



Meeting note

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| File reference | Lower Thames Crossing – TR010032 |
| Status | Final |
| Author | The Planning Inspectorate |
| Date | 26 November 2020 |
| Meeting with | Highways England |
| Venue | Teams meeting |
| Meeting objectives | Post withdrawal of Application |
| Circulation | All attendees |

Summary of key points discussed:

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the PA2008). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

The Applicant provided an update on their engagement with stakeholders since their formal withdrawal of the application. It also confirmed that they had undertaken external engagement by way of social media and their website.

The discussion noted the process and activities that had occurred during the period from application submission to when the application was withdrawn on 20 November. The meeting note can be found here:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-Advice-00026-1-201113%20Lower%20Thames%20Crossing%20-%20Acceptance%20meetings%20FINAL.pdf>

- The application was received by the Inspectorate on 23 October 2020. On 9 November 2020, under Regulation 5(5) of The Infrastructure Planning (Applications: Prescribed Form and Procedures) Regulations 2009 the Inspectorate requested for the Applicant to provide all responses to the consultation carried out under Part 5 of the PA2008. The Inspectorate also requested for the Applicant to provide unredacted information from the Consultation Report submitted with the application in order to enable the information in the Consultation Report to be matched with the responses received under Regulation 5(5). The Applicant provided the consultation responses and the unredacted information on 11 November 2020.

- On 13 November 2020, the Inspectorate contacted Highways England to establish that the Inspectorate would be progressing to issue a decision to not accept the application and identified the main issues that had arisen from the consideration of the application. Highways England were provided with an opportunity to signpost where in the submitted application documents information relevant to the main issues were set out. Highways England provided a document that contained signposting on 17 November 2020. The Inspectorate continued to progress to issue a decision to not accept the application informing Highways England of this on 18 November 2020.
- The Inspectorate's advice during the acceptance period, that was summarised on 13 November and forwarded in full to the Applicant on Friday 20 November, is attached at Annex A.
- The document submitted by the Applicant on 17 November 2020 is appended at Annex B.

The discussion noted the content of Annex A; drawing on the themes that it contained rather than a detailed discussion of each paragraph or point noted.

The Applicant set out their initial plans for resubmission of the application.

The Applicant and the Inspectorate agreed to a regular programme of pre-application meetings that would seek to discuss the matters noted in Annex A in more detail. A note of pre-application meetings would be taken and published on the National Infrastructure website in accordance with section 51 of the Planning Act 2008 (the PA2008).

Observations from the consideration of Highways England's application for Lower Thames Crossing

Environmental effects arising from changes to levels of traffic and mitigation

Highways

- 1 The construction phase assessment provided in the Transport Assessment focuses on the M25, A2, A226 and A1089 and little information is provided on the implications of any changes in traffic flows on other local roads. Highway diversions, realignments and closures are listed in the DCO for several local roads during the construction period, but the effects arising from those during the various phases of the construction period are not quantified or considered in detail.
- 2 Construction traffic management proposals and other mitigation measures in the Transport Assessment, ES Appendix 2.1, Code of Construction Practice and Register of Environmental Actions and Commitments (REAC) relevant to construction traffic are largely generic and lacking in detail. The extent to which advice from local authorities, residents and businesses on construction traffic and related matters has been obtained or incorporated is not clear. It is not apparent whether the mitigation measures would, or could, be consistent with the traffic modelling, with the transport assessment or with the assessments of likely environmental effects in the Environmental Statement (ES).
- 3 The adequacy of the assessments of likely environmental effects arising from changes in traffic level during the construction period does not appear to have been demonstrated.
- 4 Effects during the construction period have the potential to be both wide ranging and significant, particularly in the vicinity of local roads. Such effects are often of relevance and concern to the local authorities, residents and businesses and can be substantive matters for Examinations.
- 5 Application documents should provide enough information of the likely significant effects on the environment, or that appropriate mitigation is likely to have been identified.

Navigation

- 6 The ES identifies that certain materials for the construction of the tunnels could be delivered by river transport via an existing jetty at Goshem's Farm. ES Chapter 2 paragraph 2.5.26 states that in the worst case scenario, the jetty would be refurbished and used for the transport of materials. The ES has not consistently stated how this jetty would be used and there are discrepancies within the ES as to the number of barges per day which would deliver this material, as well as some discrepancy in respect of the current usage of the jetty, which only has planning permission up until 2022. For examples of discrepancies, see para 11 and 12 below.

- 7 The application is not clear as to whether there would be an increase in barge / other river vessel movements as a result of the construction of the Proposed Development and the extent to which this might impact on the navigation of the River Thames.
- 8 Within the Scoping Opinion, the Secretary of State, Marine Management Organisation and the Port of London Authority (PLA) requested that if the River Thames is to be used to transport material, a navigation assessment should be included within the ES in order to determine the effects of these movements (in terms of both commercial and recreational craft). Statutory consultation responses from Port of Tilbury and the PLA reflect their concern at the lack of a navigation assessment.
- 9 No navigation assessment has been undertaken. Appendix 4.1 states that a navigation assessment is not required as "it is assumed that barge movements would be limited to two a day", but this contradicts other information as set out above. ES Chapter 13 in respect of a navigational assessment is noted, however this lacks detail and relates to marine and riparian assets only.
- 10 Whilst no new jetty is to be constructed, as would have been the case at the time of the Scoping Opinion, the existing one would be refurbished, used and decommissioned and navigational impacts on the River Thames remain an issue which could be assessed and presented as part of the application.
- 11 For example, ES Chapter 13 paragraph 13.6.19 suggests that there would be two barges per day during the construction period; one per tide cycle. This is also identified in ES Chapter 9 paragraph 9.6.86 and in ES Appendix 4.1. However, ES Chapter 9 paragraph 9.6.192 suggests there would be up to six barge deliveries per day, and ES Appendix 2.1 paragraph 1.3.15 suggests there would be three barges per high tide and that high tide occurs twice a day. The HRA Stage 1 Screening Report (Document 6.5) also states up to six barges per day. In addition, the ES Air Quality Chapter Paragraph 5.6.7 states that a maximum of 1,800 movements (six barges per day) would occur and this quantity of movements is also stated in Appendix 2.1. In respect of the current use of the jetty, ES Chapter 13 paragraph 13.4.26 suggests three barges in any given 12-hour shift whereas paragraph 13.6.19 suggests three barge movements per day.
- 12 ES Chapter 9 paragraph 9.6.188 states that "*Marine construction would require plant, barges, workboats and safety boats to be brought to site with movement occurring within the Order Limits during the construction phase. Once the marine works are complete and the East Tilbury jetty is operational, there would be continued marine traffic from vessels transporting materials and equipment.*"

Site Waste Management Plan

- 13 There are elements of a generic site waste hierarchy within the documentation but limited information as to the actual implications of the waste handling implications on a 23km long site with twin bore tunnels under the Thames. Even where a high percentage of materials is to be retained for reuse (in accordance with the hierarchy) would still require extensive movements of large tonnage to / from excavation to stockpile / sorting / treatment locations before reuse over an

extended area and which may or may not need to cross the river between the respective tunnel portals.

- 14 The ES considers a 'road only' outlier position but this is not a substitute for an actual handling strategy which would need to consider multi-modal approach (see TfL considerations) and this all deferred for later consideration which means that mitigations have not been fully assessed. This interfaces with the Transport Assessment and Navigation elements identified above for the construction period particularly as it sets the 'significance' threshold as being at 1% of landfill capacity in the whole of England rather within the study area. There are a number of unfinished paragraphs and missing cross reference in the Materials and Waste section of the ES which make it difficult to read fully.

Habitats Regulations Assessment (HRA)

- 15 For the supporting information to provide sufficient information to allow the competent authority to undertake an appropriate assessment, first it must be established whether the Proposed Development could result in likely significant effects on any European sites **alone or in-combination** with other plans or proposals. Paragraph 4.2.24 of the HRA Stage 1 Screening states that no in-combination assessment was carried out where changes/effects are 'negatory'. The nature of what constitutes 'negatory effects' is not evidenced, defined or quantified and therefore it is not clear on the distinction between: an impact-effect pathway not existing or being possible to completely remove by application of avoidance measures¹; and, an impact-effect pathway resulting in an effect which is less than significant. The latter effects must be assessed alone and in-combination before screening out likely significant effects. It is not therefore clear if the in-combination assessment is sufficient.
- 16 The above point also has implications for the effects considered further in a shadow appropriate assessment and therefore it is not apparent that this is sufficient.
- 17 A number of the assessments provided lack supporting evidence, in particular the assessments of recreational pressure, disturbance from noise and light, groundwater changes, surface water changes, air quality effects from construction traffic emissions (this assessment is omitted entirely), effects of invasive non-native species (this assessment is omitted entirely), and air quality effects from vessel emissions. The points made above in relation to the Transport Assessment, assessment of navigation effects, and details of construction phase mitigation also have implications for the basis of the assessments in the HRA.
- 18 The Screening and integrity matrices are not of a satisfactory standard to allow examination. In particular, a number of very different effects are grouped together in the screening and integrity matrices, which results in the supporting footnotes lacking any detail on some of the effects within the grouping. The screening matrices have some errors in the footnotes referring to unrelated paragraphs in the main report. The integrity matrices do not show either an 'x' or

¹ Noting that measures *specifically intended* to avoid or reduce adverse effects on European sites cannot be taken into account in the assessment of likely significant effects.

✓ as per the key and while the footnotes aid interpretation this makes them less clear.

Adequacy of Consultation Responses

Guidance Considerations

- 19 DCLG Application Form Guidance (2008) and DCLG Guidance on the pre-application process are relevant. Unless stated otherwise, quotes and paragraphs refer to the latter Guidance.
- 20 DCLG Guidance states that consultation should be based on accurate information that gives consultees a clear view of what is proposed including any options (paragraph 20), that consultees will need sufficient information on a project to be able to recognise and understand the impacts (paragraph 68), that to ensure consultation is meaningful, the pre-application consultation process for major infrastructure projects encourages applicants to give consultees as much information as possible on the characteristics of the proposed project (para. 92) and that, for the pre-application consultation process, applicants are advised to include sufficient preliminary environmental information to enable consultees to develop an informed view of the project (para. 93).
- 21 DCLG Guidance also states that it is good practice that those who have contributed to the consultation are informed of the results of the consultation exercise; how the information received by applicants has been used to shape and influence the project; and how any outstanding issues will be addressed before an application is submitted (paragraph 81).
- 22 DCLG Guidance states that effective pre-application consultation will lead to applications which are better developed and better understood by the public, and in which the important issues have been articulated and considered as far as possible in advance of submission of the application to the Secretary of State. This in turn will allow for shorter and more efficient examinations (para. 15).
- 23 DCLG Guidance states that without adequate consultation, the subsequent application will not be accepted when it is submitted (para 19).
- 24 Paragraph 114 of the DCLG Guidance guides that the Secretary of State's judgement about whether an application is of a satisfactory standard to be examined will, amongst other things, be based on the extent to which the Applicant has had regard to that guidance, and the overall quality of the application in terms of the ability of the Examining Authority (ExA) to be able to examine it within the maximum 6-month statutory time period.
- 25 Paragraph 6 of the DCLG Application Form Guidance (2008) states that 'the application information must be provided to a sufficient degree of detail that will enable the Secretary of State (and all interested parties) to appropriately consider the proposal'.
- 26 The Project Description and EIA Methodology advise that the 'Rochdale Envelope' has been used. Paragraph 112 of the DCLG Guidance therefore is relevant. It

notes that care should be taken to ensure that the likely environmental effects, within the defined parameters, are assessed and, where possible, mitigated against.

- 27 Concern is noted, given the scale and extent of the proposals, about the likely amount of work required to address the shortfalls identified in the application and undertake the necessary consultations. Particular attention is drawn to elements of the Guidance in respect of the sufficiency of the information given and the desirability of providing feedback on the outcomes of consultations undertaken on the scheme as successively modified.

Sufficiency of Information

- 28 The adequacy of consultation representations (AoCR) received raised issues relating to the sufficiency of the information provided and the consequent ability of consultees to be able to develop an informed view of the project and to understand its impacts.
- 29 For example, a joint AoCR from Gravesham Council, Havering LB and Thurrock Council states that, "the Councils, in their role as technical authority, consider there was a lack of adequate information within Highways England's Statutory Consultation and were not able to form reasonable conclusions of the likely effects of the scheme".
- 30 The AoCR from Kent CC states that, "the County Council felt that in some areas, in particular within the Supplementary Consultation, there was a lack of information and detail which prevented respondents being able to make meaningful detailed comments, particularly with regard to the anticipated environmental impacts and traffic modelling".
- 31 The AoCR from Havering LB states that, "there are a number of documents that Highways England have not presented to Havering to review in draft format. Despite several requests the Council was informed that such documents would not be made available until the application was accepted for examination by PINS. Specifically, Highways England made available a number of chapters from the draft Environment Statement, however they did not provide the associated appendices which made it impossible to provide any meaningful comments on the draft documents ahead of the application being submitted to Planning Inspectorate'.
- 32 Comments from the Kent AoNB Unit attached to Gravesham Council's AoCR state that, "A major issue for us, in common with the other SEBs and as previously discussed, has been concerns over the adequacy of the information available on environmental matters to make informed responses to the formal consultations. Generally there has been very limited information available which has made it difficult to comment in detail. For example, there was no draft LVIA to comment on during formal consultations". Similarly, comments from Kent County Council Archaeology state that, "we had a range of concerns about the lack of detailed assessment, evaluation and impact assessment of certain classes of heritage assets".

- 33 Appendix 3 of Gravesham Council's AoCR contains a 'Selection of comments on the PEIR made in response to the Statutory Consultation Autumn 2018'.
- 34 The Appendix records that Natural England stated that, "Based upon the information provided, and the guidance above Natural England does not consider that the PEIR contains sufficient information for us to provide detailed advice on the nature, scale and significance of the impacts to designated sites, protected landscapes, protected species and wider biodiversity at present. Similarly, we do not feel there is sufficient information for us to be able to provide in depth advice on the appropriateness or otherwise of the indicative mitigation and compensation measures".
- 35 The Appendix records that the Environment Agency stated that, "Based on the information provided the PEIR does not provide all the information that we expected. If an application for development was made using it, we would object to the application due to insufficient information,".
- 36 As an example, the joint AoCR from Gravesham Council, Havering LB and Thurrock Council states that, "The Preliminary Environmental Information Report (PEIR) did not contain a standalone assessment of human health impacts".
- 37 Specific comments on the AoCRs relate to the consideration above of environmental effects arising from changes to levels of traffic and mitigation. For example, Havering LB states that, "Highways England were unable to provide LBH with a copy of the Transport Assessment, prior to the application being submitted and the joint AoCR from Gravesham, Havering and Thurrock states that the traffic modelling output available as part of the consultation materials did not contain the level of detail that would reasonably have been required for consultees to develop an informed view of the likely significant environmental effects of the Consultation Scheme on the local networks as well as on residents, businesses, open countryside and designated environmental areas".

Feedback on consultation

- 38 The AoCRs received raised issues relating to the adequacy of informing those who have contributed to the consultation of the results of the consultation exercise, how the information received by applicants has been used to shape and influence the project; and how any outstanding issues will be addressed before an application is submitted.
- 39 For example, the AoCR from Gravesham Council states that, "insufficient feedback has been provided to consultees over the last two years as to how their comments have influenced the development of the scheme".
- 40 Gravesham Council also states that, "The failure of Highways England to supply the [Consultation Report] in advance, as recommended on page 6 of PINS Advice Note 14, is noted as not assisting the assessment process".
- 41 The AoCR from Thurrock Council states that, "it would have been beneficial for the Council to have been able to review the original full copies of the consultation responses received from statutory bodies and for Highways England to specifically respond to the Council's consultation responses".

- 42 This concern is reflected in the joint AoCR from Gravesham Council, Havering LB and Thurrock Council.
- 43 The AoCR from Kent CC states that, "it would have been helpful if the applicant had provided a summary of the consultation findings to stakeholders and the public following each round of consultation. A 'Project Update' document was published in July 2019, following the Statutory Consultation, but this provided no indication of how the design had been influenced".
- 44 Val Hyland Consulting states in Appendix 3 of Gravesham Council's AoCR that, "Extensive and detailed comments were made at all stages, but the applicant provided no method of (easily or otherwise) identifying those points which had or had not been accepted/taken forward to the subsequent design stages. This was a key issue in terms of the scope and detail, and made subsequent consultation stages difficult to interpret".

Landscape and Ecology Management Plan

- 45 The application contains an Environmental Masterplan (EM) which forms an intrinsic part of the ES and is relevant to the assessment of Landscape and Visual effects and Biodiversity effects. The REAC (LV029) makes provision for a Landscape and Ecology Management Plan (LEMP) to be secured through Requirement 5 of the Development Consent Order (DCO) for the establishment of vegetation as shown on the EM (and ecological management through Requirement 4 of the DCO). Given the scale of the Project and associated landscape and ecological works (including new tree/woodland planting, translocation of ancient woodland soils, green bridges, hedgerows and new and enhanced areas of grassland) and the importance for these to function effectively over the long term, the absence of an outline LEMP as part of the application to demonstrate how this would be achieved is a concern.

Consultees identified on a precautionary basis

Southfleet Parish Council is located in Dartford. If Dartford is a host local authority, Southfleet Parish Council should be identified as a s42(1)(a) body being a relevant parish council under Schedule 1 of the APFP Regulations.

Further explanation would be helpful to justify if the following were consulted and in what capacity:

- Commissioner of Police of the Metropolis
- Southfleet Parish Council
- Onsett Hospital Minor Injuries Unit
- Port of Gravesend
- Harlaxton Gas Networks Limited*
- Murphy Gas Networks Limited*
- Eclipse Power Network Limited*
- Energy Assets Networks Limited*
- Fulcrum Electricity Assets Limited*

- Murphy Power Distribution Limited*
- Vattenfall Networks Limited*

It is noted that the licences held by some of these bodies (those marked with `*') cover Great Britain or various smaller areas and the operational areas of each are not clear from information in the public domain.

Southern Water and Thames and Medway Canal Association are s42(1)(d) as well as s42(1)(a) bodies.

Minor errors and omissions

Book of Reference (Doc 4.2)

Environment Agency postcode is BS1 not DS1.

Coopers Shaw Road is sometimes referred to as Cooper Shaw Road e.g. at entries 20-08, 20-13 and 20-45.

Should entry 25-04 state "north of Hornsby Lane" instead of "north of Gowers Lane"?

Land Plans (Doc 2.2)

We would suggest that the Applicant undertakes a full check of the Land Plans. Some examples of errors or points for clarification are noted below:

Sheet 1: Should 1-84 be north of M2 instead of A2 as per 1-102? 1-163 cannot be located on the plan.

Sheet 2: Unlabelled blue plot between insets b and c. Unlabelled pink plot between 02-19 and 02-30.

Sheet 4: 04-36 is not clear, this could benefit from an inset.

Sheet 10: Unlabelled green plot (running west to east) between 10-13 and 10-20.

Sheet 11: Unclear whether 11-05 extends all the way up the right-hand side of inset A or if the upper section is unlabelled.

Sheet 13: Unclear whether the green plot immediately south of 13-40 should have its own label or if it is connected to plot 13-34.

Sheet 15: Five unnumbered plots between insets A and B.

Sheet 20: Coopers Shaw Road spelled incorrectly as Coppers Shaw Road on plan.

Sheet 21: Unclear whether 21-26 extends all the way to the top of the plan or if the upper section is unlabelled. Suggest another inset for clarity.

Sheet 22: Labels 22-117 and 22-118 both point to the same plot on the plan, leaving one plot without a label.

Sheet 24: Unclear whether 24-183 extends all the way down to the southwest or if the lower section (next to 24-182) is unlabelled.

Sheet 29: Blue plot on inset B next to 29-45 under 29-48 has no number. Blue plot next to/under 29-35 has no number. Unclear if the tiny triangle at the bottom of the sheet (under the label for 29-34) is part of plot 29-37.

Sheet 30: Unclear if 30-269 extends up to 30-276 alongside 30-270.

Sheet 44: Unclear if the small triangle in inset C under 44-41, next to 44-51, is a continuation of 44-41 and needs dual labelling or an unlabelled plot.

Works Plans (Doc 2.6)

We would suggest that the Applicant undertakes a full check of the Works Plans. Some examples of errors or points for clarification are noted below:

Work 1A: (i) & (ii): No start/end points shown for these particular works within the scope of the overall 1A work. (iii) & (iv): no start/end point shown for this particular work within the scope of the overall 1A work. (v): no start/end point shown, as above. (vi): not clearly labelled with 1A on map. Appears to overlap with 1C.

Work 1C (i): Appears to be some overlap with 1A at the western end of the works.

Work 1D (i) and (ii): No reference in the draft DCO to specific reference points in the rights of way and access plans. Difficult to identify on the works plans as a result.

Work 1E: (i): Work extends from sheet 2 onto sheet 4, but no start/end point for this particular work within the scope of work 1E is indicated on sheet 4. (ii) & (iii): length of work is not noted in the draft DCO.

Work 2A (iii): Difficult to find this work on the plans, as no reference number is provided for the right of way plans.

Work 2B: (i): Work as shown on plans appear shorter than the 2,310m mentioned in the draft DCO, as work 2B(ii) appears longer on the plans but is also stated to be 2,310m. (iii): the 320m work appears longer on the plan.

Work 2E: Work stated to be on sheet 2 and 4, but not labelled on sheet 2.

Work 2O: No work length indicated in the draft DCO.

Work 2P: Draft DCO states that work 2P is on sheets 2 and 4, however the work shown on sheet 4 appears self-contained and there is no work labelled 2P on sheet 2.

Work 2Q: Seems to be an overlap with Work 3B on Sheet 9.

Work 3B: Some overlap with work 2Q.

Work 3C: Difficult to pinpoint work, as the same works centre line is labelled with several different works numbers (Works 3A, 3C, 4A).

Work 4B: No clear start/end points - possibly obscured by the "major structures" black box.

Work 5B: Some start/end points are unclear.

Work 5C: No clear start/end points - possibly obscured by the "major structures" black box.

Works 5G & 5K: They don't appear to be illustrated on the plan as being within a given limit of deviation.

Work 6D: Not labelled on sheet 29, as per draft DCO.

Work 7D: No start/end point on sheet 29 (far right extreme of the work).

Work 7J: No start/end point on sheet 29 (northwest extreme of the work).

Works 9A & 9B: No start/end point on sheet 36.

Work 'OH6': Listed in the draft DCO as being on work plan nos. 21, 24, 25, 26, 30, 35 and 39, however it is also displayed on work plan no. 32.

Work 'MU11': Listed in the draft DCO as being on work plan nos. 9 and 10 however it's also displayed on plan no. 20.

Environmental Statement (Docs 6.1 and 6.2)

ES Chapter 11: a number of formatting errors, including paras 11.3.25, 11.6.12, 11.6.13, 11.6.34, 11.6.35, 11.6.43, 11.6.44, 11.6.45, 11.6.46, 11.6.47, 11.6.48, 11.6.54, 11.6.55 and 11.5.58. In addition, many page numbers are incorrect.

ES Figure 7.21: page 3 of 10 has a slight distortion on the bottom right.

ES Figure 13.1: some labels seem to be written with odd spacing which makes searching difficult eg 'Sta rIndustria lEsta te, Cha dwell'.

ES Figure 13.2: some labels seem to be written with odd spacing which makes searching difficult eg 'English Coa sta lPa th'.

ES Figure 13.3: some labels seem to be written with odd spacing making it difficult to search eg 'Ha rtshillBunga lo w, 37Tho ng La ne'.

Loading errors

Some loading errors were encountered on the following documents:

- Crown Land Plans (Doc 2.3): sheet 19
- Rights of Way and Access Plans (Doc 2.7): key plan
- Environmental Statement Figure 7.21 (Doc 6.2): page 4
- Environmental Statement Figure 7.17 - Representative Viewpoints - (Daytime) Winter and Summer Views (5 of 7), (6 of 7) and (7 of 7) (Doc 6.2)
- Environmental Statement Figure 7.21 - Indirect Effects Assessment - Affected Roads during Operational Stage within the Kent Downs AONB (Doc 6.2)
- Environmental Statement Appendix 8.20 - Draft Water Vole Conservation Licence Application (Doc 6.3)

Searchable PDFs

In order to ensure ease of searching for plots, Applicants should consider providing PDF versions of documents which can then be searched by plot number, for example:

- Land Plans (Doc 2.2)
- Crown Land plans (Doc 2.3)
- Special Category Land Plans (Doc 2.4)

