the balancing pond near Park Pale following a request from the landowner to move the balancing pond further east.</p> <p>In line with CPO guidance under the Planning Act 2008<sup>1</sup>, the Applicant felt this request was reasonable therefore this change was incorporated into the design and presented in the Supplementary Consultation design. In addition, land to the west of the relocated balancing pond was proposed to be used as a compound and included for temporary possession and permanent application of covenants for utilities.</p> <p>After Supplementary and Design Refinement Consultation, the Applicant further refined the Project's land requirements in collaboration with utility companies and, as a result, there was no longer any requirement (temporary or</p>	N/A	Matter Not Agreed

<sup>1</sup> [https://assets.publishing.service.gov.uk/media/5a748a8ce5274a7f9902904a/Planning\\_Act\\_2008\\_-\\_Guidance\\_related\\_to\\_procedures\\_for\\_the\\_compulsory\\_acquisition\\_of\\_land.pdf](https://assets.publishing.service.gov.uk/media/5a748a8ce5274a7f9902904a/Planning_Act_2008_-_Guidance_related_to_procedures_for_the_compulsory_acquisition_of_land.pdf)



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		land further away from the line of the A2/M2. The intentions that the business have for the land are presently unknown. We consider that Shorne PC and GBC should have been consulted prior although are unlikely to have approved such a manoeuvre. SPC Final Update: Response assumes the business applies in advance rather than retrospectively.	otherwise) for the land west of the balancing pond and it was therefore removed from the Order Limits. If this land should change use in the future, it would be subject to a full planning application at which point it would be expected that relevant stakeholders such as Gravesham Borough Council and Shorne Parish Council would be consulted and be afforded an opportunity to make representations at that time.		
<b>Climate</b>					
<b>Assessment Methodology</b>  Effect of climate change on the project	2.1.107	Documentation discussed effect of the project on climate change but not the reverse, i.e. how climate change might affect and threaten the project. SPC Update: We still have concerns about issues such as: effect of high tides and extreme rainfall (which together cause local flooding) on water outflow during construction, water storage capacity of roadways drainage during very bad storms. Also sea fogs are common in the area and we believe increasing in frequency.	To ensure the effects of climate change are minimised during operation, the Project would be designed in accordance with the standards set out in the Applicant's DMRB. Construction materials and products would be selected that are more resilient to the effects of projected future climate change. The road and any associated assets would be maintained to ensure that any deterioration and/or defects would be identified and managed as quickly as possible. More information is provided in ES Appendix 15.3: Climate Resilience Impacts and Effects.	ES Appendix 15.3: Climate Resilience Impacts and Effects <a href="#">[APP-482]</a>	Matter Not Agreed

Topic	Item No.	Shorne Parish Council Comment	The Applicant's Response	Application Document Reference	Status
		Our concern remains about severe weather conditions with much greater than average rainfall causing overflow of drainage ponds and therefore this is not agreed.			
<b>Project design and mitigation</b> Enhancement of flood defences	2.1.108	Documentation discussed this early on but it disappeared from later versions, reasons unclear. Project must not increase the threat to low lying areas.	During construction and operation, flood defences will be monitored to ensure structural stability. Remedial action will be taken if necessary to maintain the defences. The Project design includes flood resilience and this design includes amendments necessary due to predicted climate change.	N/A	Matter Agreed

## Appendix A Engagement activity

A.1.1 The table below summarises communication in relation to progressing this SoCG. The Applicant notes that there has been a variety of informal communication, such as telephone calls between the parties to discuss Project updates and various ad-hoc queries, which are not set out in the table below.

**Table A.1 Engagement activities between the Applicant and Shorne Parish Council since the DCO application was submitted on 31 October 2022**

Date	Overview of engagement activities
12 January 2023	The Applicant emailed Shorne Parish Council about the Procedural Decision which requested a PADS Tracker and suggested whether a Teams meeting would be helpful.
01 February 2023	The Applicant shared a document with signposting for Shorne Parish Council's Matters Under Discussion to find information within the DCO Application Documents and the PADS Tracker template.
03 March 2023	The Applicant emailed Shorne Parish Council as a reminder about the PADS Tracker deadline and that they would be responsible for submitting it. Shorne Parish Council shared a draft of the PADS Tracker and updated the Applicant on progress in relation to SoCG matters.
06 March 2023	The Applicant provided feedback on the PADS Tracker and queried whether signposting document was helpful or if further assistance would be required.
10 March 2023	Shorne Parish Council shared PADS Tracker with the Applicant.
23 March 2023	The Applicant contacted Shorne Parish Council with offer of teams meeting to discuss SoCGs, PADS Tracker, next steps and timescales.
11 April 2023	The Applicant emailed Shorne Parish Council with updates regarding the SoCG template, shared the latest version with queries for Shorne Parish Council and requested if updates could be made and shared by 28 April.
May to July 2023	The Applicant and Shorne Parish Council continued to engage during this period but did not make any progress on the SoCG items specifically. SPC informed the Applicant that they were focusing on reviewing documents and attending the initial Examination hearings.
10 August 2023	The Applicant met with Shorne Parish Council to discuss progress on the SoCG and PADS Tracker, and agree a strategy for moving matters in the SoCG. Next meeting planned for 17 August.
17 August 2023	The Applicant and Shorne Parish Council met to review matters and agreed further status changes. Next meeting planned for 31 August.
31 August 2023	The Applicant and Shorne Parish Council met to review outstanding matters and agreed further status changes for the next iteration of the SoCG.

<b>Date</b>	<b>Overview of engagement activities</b>
9 October 2023	The Applicant's specialist representative and Shorne Parish Council met to discuss matters relating to tunnelling, particularly the Ground Preparation tunnel proposal.
7 November 2023	The Applicant and Shorne Parish Council met to review outstanding matters and agreed further status changes for the next iteration of the SoCG.
28 November 2023	Teams meeting to review outstanding matters and agree status changes and updated narrative on various items for the final SoCG.

## Appendix B Glossary

Term	Abbreviation	Explanation
Area of Outstanding Natural Beauty	AONB	Statutory designation intended to conserve and enhance the ecology, natural heritage and landscape value of an area of countryside.
Code of Construction Practice	CoCP	Contains control measures and standards to be implemented by the Project, including those to avoid or reduce environmental effects.
Design Manual for Roads and Bridges	DMRB	A comprehensive manual which contains 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 the highway authority. For the A122 Lower Thames Crossing, the Overseeing Organisation is National Highways.
High Speed 1	HS1	A 109km high-speed railway between London and the UK end of the Channel Tunnel. The line carries international passenger traffic between the UK and continental Europe; it also carries domestic passenger traffic to and from stations in Kent and east London, as well as Berne gauge freight traffic.
Lower Thames Crossing	LTC/the Project	The proposed A122 Lower Thames Crossing.
Outline Traffic Management Plan for construction	oTMPfC	Outlines the approach to carrying out temporary traffic management for the safe construction of the Project and the management measures to reduce the impact on local communities.
Transport Analysis Guidance	TAG	National guidance document produced by the Department for Transport.
Ramsar	Ramsar	A wetland of international importance, designated under the Ramsar convention.
Register of Environmental Actions and Commitments	REAC	The REAC identifies the environmental commitments that would be implemented during the construction and operational phases of the Project if the Development Consent Order is granted, and forms part of the Code of Construction Practice.
Special Area of Conservation	SAC	A designation under EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, also known as the Habitats Directive.
Site of Special Scientific Interest	SSSI	A conservation designation denoting an area of particular ecological or geological importance.
Special Protection Area	SPA	A designation under the European Union Directive on the Conservation of Wild Birds.

<b>Term</b>	<b>Abbreviation</b>	<b>Explanation</b>
Walkers, cyclists and horse riders	WCH	Walkers, cyclists and horse riders.
Wider Network Impacts Management and Monitoring Plan	WNIMMP	Summarises the work undertaken to date to identify and assess areas of the road network where monitoring and potential interventions may be necessary to better manage additional traffic as a result of the Project.

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