

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

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

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

### **Version 4 Submission 15 December 2023**

#### **Notes:**

- This summary statement sets out in brief terms the main concerns and proposed remedies of Gravesham Borough Council. More detail will be found in other documentation that has been submitted to the Examining Authority.
- It is derived initially from not agreed document APP-125 5.4.4.6 Statement of Common Ground between National Highways and Gravesham and uses the same structure, and as updated by National Highways in their submission of 18 July 2023 REP1-100 (clean) and REP1-101 (tracked changes). A fresh version of this will be submitted by the applicant at Deadline 9a.
- Some additional points have been added as a result of the comments on the Gravesham Relevant Representation (pages 49-71 of REP1-180) and other matter raised during the Examination
- The Council takes a holistic view of the impacts from the scheme on its residents and businesses regardless of where responsibility for particular matters may formally sit
- There are some additions arising from analysis the application ('DCO'), which for the most part are covered by specific items in the Statement of Common Ground. These have been grouped where possible but equally some points have been disaggregated where some elements can be agreed but others cannot
- For avoidance of doubt when considering environmental impacts that includes those arising from the substantial utility diversions proposed
- As this is the final version each item is either (though split in some cases):
  - Matter not agreed, or
  - Matter agreed

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<b>Draft DCO and consents</b>					
GBC001	DfT not appropriate body for decision making on Requirements	2.1.1, 2.1.150 & 2.1.156	SoS cannot continue to be judge and jury. The lack of an appeal mechanism for National Highways implies that consent will be given.	Decision making should rest with the appropriate body (County, District etc.) depending on topic. Must be a clear protocol of consultation prior to any Requirements submissions and funding for the work involved by Gravesham Council. See <a href="#">REP1-236</a> ISH2 submission item 4 (d) page 6	Matter not agreed on decision making.
GBC002	National Highways	DCO, 2.1.150 & 2.1.156	National Highways assume that other public bodies do not need additional funding to deal with the extra demands imposed on them by their scheme. Gravesham BC, Kent CC, Health	For GBC agreement under s.106 to fund costs of monitoring and dealing with Requirement applications, monitoring and other matters. Alternatively, a Fee Schedule could be included in the DCO.	S.106 reluctantly signed covering agreed staff costs (two posts and contributions to others). Still discussing with National Highways potential additional resources,

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			Authorities and the Emergency Services are examples of agencies that will incur additional expenditure. There is no reason to treat National Highways in any different way to a private developer.		especially in relation to housing and planning enforcement.
GBC003	Scope of the DCO	2.1.154	The draft DCO fails to make provision for improvements at Blue Bell Hill (A229) which are necessary to allow the A122 to function.	Either include a scheme as associated development or commit to fully funding the scheme that KCC is developing.  KCC LIR provides more information on issues at Blue Bell Hill	Matter not agreed  Grampian style requirement included by GBC in its list of amendments to the DCO at D9 (also submitted previously)
GBC004	Design and construction detail issues	DCO & 2.1.155	The draft DCO has to allow for some flexibility but at present it contains too much ability to modify the scheme to	Provide greater detail about specific design and construction details in either the DCO or supporting documents which there is a	Matter not agreed  Most suggestions made as to improvements to

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			the detriment of local residents and road users on the grounds of expediency.	commitment to comply with, unless specifically justified otherwise. Kent Roads & Tunnel contractors now appointed so this may allow progress after the close of the Examination	REAC etc. have not been adopted See list of proposed amendments to Control Documents submitted at D9
GBC108	Use of single TBM	New 2.1.199	Issue raised in National Highways Minor Refinements Consultation of possible use of a single TBM to construct Thames tunnels rather than two	Ensure that dDCO and control documents prevent spoil and other operations occurring on Kent side	Matter Agreed <u>in principle</u> Requirements MW009 & MW017 have been added considered and response provided in answer to ExQ2 Q8.1.1. Detailed amendments suggested - See list of proposed amendments to Control Documents submitted at D9

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<b>Need for Project</b>					
GBC005	Project meeting its objectives	2.1.2, 2.1.169 & 2.1.175	The application as submitted does not provide sufficient justification to meet the claimed seven objectives when set against negative impacts. BCR is marginal	The scheme should not proceed in principle.	Matter not agreed The applicant has not changed their position in the course of the Examination, but that has shown that there were serious deficiencies in the application and weaknesses in the applicants business case.
GBC006	Local economic growth	2.1.3	Gravesham does not feel that the Borough will greatly benefit from the scheme, and in the short and long term there are major disbenefits.	Local community suffers significant negative impacts from construction, albeit this brings additional employment opportunities. Operation has impacts but without major economic gains that would justify it. Due	Matter not agreed The applicant has not demonstrated any substantive economic benefit for Gravesham

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				to the constraints of AoNB, Nature Conservation and Green Belt there is a lack of supply of new employment land	
<b>Planning Statement / Policy</b>					
GBC007	Green Belt	2.1.4 & 2.1.5	Green Belt 'special circumstances' justification is deficient, so the decision maker does not have the necessary information to make an informed decision. A robust and transparent assessment of the harm to the Green Belt in terms of its spatial and visual impacts and to the national and local	<p>Revise 7.2 Planning Statement Appendix E needs to be revised to enable the ExA to reach a view on it.</p> <p>In response to ExQ1 13.1.20 the Council submitted an outline appraisal at <a href="#">REP4-291</a>. ExQ2 Q13.1.2 &amp; ExQ2 13.1.3 seek further information on this topic</p>	<p>Matter agreed</p> <p>Scheme is inappropriate development in the Green Belt</p> <p>Matter not agreed</p> <p>The applicant's second Green Belt report [<a href="#">REP7-181</a>] fails to provide sufficient detail to allow the ExA to form a view and they have failed to demonstrate very special circumstances that</p>

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			Green Belt purposes is needed.		clearly outweigh the harm.
GBC008	Route alignment impact on Local Plan	2.1.6 & 2.1.162	Impact of scheme, including utility diversions, on potential development opportunities on the east side of Gravesend. The availability of highway capacity in the network because of the scheme to support development in North Kent.	Upgrading local road element of junctions along A2 (Pepper Hill / Tollgate etc). to ensure capacity for development and other appropriate measures where flows increase. Funding for the traffic modelling to establish what is required (as required by NH Spatial Planning Team) and where relevant commit to funding for LTC impact.  See <a href="#">REP1-241</a> KCC LIR Appendix B for junction issues from modelling using the Kent Model. REP7-198 provides a summary update on the modelling and the full report as Appendix B	Matter not agreed. Modelling WSP carried out for KCC, constrained to LTAM, demonstrates that there are significant potential issues without any new Local Plan allocations in Gravesham or wider development in North Kent (especially Medway). It remains unclear whether the scheme as designed could be further enhanced to accommodate the higher levels of growth sought be

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					<p>the Government given the policy and environmental constraints.</p> <p>Adequate monitoring is required to establish actual impacts, whether the project is the cause, and take appropriate action (which needs to be funded). Silvertown approach is commended.</p>
GBC009	Alternatives schemes & design parameters	2.1.7 & 2.1.8	Alternative schemes at the Dartford Crossing have not been properly and comparatively reassessed since route choice in 2017 despite significant change in circumstances. The	Revised scheme focussed on Dartford Crossing to address the point of greatest demand.	Matter not agreed Green Belt, biodiversity and AoNB landscape evidence all place a heavy negative weight on the planning balance. This is in the



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			existing scheme could be designed for lower speeds to allow for a more compact footprint and therefore less environmental impact		context of a weak business case.
GBC010	Lack of non-car travel proposals in the application	2.1.9	The project (apart from PROW diversions) is entirely car based and so does not address the transport strategy for the area or national policy of sustainability.	Positive support for local public transport and active travel modes (including Tilbury Ferry) and be part of a larger committed strategy.	Matter not agreed Response largely focusses on PROW which was explicitly not the issue being raised.
<b>Consultation and Engagement</b>					
Covered by comments made in our Adequacy of Consultation response <a href="#">AoC-007</a> Gravesham Borough Council Adequacy of Consultation Response – but some points relevant at this stage picked up under other headings. 2.1.10, 2.1.11 & 2.1.148 in SoCG cover some of the points raised.					
<b>Land and Compulsory Acquisition</b>					

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GBC011	Land acquisition at rear of Cascades Leisure Centre site	DCO & 2.1.73 & 2.1.198	Loss of pitch and putt facility (Par-3) and need to agree replacement as well as compensation for impact on Cascades site operations	Agreement needs to be reached – studies, discussions, and negotiations ongoing  The issues were explained at CAH3. Offer has been made to the Council	Matter not agreed but negotiation of Head of Terms is in progress  Broad outline of a deal agreed and Head of Terms just received between D9 and D9a but there has not been sufficient time to agree these. See D9a submission for further information.
GBC012	Viability of farm holdings impacted by scheme – in particular, the site at corner of Thong Lane and Rochester Road (A226). Includes the nitrogen compensation sites.	2.1.13 & 2.1.42	Question over land holdings impacted by scheme and in particular the A226 corner site which becomes isolated from the farming unit further east	Answer to the questions posed in the SoCG items  Rochester Bridge Wardens raised issues on this and land on the marshes in CAH4 – see transcript EV-060 p.10-29	Matter not agreed
GBC013	Landscape maintenance	2.1.14	Reassurances that landscaping and	REAC LV003 provides for 5 years for initial	Matter agreed

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			planting will be maintained in the longer term.	establishment – longer term required.	National Highways have confirmed in meetings commitment to maintain land, possibly through third parties, acquired for the new/expanded highway, and for the mitigation and compensation areas.
GBC113	Special category Land	2.1.170	Section 131 and 132 land and their replacement	Shorne Woods, Roman Road, Cyclopark and at Cascades	Matter agreed At Cascades precise location will depend in part on the layout of the new recreational uses on the former Southern Valley Golf Course land
<b>Design – Road Tunnel and utilities</b>					

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GBC014	A2 junction	2.1.12	3D model or cross sections (under AoC in SoCG) – see also GBC067 for landscape implications.	Provide information to understand impact of junction in the landscape.  Fresh information supplied at <a href="#">REP7-189</a> in response to ExQ2_12.3.1	Matter not agreed  Additional information demonstrates the impact of this junction and importance of failing to providing this earlier
GBC015	Chalk Park	2.1.15	Design purpose and function of the new open space.	Introduction of alien design features into the landscape of open fields.	Matter not agreed  Council remains concerned about the design and functionality of Chalk Park as a replacement for the formal golf course  See amendments to article 6 (limits of deviation) of the DCO proposed by GBC in its list of amendments to the DCO at D9

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					See proposed additional REAC commitment relating to active leisure in list of proposed amendments to Control Documents submitted at D9
GBC016	Lighting	2.1.16 & 2.1.173	Landscape impact of lighting in areas where not currently found.	Assurances as to light spill – forms part of landscape issue. See Gravesham LIR Appendix 7b	Matter agreed That the design and modern technology will minimise the spill Matter not agreed Cumulative effect of additional and new road space and traffic (headlights) will impact on the AoNB and the area between east side

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					of Gravesend and Thong
GBC017	Marling Cross junction (Point changed from earlier PADS to conform more closely with the SoCG – see also GBC008 for wider traffic concerns)	2.1.17	Design of junction and its connections at Statutory Consultation.	Concern over connections from junction and their impact on local roads	Matter Agreed Design changed and the Council regards it as necessary if the scheme proceeds to provide connectivity
GBC018	Monitoring of road network in construction	DCO & see also 2.1.58 (GBC042)	Real time monitoring of actual flows on network (strategic and local) with appropriate set of mitigation measures in the event of significant congestion issues.	Commitment to appropriate monitoring and corrective action if required.	Matter not agreed <a href="#">REP9-231</a> 7.12 Wider Network Impacts Management and Monitoring Plan is not considered sufficient to address the issues and the Silvertown approach as proposed by Port of London Tilbury [REP6-160] is commended

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GBC019	A122/A2 junction and related local link roads	2.1.18, 2.1.19 & DCO	Analysis how A2/A122 junction will function similar to the microsimulation analysis carried out at A13 Orsett Cock junction – in particular the impact of the 2 lane sections on the A2 to M2 mainline flow and the capacity constraints on the frontage roads linking the A2(T) to A289 and A2 (local road).	<p>Micro simulation or other appropriate method to ensure the junction functions correctly and does not have any knock-on effects on local road network.</p> <p>Microsimulation (or other) work needs to be supplied to enable view to be taken on the detailed operation and impacts of the scheme.</p>	<p>Matter not agreed. Some development work referred to in Table 3.2 of <a href="#">REP3-126</a> 9.15 Localised Traffic Modelling v2.0</p> <p>The issues raised to date by the Orsett Cock microsimulation model cast doubt on the degree of weight that can be attached to LTAM results for complex junctions. The logical outworking of this is for monitoring of all junctions identified in the WSP work and a commitment to resolve issues that are a direct result of this project</p>

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GBC020	Thong Lane Car Park	2.1.20	Objection to provision of facility as inappropriate development in the Green Belt and attracting traffic through Thong from urban area.	Site restored as landscaping after having been a works site. Overall car parking strategy for wider area (involves third parties).	Matter agreed Car park proposal deleted and not sought by KCC. Site to be landscaped as surrounding area
GBC021	Width of Green Bridges	2.1.21, 2.1.22 & 2.1.23	Further increase in width of green bridges to benefit landscape and increase biodiversity linkage.	Thong Lane south and Brewers Road. Brewers Road space limited, Thong Lane south could be widened and could replace Park Pale bridge as a further option.	Matter not agreed GBC position on the Green Bridges is that they should be wider in centre if not at the landing points See proposed amendments to Design Principles submitted at D9
GBC109	Smart motorway design standard on A122	2.1.161	Design Standard proposed for A122 has raised concerns over safety. NB: not about formal road	Concerns over safety aspect of A122 with no hard shoulders	Matter not agreed



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			designation but how the road looks, feels and operates		
<b>Construction Impacts (CEMP/CTMP)</b>					
GBC022	S106	DCO and a number of SoCG points	Current s.106 agreement does not address the monitoring functions that were being asked for	The Council made a comprehensive statement of draft heads of terms to National Highways <a href="#">[AS-070]</a> . Some of these fall to other IP's and some items have been addressed (e.g. Air Quality monitoring but then no PM2.5). The overall response to these has not been positive.	Matter not agreed Will need to discuss with contractors how far progress can be made in the construction phase. Monitoring of operational impacts (including lack of them) remains a concern
GBC023	Construction programme	2.1.157	Insufficient detail to allow proper understanding of potential impacts in the 5 ½ year construction period. Understanding control of access to	Clearer and more specific programme (appreciating the inherent uncertainties). This is fundamental to understanding impacts on the local community.	Matter not agreed

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			construction sites from a safety and anti-social behaviour point of view (downside is visual impact).	Appointment of Kent Roads and Tunnel contractors may assist in taking some of these issues forward	
GBC024	Workforce accommodation	2.1.24 & 2.1.38	Council does not believe that there is sufficient capacity in the local housing market to accommodate additional demand from the construction workforce in a very constrained supply situation. Regular monitoring of workforce to see where they are living and how they are travelling so mitigation measures can be adjusted to suit.	The Council has set out a range of practical solutions to NH in our s.106 draft heads of agreement. Clarity about use of Inn on the Lake Motel which in the DCO application is mooted as an accommodation site as previously suggested by GBC. Monitoring strategy also relevant. <a href="#">[REP9-233]</a> 7.13 Framework Construction Travel Plan v4.0 has been amended but this is insufficient in the Council's view	Matter not agreed Additional information submitted on existing pressures on local housing market and the issues faced by the Council as housing authority in <a href="#">REP8-130</a> , <a href="#">REP8-132</a> & <a href="#">REP8-133</a> See proposed additional requirement in list of proposed amendments to the DCO in its list of amendments to the DCO at D9

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					Alternatively see amendments to Framework Construction Travel Plan in list of proposed amendments to Control Documents submitted at D9
GBC025 Check	Effect on living conditions	2.1.25, 2.1.28, 2.1.30 & 2.1.31	Impact on all property adjoining the construction sites – vulnerable house at Polperro and caravans at Viewpoint Place on A226 plus along Thong Lane (including Thong itself). Clear strategy and mechanisms for consulting and informing local residents and businesses during	New site for caravans / rehousing should be offered and adequate measures and monitoring to reduce impacts. Set up appropriate mechanisms. NB: these must work seamlessly across the construction contract boundary along Thong Lane between Kent Roads and Tunnel contracts  Adjoining property issues not addressed	Matter agreed  Fresh proposals which will need to be worked through when details of construction site layout and timetable are known in relation to the traveller site and more generally (e.g. properties on the east side of Thong Lane)

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			construction of what is happening. To include a complaints procedure to deal with issues as soon as possible.	CoCP agrees with complaints commissioner <a href="#">[REP9-184]</a> 2.1.30 & 2.1.31 are about cumulative impacts on the community	
GBC026	Use of the river and access thereto	2.1.26 & 2.1.27	Note proposed river use on Thurrock side and intention to keep spoil, apart from contaminated, on site. Also, the need to import significant amount of material for A122 to A2/M2 eastbound slip.	Undertaking to keep issue live as construction programme evolves but could require additional land to be included in the development boundary. Not using River Thames on Gravesham side – information on 1 TBM confirms pipeline for slurry from Kent to Thurrock, and use of new bore to transfer tunnel segments etc to northbound tunnel. Northfleet terminal best option for River transport for south side of Thames	Matter agreed The current spoil strategy Matter not agreed Support the PLA in seeking more active use of the river. Repeat the advantages of Northfleet site with road, rail and water access

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GBC027	Hydrology impacts	2.1.32, 2.1.136 & 2.1.165	Impacts on hydrology from construction (soil stripping) and spoil storage (surface runoff) on local watercourses, roads and property.	Clear strategy for avoiding any surface flooding or related matters.	Matter agreed Concerns raised but will need to be worked through with the appropriate authorities and action taken if, for example, surface run off occurs onto A226
GBC028	Access to works compounds for workers	2.1.33	Travel to works sites by workforce, parking and related issues as unlike HGV's not constrained.	Fuller understanding of 7.14 oTMPfC given uncertainties in worker accommodation. See GBC024.	Matter agreed Concern is if significant additional cars and vans use the local road network to access construction sites. Needs conversation with the contractors on how they will manage the labour force (own staff and contractors). Visit to HS2 showed how it

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					could be approached
GBC029	Local Road Network access points	2.1.34, 2.1.36 & 2.1.180	CA2 access via A2 Marling Cross junction and A226 in and out for CA3 – potential impacts on traffic, footway and cycle lanes.  Includes concerns over access to the Thames View Crematorium	Knock on impacts on LRN and maintenance of routes along A226.  Existing cycle lanes and footway need to be maintained safely on A226, particularly where the accesses to the southern portal construction site come off the A226	Matter not agreed  Uncertainty over impacts of HGV's using the Marling Cross junction to access the A2 construction site – certainly in the AM & PM peaks this junction is already operating at capacity (from east Gravesend towards London bound A2 in morning and reverse in evening). Diverting traffic may cause issues elsewhere on the local road network.

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GBC030	Wider effects of construction access	2.1.39, 2.1.41, 2.1.42 & 2.1.179	Overall impact from disruption on local roads (including Marling Cross junction from access sites CA2/3 and on A226) and A2 (including perception thereof) on local businesses and services – including implications from 24 hour working. Impacts on settlements Chalk, Lower Shorne, Higham and Thong as well as Thong Lane residents.	Monitoring and action plan if issues arise plus local liaison arrangements and speedy issue resolution.	<p>Matter agreed</p> <p>Volume of material to be imported significant but framework for its discussion</p> <p>Matters not agreed</p> <p>The general disruption to the east side of Gravesend and the west site of Shorne Parish from all the construction activity and potential difficulties in moving around. Need active monitoring and appropriate measures implemented at speed (since ebb and flow of construction</p>

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					activities may be significant over time).
GBC031	Local effects	2.1.40 & 2.1.35	Noise and disturbance to local residents from construction process particularly in the Thong/Riverview Park/Thong Lane/Thong areas.	Minimise impacts on local residents – which includes perception of access issues which may harm businesses in the area.	Matter not agreed Concern remains over local implications for noise and disturbance – discussion with contractors may assist, including about monitoring
GBC032	Temporary diversions	2.1.43	Impact of closures – particularly Brewers Road.	Mitigation measures for impact on Local Road Network – including impact of poor access to Shorne Woods Country Park.	Matter not agreed Welcome attempt to limit time period of closure but still imposes significant impact on the local community with diversions in an already disrupted environment due to ongoing



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					construction work. Note KCC is seeking compensation for loss of revenue to Shorne Woods CP, which shows the issue exists
GBC033	Impact of Milton (CA3b) construction site adjacent to Thames & Medway Canal	2.1.163	Concern over the possible implications for Thames & Medway Canal and stability of the North Kent railway.	Clarification and what might be done if issues arise from tunnelling operations or extraction of the Ground stabilisation tunnel boring machine (if needed). See GBC078	Matter agreed Monitoring in place is this very sensitive location should the Ground stabilisation tunnel be needed
GBC108 New	Complaints Commissioner	2.1.29	During construction on basis of previous experience a independent ombudsman is helpful in resolving significant disputes	Has now been included in ES Appendix 2.2: Code of Construction Practice <a href="#">[REP5-048]</a> and oTMPfC <a href="#">[REP7-148]</a>	Matter agreed
<b>Operations and Maintenance</b>					

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GBC034	Access and incident access times	2.1.45	Emergency services access to tunnels in the event of a major incident within acceptable travel times noting the absence of a hard shoulder and the need to fund additional resources (as necessary) for them.	Needs input from Emergency Services as to whether project as currently designed meets their needs.  Emergency Services Group remains concerned over a number of issues – see their SoCG to be submitted at D9a	Matter not agreed  Emergency Services group remains concerned about access times in case of major incidents on congested routes
GBC035	Evacuation from tunnels	2.1.46	Handing of any drivers and passengers evacuated from tunnels in the event of a major incident. Southern portal is 28m below ground level. Emergency Services need to be happy with cross passage spacing.	Clarification for Local Authority role and Emergency Services need to agree emergency plans. See SoCG to be submitted at D9a	Matter not agreed  Number of issues including access to southern portal and spacing for cross passages in tunnel and the relationship with fire suppression systems.

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GBC036	Rendezvous point at Chalk	DCO & 2.1.46	<p>Function and location of RVP understood – clarity needed on what facilities it has (buildings, lighting, surface etc.) and maintenance thereof</p> <p>Plan received of potential helicopter landing location. Understood that Marling Cross to A122 slip is secondary RVP location, which will be closed in any case of incident closes the tunnels</p>	<p>Development in Green Belt – but as a facility that needs to be ready for use at any point</p> <p>Emergency Services group wants greater clarity which leads onto the planning issues that may arise</p>	<p>Matter not agreed</p> <p>Greater clarity needed on precisely what will be needed on the ground and how it interacts with the access link off A226 and PROW associated with Chalk Park</p>
<b>Charging</b>					
GBC037	Congestion charge on Lower Thames and Dartford crossings	2.1.47, 2.1.48, 2.1.49, 2.1.50 & 2.1.51	Charge discount for local residents should apply to both Dartford and LTC	Agreement to proposal	<p>Matter not agreed</p> <p>National Highways have agreed to discuss the matter further with Department for</p>

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			<p>crossings from start of construction.</p> <p>Suggested that some of the revenue could be devoted to the Community Fund</p>		<p>Transport. Simple request is for parity with Thurrock residents</p> <p>See proposed amendments to DCO in its list of amendments to the DCO at D9</p>
<b>Traffic and Economics</b>					
GBC038	Lower Thames Area Model (LTAM)	2.1.52 & 2.1.55	Model does not adequately reflect the scale of development in the area and therefore cannot be relied upon as to traffic impacts. The reliability of the model on Local Road Network not good enough to give confidence in the results.	Model run that reflects development includes a realistic set of likely development assumptions without TEMPRO constraint to ensure development in North Kent is not constrained.	Matter not agreed Applicant as offered additional run as sensitivity test but that requires North Kent wide agreement for meaningful results. Can be addressed as part of the monitor and manage process

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			This then impacts on traffic dependent assessments such as air quality and noise		
GBC039	DMRB & compliance with EIA regulations	2.1.53, 2.1.54 & 2.1.63	DMRB is only guidance and not to be relied upon in an Environmental Assessment.	Use appropriate guidance and wider interpretation in relation to traffic modelling assumptions	Matter not agreed
GBC040	Tilbury Junction arrangement	2.1.56 & 2.1.44	Tilbury junction reintroduced into the scheme.	Opportunity to re-instate service area to replace that lost at Cobham and address charging facilities for electric vehicles – but a failure to account for the potential benefits and costs of the development it will facilitate (Freeport). Modelling does not take account of the development or assess the impacts of traffic that may result if Tilbury access road built – which will materially alter the	Matter not agreed Necessary technical work not carried out as sensitivity test

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				access times from the south	
<b>Wider Network Impacts</b>					
GBC041	Effect on Dartford Crossing	2.1.57 & 2.1.167	The actual model results show that after 15 years congestion is more or less back to current levels.	Concede that Objective 4 of project is not being achieved by this scheme.	<p>Matter not agreed</p> <p>Material within the application documents speaks for itself – see Gravesham LIR</p> <p>Fact remains that the bulk of traffic wishes to go round London and therefore uses the Dartford Crossing, so that will need additional capacity in any case</p>
GBC042	Impacts on wider road network	2.1.58	KCC concerned about impact on strategic network and local road network from the results of using their transport	Further detailed analysis of the model results and use of more appropriate development levels as inputs. Latest version from applicant is <a href="#">REP9-</a>	<p>Matter not agreed</p> <p>The applicant has not moved on this issue, which includes the debate</p>

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			model with LTAM assumptions.	<a href="#">231</a> 7.12 Wider Network Impacts Management and Monitoring Plan is not considered sufficient to address the issues and the Silvertown approach is commended	about the NNPSN interpretation. The Council agrees with the 'Silvertown' type approach as proposed in more detail by PTOL and Thurrock, and explained by TfL
GBC043	Road asset maintenance	2.1.59	KCC concerned about impact of construction traffic on existing highways which may not be in good condition.	Ensure existing relevant highways are brought up to an acceptable standard to minimise potential impacts during or after construction period from additional traffic.	Matter agreed Matter for KCC to resolve
GBC044	Monitoring	2.1.60	Continuous monitoring of traffic flows needed before start of construction, then very regular updates during construction period with appropriate remedial action if	<a href="#">REP9-235</a> 7.14 Outline Traffic Management Plan for Construction forms a basis for future discussion	Matter not agreed Concerns remain over the impact of construction traffic on local road and access to facilities. Discussion needed with contractors as

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			required. Monitoring at agreed years in the operation phase with a commitment to address any issues that arise as a result of the scheme on both strategic and local highway network.		to how this can be dealt with
GBC045	Cross river resilience	2.1.3 & 2.1.168	Claimed benefit of scheme is increased resilience on SRN but no analysis/modelling to show this is true in the event of major incidents.	Analysis requested on how the strategic road system would operate in the event of a major incident.  Disruptive events happen regularly at the Dartford Crossing – see DP World London Gateway WR REP1-331	Matter not agreed  No response from the applicant on this
<b>EIA General (including REAC)</b>					
GBC046	Comprehensive Monitoring Strategy	2.1.61	Overarching consideration raised	For every topic area, as appropriate, an appropriate monitoring	Matter not agreed



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			in numerous detailed points within SoCG.	strategy and potential remedial actions for both construction and operation phases. Overall reference document with specific commitments in DCO, control documents or s.106 as appropriate.	
GBC047	Comprehensive and interactive mitigation delivery strategy	2.1.62 & 2.1.66	Impact on AoNB and its setting from widening the A2.	AoNB landscape submissions make clear that the ES under assesses the impact. Given that additional mitigation on site is not really possible National Highways agree and fund such a strategy. Contribution to mitigation in the AoNB being agreed	Matter not agreed Commitment to AoNB of funds welcomed, and also support via Designated Funds for looking at the National Nature Reserve concept. There is still a need for the area to be treated in the round and not a series of separate elements.

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GBC048	Impacts on landscape during construction	2.1.65	Size of the construction sites on east side of Gravesend impacts for a long period on the setting of the AoNB.	No obvious mitigation possible, compensation may be the only route.	Matter not agreed Needs discussion with contractors given lack of movement by National Highways
GBC049	Cumulative and in combination impacts on local communities	2.1.67	Impact taken in combination on Riverview and Westcourt Wards.	Enhanced mitigation and compensation.	Matter not Agreed Further discussions required
GBC050	Land reinstatement and vegetation	2.1.68	Speedy reinstatement and early planting where possible.	Commitment.	Matter agreed REAC LV002
<b>Socio-economic</b>					
GBC051	Use of local labour & implementation of SEE measures	2.1.69 & 2.1.70	Agreed skills and employment strategy with specific commitments and targets.	Clear implementation mechanisms. <a href="#">REP9-241</a> 7.21 Stakeholder Actions and Commitments Register	Matter Agreed SEE strategy now incorporated into SACR as well as small contribution

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					towards staff time in the S.106.
GBC052	Southern Valley Golf Course	2.1.71	Loss of important leisure facility with no active recreation replacement.	Active leisure replacement.	<p>Matter not agreed</p> <p>This is separate from Cascades land issues. Lack of replacement organised outdoor sports facility</p> <p>See proposed additional SACR commitment in list of proposed amendments to Control Documents submitted at D9</p>
GBC053	Shorne Wood Country Park access	2.1.72 & 2.1.201	Impact of Brewers Road closure both on local highway network and operation of the facility and what it supports.	Possible revenue support (matter for KCC) – but principal applies wider.	<p>Brewers Road closure - Matter not agreed</p> <p>Impact on Shorne Woods CP – matter agreed form from GBC perspective</p>

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					KCC having discussions on potential revenue loss compensation and publicity for the Country Park
GBC114 New	Impact on other tourist facilities during construction	2.1.177	Actual and perceived access difficulties to historical, leisure and tourism focussed businesses	Application of same principle as to Shorne Woods CP	Matter not agreed  Publicity would be one way of addressing this as being discussed with KCC for Shorne Woods CP
GBC115 New	Impact on businesses that are displaced	2.1.178	That such businesses are given some assistance to find new premises over and above standard compensation	Commitment to provide assistance to firms affected	Matter not agreed
GBC054	Business disruption and effect on Cascades Leisure Centre	2.1.73	Road closures / restrictions / noise / dust impact on outdoor and indoor	Potential revenue support for impacted businesses. Clear understanding of the implications for	Matter not agreed  No serious discussions but KCC Shorne

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			activities, and business disruption (including access)	Cascades of all the phases of the construction process.	Country Park agreement, if concluded, could form a basis
GBC055	Community Fund (principle)	2.1.74 to 2.1.77	Support the broad principle but size of funding pot, criteria for grant distribution and operating mechanisms need to be reviewed.	Need to review scheme as recently advertised.	Matter Agreed subject to detailed point about indexation method  Now in SACR REP8-090 See <a href="#">list of proposed amendments to Control Documents</a> submitted at D9
<b>Air Quality</b>					
GBC116	Use of the latest version of the Emissions Factor Toolkit	2.1.78	To ensure forecasts are as up to date as possible	ES Chapter 5: Air Quality [ <a href="#">APP-143</a> ] and Gravesham Borough Council's Local Impact Report Appendix 5 (Air Quality) [ <a href="#">REP1-231</a> ]	Matter Agreed

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GBC056	PM <sub>2.5</sub>	2.1.79	Need for monitoring of this pollutant that has no safe limit.	Further information sought on methodology used in ES and that new standard has been taken into account. May require additional monitoring solutions to be funded.	Matter not Agreed PM <sub>2.5</sub> monitoring not agreed
GBC057	Air quality mitigation	2.1.80	Long term monitoring strategy and potential actions. Predictions are in the context of concerns over LTAM development quantities GBC038.	Monitoring Strategy supported by multiple potential actions and access to the information.	Matter not agreed Offer made of the monitoring equipment from construction phase but no revenue to support maintenance, analysis, or relocation of equipment
GBC058	Local road network impact	DCO & 2.1.54	Given concerns over LTAM development quantities etc, knock on impacts on LRN from greater traffic on SRN.	Fresh analysis taking the listed points into account.	Matter not agreed. Local road impacts discussed at ISH4, ISH10 and ISH14 which revealed a fundamental

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					disagreement between National Highways and most other interested parties. Work for KCC by WSP also relevant.
GBC059	Nature Conservation Impacts	DCO & 2.1.141	Ammonia deposition and other pollutants impact on existing habitats and proposed planting.	Further information requested on ammonia model as there is no standard nationally.	Matter not agreed Note that Hole Farm is a Designated Funds project and not a mitigation for nitrogen deposition impacts south of the river. Model better understood but not subject to external audit.
<b>Historic Environment</b>					
GBC060	Archaeological investigation	2.1.81	Ensure sufficient archaeological investigation of sites in advance of	KCC Archaeology satisfied with general approach, but Southern Valley Golf Course and	Matter agreed KCC Archaeology reaching agreement on methodology

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			construction works – see also GBC110 below if significant finds are made	nitrogen deposition mitigation sites need examination	and Gravesham content with the approach
GBC061	Setting of Heritage Assets	2.1.82 & 2.1.84	Detail of landscaping and other mitigation around the Thong Conservation area and implications for Cobham Park	Suitable solution to be developed Applicant rests on assessment in ES Chap 6. <a href="#">REP1-232</a> Gravesham LIR App.6 provides more information	Matter not agreed Applicant has failed to consider heritage issues in the round as opposed to asset by asset. Impact therefore undervalued
GBC062	Cobham Estate (historic Darnley lands)	2.1.83	Failure to consider the wider heritage context of the proposal	Suitable solutions to be developed in heritage See above	Matter not agreed Insufficient attention to the historic landscape of the Cobham Estate on which the entire project in Kent sits
GBC063	Methodology used in ES assessment	2.1.152 & 2.1.181	Confused methodology not applied correctly with too much focus on	Rewrite using consistent methodology See above	Matter not agreed See ExQ2 Q12.1.1 and responses.



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			individual impacts and no the aggregate		Impact therefore undervalued
GBC110	Missing archaeological investigations	2.1.153	Areas to the east of Gravesend including Nitrogen deposition sites and Southern Valley Golf Course	Programme of work	Matter agreed See response in GB060 above on methodology Matter not agreed The scheme may need to change and adapt if significant archaeological finds are made, and preservation in-situ is the appropriate response
<b>Landscape and visual</b>					
GBC064	Major compensation package required	2.1.104 & 2.1.105	Combination of Landscape, Historic and Natural Environment impacts on the Cobham Estate.	Substantial funding covering the former Cobham Estate lands (with flexibility) for delivery of an overall comprehensive plan that needs to be developed	Matter not agreed Kent County Council UU contains funding for a major compensation scheme in the

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				Note there is a study under way, funded by Designated Funds, by Kent Downs AoNB unit across the area	AoNB. Gravesham wants this focussed on the Borough
GBC065	Kent Downs AoNB	2.1.64 2.1.85, 2.1.87 & 2.1.89	Impact on Kent Downs AoNB (and Green Belt) and its setting from dramatically increased severance and urbanisation from project. Creates 12 lanes (14 if Park Pale included) with no vegetated central reservation, plus the loss of woodland on the north side to create the utilities corridor and hard surface for cycleway to the south of HS1 in Cobham Park.	The scheme should not proceed in principle.	Matter not agreed As clearly set out in ISH11 the applicant has understated the impact of the project on the AoNB which is Large adverse and should lead to the scheme rejection as part of the planning balance

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GBC066	Retaining existing planting and loss of HS1 planting	2.1.86 & 2.1.90	Maximise the retention of the existing mature planting (e.g. in sandwich lands between A2 and HS1).	Objective of scheme	Matter not agreed Plans and visual representations show most of what exists destroyed and limited replanting due to the amount of highway inserted into the landscape
GBC067	Visual intrusion of A2 junction	2.1.88	3 level junction in the setting of AoNB and visual intrusion for local residents as can be seen by the renderings from various viewpoints.	Mitigation strategy and detailed design See also GBC014	Matter not agreed Visual representation of this junction inadequate throughout process and that recently supplied views from Thong Lane bridge <a href="#">[REP7-189]</a> visualisation reveals the major impact the junction has

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GBC068	Southern portal	2.1.91	Jarring landscape feature in view out over the Thames.	Mitigation strategy and detailed design.	Matter not agreed Appreciate commitments on portal detailed design but still a jarring feature in the landscape as you look out over the Thames and marshes
GBC069	Road / landscape integration	2.1.92	Scheme has developed piecemeal (e.g. adding nitrogen sites compensation) and needs a comprehensive overview.	Mitigation strategy and detailed design.	Matter not agreed
GBC070	Woodland corridor north of A2	2.1.93	Striking a balance in the area north of Park Pale between tree cover, a more parkland like landscape and long distance views.	Detailed design.	Matter not agreed Insufficient detail to ensure this area provides a parkland setting with appropriate views

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			Drainage pond and area east of Harlex site need to be integrated into the scheme.		
GBC071	Setting of Thong	2.1.94 & 2.1.95	Landscape around Thong is going to change significantly to the west due to the A122 cutting and its screening and to the east by proposed planting. As a conservation area with a number of non-designated heritage buildings the setting needs to be preserved so far as possible the open setting backed by woodland to the west (Claylane Wood) and the east (Shorne Woods).	Detailed design.	Matter not agreed The scheme destroys the current setting of the conservation area by the insertion of the road on the west side and the proposed design of the mitigation on the east. Should be an agricultural setting framed by the woods

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GBC072	Chalk Park	2.1.96	Design of Chalk Park, its function etc. Design Principles quoted include references to 'where reasonably practical' or similar which gives too much flexibility	Detailed design and function of Chalk Park, which cannot be delivered for many years	Matter not agreed Concerns remain about the landform (from chalk disposal) and functions in the site will perform
GBC073	Shorne lfield Road	2.1.97	Planting to south of Shorne lfield Road (was to north).	Detailed design.	Matter agreed
GBC074	Tilbury Fields	2.1.98	Views across river to new higher landscaping (NB: Shornemead Fort just designated a Scheduled Ancient Monument).	Visual intrusion and whether changes are justified by the wider context.	Matter not agreed The Council will expect further consultation in the detailed design phase
GBC075	New areas of planting	DCO, 2.1.37 & 2.1.187	General issues over establishment, maintenance impact of climate change, and the long-term	Long term maintenance plan and recognition that benefits only fully accrue when planting mature.	Matter agreed

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			management of new planting areas.		
GBC111	Assessment methodology	2.1.159, 2.1.184 & 2.1.185	Changes to methodology and its application between 2020 and 2022 applications downgrading the impact. Also, interpretation of DMRB LA 104 and the overall assessment	ExQ2 Q12.2.1 and subsequent submissions	Matter not agreed Applicant has failed to justify their approach which confirms the serious impact on the AoNB
<b>Terrestrial Biodiversity</b>					
GBC120	Sufficiency of survey work	2.1.188	Concerns from KCC Ecology over adequacy of survey work	Requirement 7	Matter agreed
GBC076	Environmental Impact of junction	2.1.99 & 2.1.183	More generally impact of loss of vegetation and time taken for new planting to establish.	Views after 15 years do not allow for fresh disturbance if the scheme is further developed over time. Also rests on	Matter not agreed See GBC014 above

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				assumptions as to actual growth achievable which may vary	
GBC077	Hedgerow reinstatement	2.1.100	Retain existing field patterns – significant losses but also proposed net gains.	LSP.13 needs strengthening.	Matter agreed
GBC112	Connection between impact and proposed mitigation/compensation	2.1.166	Clarity on what relates to what (NB separate to the need for a clearer overall strategy)	9.90 Mitigation Route Map	Matter not agreed Linkage remains unclear though route map is a useful addition
junctionGBC078	Marsh restoration	2.1.101 & 2.1.196	Impact on North Kent Marshes from ground stabilisation tunnel and enhancements to habitat and possible pollution from water discharge Also, displacement of dog walkers due to PROW closures during construction and maintenance of	Possible actions if stated objectives are not achieved Addressable by monitoring strategy	Matter not agreed



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			the enhancement agreed with Natural England		
GBC119	North Kent Marshes	2.1.186	Concerns over potential impacts on SSSI/Ramsar and monitoring	REAC	Matter agreed
GBC079	Effects on existing habitat replacement (CTRL)	2.1.102	Loss of HS1 landscaping in sandwich lands from M2 J1 to Marling Cross junction (including some from A2 widening).	Clear connection set out between what is lost and mitigation/compensation.	Matter not agreed See GBC066 above
GBC080	Utility corridor diversion impacts	2.1.103 & 2.1.149	Loss of ancient woodland even though reduced on what was originally proposed is still significant (Shorne Woods and Claylane Wood).	Compensation strategy clarity on replacement planting and ratios.	Matter not agreed Significant habitat loss and landscape impact. Compensated rather than mitigated

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GBC081	Incremental changes and EMP	2.1.104	General concern at the lack of integration between various mitigation and compensation measures.	Drift to the design objectives and related processes in detailed design.	Matter not agreed See GBC064
GBC082	EMP	2.1.105	Need a wider management plan for Cobham Estate area including ammonia sites.	Funding for this over and above what is being committed via Designated Funds to look at the concept of a Special National Nature Reserve. See GBC064 update	Matter not agreed See GBC064
GBC083	Biodiversity net gain	DCO & 2.1.197	Concern over loss of irreplaceable habitats (veteran trees and Ancient Woodland) and that south of the river biodiversity net gain is only 3% compared with 7% for the project as a whole.	More biodiversity net gain south of the river.	Matter not agreed

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<b>Noise, Vibration and Light</b>					
GBC084	24 Hour working at southern portal	2.1.106	Ensure minimal disturbance to local residents.	Construction detail. See action points to ISH8 <a href="#">[REP6-126]</a>	Matter not agreed See proposed amendments to CoCP Table 6.1 in the list of proposed amendments to Control Documents submitted at D9
GBC085	Noise barriers removed	DCO & 2.1.190, 2.1.191 & 2.1.192	Reliance on use of low noise surface whose effectiveness decays with time. Concerns in context of LTAM modelling – see GBC038. Landscape benefit from their removal.	Undertaking on maintenance/replacement and potential mitigating actions. Further technical discussions.	Matter not agreed Potential for noise impacts at Thong and Riverview if low noise surface approach unsuccessful
GBC112	Noise from additional traffic flow on Henhurst Road	2.1.160	Increased flow on local roads	Falls within ambit of monitoring of local road impacts and taking action where appropriate	Matter not agreed Seek commitment to mitigation if issue emerges in practice

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GBC117	Noise Monitoring	2.1.189	Ensuring adequate monitoring in construction	Appropriate measures via REAC, s.61 etc.	Matter agreed
GBC118	Noise assessment criteria and thresholds	2.1.193, 2.1.194 & 2.1.195	Ensuring appropriate levels etc. and interproject noise	REAC	Matter agreed
<b>Population and Human Health</b>					
GBC086	Timing, form, and function of replacement open spaces	2.1.107	When they will become available for use, what physical form they will take and what needs they are supposed to cater for and how the community can engage.	Agreed programme and process for reaching agreement on each areas form, function(s) and objectives.  No movement but longer explanation of Chalk Park	Matter not agreed  Nothing has been proposed but appreciate that detailed construction programme will be a major factor
GBC087	Construction impacts on PROW	2.1.108 & 2.1.112	PROW impacts information scattered but results in long term closures on the east side of Gravesend.	Access to Shorne Woods CP restricted and local dog walking forced into urban area.	Matter not agreed  Serious impact on east side of Gravesend despite restored link south of Riverview Park

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				Impact assessed in para 13.62 - 108 Gravesham LIR <a href="#">[REP1-228]</a>	and new link to Thong
GBC088	Principle and design of PROW routes	2.1.109	Better understanding of routes in operational scheme but concerns over surfaces that may be used and the resulting urbanisation.	Need to ensure that surfaces are appropriate for a rural Green Belt setting, along with the AoNB and biodiversity considerations.	Matter agreed KCC reaching agreement on these matters
GBC089	Tilbury Ferry	2.1.110	Project provides an opportunity to enhance service during construction as a route between north and south of Thames construction sites and in the longer term to enhance sustainable transport. Ferry forms part of the construction travel plan.	Proposal for enhancing ferry service (hours of operation and Sundays).	Matter not agreed

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GBC090	Cyclists and walkers crossing the River Thames	2.1.111	Active measures of support for walkers and cyclists to cross the river where none is currently proposed.	National Highways to make proposals other than existing facilities at Dartford.  Applicant regards Local Authorities as best placed to deliver – but will need funding	Matter not agreed
GBC091	Impact on NCN177	2.1.113	The temporary route is more indirect and less commodious than the current and the operational version is shorter but still less commodious. Hard surface on temporary not acceptable due to impact on SSSI and historic park.	Major rethink of proposals in both construction and operational phases.	Matter not agreed  No fundamental change in proposals which do not provide a convenient and commodious route in either construction or operation
GBC092	Assessment of cumulative effect on health	2.1.115	Many small impacts cumulate to be significant – and individuals have	Further information and agreement to monitoring strategy.	Matter not agreed  GBC092 to GBC094 encompass

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			different susceptibilities (e.g. asthma suffers and dust). Need for monitoring.		<p>concerns over the health and wellbeing of residents given the extended construction period, traffic, noise, loss of PROW etc. This is not about health of construction workers</p> <p>National Highways has agreed to look at ways that these matters might be addressed in the future</p>
GBC093	Health Impacts Analysis – priorities and construction phasing	2.1.114, 2.1.116 & 2.1.117	Acceptance of the needs for overall monitoring of the impacts separately and in combination. The implications will depend on the vulnerability of individuals, which	Further information and agreement to monitoring strategy. More information on mitigation required as originally set out in GBC s.106 Heads of Terms document <a href="#">[AS-070]</a> – which has not	Matter not agreed See GBC092 above

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			varies. Clearer construction timetable to understand length and severity of various operations. As a specific example, the implications for access and operation of primary schools.	generally been translated into commitments	
GBC094	Health Impact Analysis detailed comment from independent review	2.1.118 to 2.1.134	Series of detailed comments about presentation, data used, actual severity etc.	See above	Matter not agreed See GBC092 above
<b>Road Drainage and Water Environment</b>					
GBC095	AoNB perched water tables	2.1.135	Accept that seeking to avoid but need to understand what might be done if issues arise (e.g. Repton Ponds).	Part of the monitoring plan to explain how this is going to be considered and what action could be taken.	Matter agreed



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GBC096	Drainage attenuation ponds	2.1.137	Introduction of unnatural features into landscape.	Fuller detail of the landscaping and visual impact in the landscape. Applicant refers to APP-156	Matter not agreed Will have to be followed up at detailed design stage or amendment to Design Principles
GBC097	Flood risk assessment	2.1.164	FRA should be for 120 years as that is the design life of the tunnel.	Extended analysis.	Matter agreed Environment Agency & Kent CC content
<b>Climate</b>					
GBC098	Scale of analysis	2.1.138, 2.1.147, 2.1.151 & 2.1.171	Request for analysis of carbon footprint to be done at Local Authority scale so implications for the Gravesham net zero target can be understood.	Analysis should be supplied. Use of hydrogen promoted	Matter not agreed

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GBC099	Exemplar measures	2.1.139	Series of specific asks towards carbon neutrality.	Specific progress towards delivery asks noting that an exploration of using heat from the Thames Tunnel to heat the new Cascades Leisure Centre is being examined via a Designated Funds funded project. This study did not proceed.	Matter agreed
GBC100	Construction carbon objective	DCO	Ambitious targets that may not be deliverable.	Clearer understanding of the risk factors to delivery and potential implications.	Matter not agreed To be discussed further with contractors
GBC101	Long term carbon footprint from operation	DCO	Compatibility with national carbon reduction targets and sustainable transport objectives not clear.	Taken with above are more realistic appraisal considering the role of transport in the overall national carbon budget and emerging government policy.	Matter not agreed
<b>Habitats Regulation Assessment</b>					

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GBC102	HRA	2.1.140	Concern that the adverse effects have not been properly evaluated, especially if the modelled traffic flows do not cover reasonably expected development.	Further analysis of the implications on the basis of transport model run that fully considers reasonable levels of development in North Kent.	Matter not agreed  Issue for Natural England to agree. Council would still point to the potential impact from dog walking when access east of Gravesend is highly restricted during construction
<b>Nitrogen deposition</b>					
GBC103	Site acquisition and long-term management	2.1.141	As further significant extension of land to be acquired and used by the scheme needed to understand how National Highways will ensure the sites are properly managed and maintained	Understand how these relate to the other proposed planting areas and the wider ecology, landscape, heritage and other relevant factors impacting on the wider area	Matter not agreed

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GBC104	Nitrogen mitigation planting sites	2.1.143	Ensure fit with landscape (inc. historic) and local SSSI ecology. Archaeological survey in advance of any works, existing biodiversity etc.	More detail to be clear how the sites fit with the adjoining habitats and those being compensated for	Matter not agreed
GBC105	Detail of proposed planting	2.1.144	How it relates to existing adjoining areas (often SSSI) but in a context of climate change and any specific functions for the site	More detail to be clear how the sites fit with the adjoining habitats and those being compensated for in terms of types of planting proposed	Matter not agreed
GBC106	Site selection	2.1.145	Process whereby sites were selected	Understand the logic more clearly. The sites suggested are greater north of the river, whereas the main impacts are to the south (including along the M2). It is not clear how Hole Farm addresses these	Matter not agreed

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				issues in the wider context	
GBC107	Nitrogen deposition methodology	2.1.146	Clarity of the link between impacted sites and compensation sites.	Understand the logic more clearly. See GBC106 above, however concerns remain over the site selected and how they relate to overall scheme in landscape and biodiversity terms.	Matter agreed
Geology and soils					
GBC120	General comments on geology and soils	2.1.158	Highlighting various matters that past experience of the local geology has raised, particularly in the Shorne/Cobham area.	Detail comments from applicant on approach to be taken	Matter agreed

15 December 2023