

Gravesham Borough Council

Potential s.106 asks (DRAFT) – 10/02/2023

[Items in square brackets are probably to be dealt with by some other means but included at this stage for completeness]

Contents

Public Transport	2
Rail.....	2
Buses	2
River	3
Footpaths, Cycleways and other non-motorised user	4
Taxi's	5
Mobility as a Service (Maas) (INCOMPLETE)	6
Highways (primarily for KCC) Mitigation Measure	6
Transport modelling (INCOMPLETE)	6
Roads, junctions, bridges, signals (INCOMPLETE).....	7
Demand management measures and intelligent transport systems (INCOMPLETE)	8
Parking (see point about 'Staffing, liaison, monitoring and enforcement')	8
Staffing, liaison, monitoring and enforcement.....	9
Environmental Health	10
Noise	10
Air quality monitoring equipment	12
Light interference.....	13
Economy.....	13
Education, Employment and Skills (INCOMPLETE	13
Business disruption and support	15
Community impact.....	16
Health.....	16
Education	18
Replacement of service station facilities (INCOMPLETE)	19
Emergency services.....	20
Community Safety Resilience Measures (INCOMPLETE)	22
Leisure and recreational facilities (INCOMPLETE)	23
Accommodation and housing (HOUSING input needed)	24
Traveller sites (INCOMPLETE)	25
User charges - Resident discount (INCOMPLETE).....	26

Climate Change	26
Net zero carbon (INCOMPLETE).....	26
Environment.....	27
Cumulative environmental impacts including landscape and heritage (INCOMPLETE).....	27
Planting strategy (INCOMPLETE)	27

Public Transport

Rail

Stage	HoT /Draft Obligation
Construction	<p><i>Currently no assumption that contributions will be required for rail in s.106</i></p> <p>(However not clear from documents if there is sufficient capacity on routes terminating at National Rail stations in Gravesham i.e. North Kent Line (Northfleet, Gravesend, Higham) and Victoria Line (Meopham, Sole Street))</p>
Justification for National Highways <ul style="list-style-type: none"> • Framework Construction Travel Plan advises that shuttlebus will operate from existing transport hubs on both sides of the River Thames. • In Gravesend, the transport hubs cover Bus, HS1, National Rail 	
Stage	HoT /Draft Obligation
Operational	None
Justification for National Highways	

Buses

Stage	HoT /Draft Obligation
Construction	Contribution of £[]to bus operators & to facilitate the connections to the site and increase capacity on the network.
Justification for National Highways <ul style="list-style-type: none"> • The Outline Traffic Management Plan for Construction¹ (OTMPfC) recognises that closures and diversions may impact on journey-time reliability to and from facilities. The sensitivity of that will depend on the facility and the scale of the journey time impacts with schools and medical facilities being especially sensitive. 	

¹<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010032/TR010032-001503-7.14%20Outline%20Traffic%20Management%20Plan%20for%20Construction.pdf>

<ul style="list-style-type: none"> Brewers Road closure obvious specific example but also access to Thamesview School Framework Construction Travel Plan advises in paragraph 3.1.4 that shuttle buses will operate from existing transport hubs on both sides of the River Thames and that buses are likely to provide routes to each compound and inter-compound connectivity and will be for Project workforce only. It is assumed that the roadworks will require a number of temporary diversions which will impact on journey times and stop locations. Whilst it should be the responsibility of the relevant contractors to facilitate this work, it will impact on bus operators and users. 	
Stage	HoT /Draft Obligation
Operational	Contribution of £[]to bus operators / Clearchannel / parish council (?) to cover additional costs i.e. longer travel times or new bus shelters resulting from permanent change to bus routes due to LTC
Justification for National Highways	

River

Stage	HoT /Draft Obligation
Construction	Contribution of £[]to operators contribution to cover cost of extended hours of operation (i.e. evenings / Sunday) Need to enhance onshore facilities?
Justification for National Highways <ul style="list-style-type: none"> Framework Construction Travel Plan advises in paragraph 6.5.3 that the Gravesend hub is available to workers as a result of the ferry services and the services are listed in paragraphs 6.4.4. and 6.4.5. Page 105 in Construction Update (CIC v) for Northern Tunnel compound includes shuttlebuses for staff from local train stations and the Gravesend Ferry so ferry clearly part of assumptions Worker Accommodation Report assumes no worker flows via Dartford Crossing but no mention of ferry Ferry does not run on a Sunday and for it to facilitate non-car based travel, the hours of operation will need to be extended 	
Stage	HoT /Draft Obligation
Operational	None [see later point about cyclists]
Justification for National Highways	

Footpaths, Cycleways and other non-motorised user

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> Measures to increase cycling as an option for residents most affected by construction. Provision of new cycle shelters (including secure)
Justification for National Highways <ul style="list-style-type: none"> As set out in the Transport Decarbonisation Plan, Gear Change and Bus Back Better, public transport, cycling and walking must be the natural first choice for all who can take it. Construction phase is reducing sustainable travel options for people by causing issues with walking and cycling connectivity i.e. more convoluted national cycle route Cycle shelters - Provision at: <ul style="list-style-type: none"> Works compounds as cycling can be an inter-site transport operation for workers² Schools Shops Government recognises e-bikes can be “massively beneficial in enabling those with longer or hillier journeys to cycle and access employment opportunities in a way that’s not only more affordable but is easier, faster and good for our planet”³ Projects elsewhere in the Country include: <ul style="list-style-type: none"> Government has a pilot via Cycling UK to accelerate the uptake of e-cycles by offering short and long-term loans of e-cycles Wheels for Wellbeing (WfW) supporting disabled people of all ages and abilities to enjoy the benefits of cycling⁴ 	
Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> Fund for residents affected by permanent route changes Provision of new cycle shelters (including secure) Contribution of £[]to KCC / Ferry Operators? to facilitate cyclist access across the river Contribution of £[]to KCC for maintenance costs advising from additional PROW (NB. on sites NH retain they may pick up via their overall landscaping obligations)
Justification for National Highways <ul style="list-style-type: none"> The National Policy Statement for National Networks (NPSNN) in paragraph 3.17 states that there is a direct role for the national road network to play in helping pedestrians and cyclists, and the Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes. This includes ensuring that it is easy and safe for cyclists to use junctions. 	

² https://en.wikipedia.org/wiki/Cycling_in_the_Channel_Tunnel

³ <https://www.gov.uk/government/news/healthy-cost-effective-travel-for-millions-as-walking-and-cycling-projects-get-the-green-light>

⁴ <https://wheelsforwellbeing.org.uk/>

- LTC is reducing the attractiveness of sustainable travel options for people by causing issues with walking and cycling connectivity i.e. more convoluted national cycle route
- Dartford Crossing has a shuttle service for cyclists through the tunnel. KCC advise that this is not being offered for LTC but not sure what is being proposed? As the ferry is closer to the LTC portals than the Dartford Crossing, additional services for cyclists need to be funded

Taxi's

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Feasibility study for enhanced taxi services to support worker access and • Fund package of options to facilitate taxi's in Gravesham moving to electric vehicles. Could include: <ul style="list-style-type: none"> • Dedicated taxi charging infrastructure – proven technology and • Financial incentives to drivers to buy electric taxis including Offer grants or loans to encourage purchase of new and second-hand ZEV taxis, including wheelchair accessible vehicles. • Fund for swapping out the standard diesel engine for an electric motor and battery⁵
Justification for National Highways <ul style="list-style-type: none"> • Taxis play a key role in social mobility and transport mobility as they can help connect people to work, friends and family, especially in areas or at times of the day where there is limited public transport. They can also support individuals with specific needs, such as a disability, and may help some households to reduce their private vehicle ownership. • The Council considers that LTC should undertake a feasibility study for enhanced taxi services to assist workers getting to compounds without the need for the private car and vulnerable people whose mobility is being restricted by LTC's construction • At the same time, due to their relatively high mileage, mostly urban journeys and vehicle age, taxis also contribute significantly to poor local air quality, impacting the health of residents, pedestrians, and other drivers. Therefore LTC should fund a package of options to incentivise / facilitate taxis' in Gravesham moving to electric vehicles. 	
Stage	HoT /Draft Obligation
Operational	None ?
Justification for National Highways	

⁵ <https://www.solihull.gov.uk/news/solihull-taxi-drivers-find-out-how-they-can-turn-their-old-black-cab-zero-emission-electric>

Mobility as a Service (Maas) (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction	Contribution of £ to MaaS to mitigate accessibility impacts on the Borough as a result of LTC's construction
Justification for National Highways <ul style="list-style-type: none"> • 'Mobility as a service' (MaaS) encapsulates the move away from private vehicle ownership, towards travel need being provided as a single service with the added value of accessing mobility through a single application and a single payment channel (se https://www.designforebbsfleet-sustainabletravel.org/technology) • Kent CC intends to facilitate the introduction of additional modes of transport to be integrated into the MaaS App/back office platform, including electric car clubs and bike/e-bike hire companies with the inclusion of their booking and fare information, on the basis of the market potential across the Borough. 	
Stage	HoT /Draft Obligation
Operational	None
Justification for National Highways	

Highways (primarily for KCC) Mitigation Measure

Transport modelling (INCOMPLETE)

Stage	HoT /Draft Obligation
Pre-Construction	<ul style="list-style-type: none"> • Contribution to KCC for production and validation of non-SRN / local road model to enable 'real-time' model to be produced and tested before construction works take place • Commitment to ongoing monitoring of flows for inclusion in the model
Justification for National Highways <ul style="list-style-type: none"> • Further work on construction traffic modelling is still required to understand likely impacts • Lack of commitment to monitor and then mitigate, as necessary, effects on the wider network or junctions and local roads within Gravesham is a significant concern. 	
Stage	HoT /Draft Obligation
Construction and operational phases	<ul style="list-style-type: none"> • Contribution to KCC for maintenance and updating of local road 'real-time' model during construction phase
Justification for National Highways <ul style="list-style-type: none"> • Increased traffic, road closures and severance will put pressures on local business operations and on the local community's ability to access employment, education and public facilities, including GP surgeries and hospitals, especially via public transport. It 	

is essential that these impacts are minimised and this will require detailed, small scale and reactive modelling to ensure that flows are maintained so far as possible.

Roads, junctions, bridges, signals (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction	<p>??</p> <p>(Difficult to justify capital schemes for impacts due to construction but for known congestion hotspots that are identified as suffering from same or worse during construction, concern about ignoring opportunities for improvement)</p>
Justification for National Highways	
Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> Off-Site Junction Contributions totalling £XX (index-linked) are payable to KCC. The instalments in relation to the relevant junctions are set out in XX <ul style="list-style-type: none"> These payments can be put towards other highway improvements that KCC deem necessary to mitigate the effects of the Project, in the event the junction improvements are not necessary. Contribution of £[]to KCC for maintenance costs arising from additional Highway
Justification for National Highways	
<ul style="list-style-type: none"> LTC' s Wider Network Impacts Management and Monitoring Plan (WNIMMP) (CIC v)6, which is going to be a control document, explains in the covering note that: <ul style="list-style-type: none"> "The Wider Network Impacts Management and Monitoring Plan sets out a traffic impact monitoring scheme <u>to be carried out a year prior to opening</u> (to establish a baseline) and one and five years after the road opens. This is to identify delays and/or any worsening impact on the surrounding local, major and strategic road networks". WNIMMP includes in para 1.1.4 "Whilst the Project is expected to provide wide-reaching benefits to the road network, it is recognised that some of the junctions and links which experience increased traffic flows do not currently have sufficient capacity to cater for this additional traffic without adversely affecting the network speeds experienced by others on these roads". The Council understands, National Highways position that it intends to consider impacts on the local, major and strategic road networks once flows have stabilised but this means that local communities will be experiencing years of disruption i.e. the construction phase then 1-5 years of monitoring and then the development and construction of improvements and this is not acceptable. 	

⁶ [Wider Network Impacts Management and Monitoring Plan.pdf \(citizenspace.com\)](#)

(NB. GBC does not support approach for no other SRN works as part of LTC we consider Blue Bell Hill should be associated development)

- The funding approach for Local Road improvements need to take account of schemes where a cocktail of funding may be the appropriate approach
- KCC concerned about the amount of additional highway they will be acquiring and its future maintenance

Demand management measures and intelligent transport systems (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Travel plan to cover: <ul style="list-style-type: none"> • construction deliveries • spoil movement (along or crossing public highways) • workforce access • travel between sites • Regular monitoring of staff 'home' addresses to ensure travel plan effective with triggers for additional interventions as needed
Justification for National Highways <ul style="list-style-type: none"> • There are two major construction contracts (tunnels to Thong Lane and Kent roads south thereof) – these must be managed as a unit from local population point of view and avoid buck passing 	
Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> • Monitoring of actual traffic levels on appropriate (to be agreed) parts of the local highway network and development of interventions for junctions and links without capacity for increased flows
Justification for National Highways <ul style="list-style-type: none"> • WNIMMP includes in para 1.1.4 "Whilst the Project is expected to provide wide-reaching benefits to the road network, it is recognised that some of the junctions and links which experience increased traffic flows do not currently have sufficient capacity to cater for this additional traffic without adversely affecting the network speeds experienced by others on these roads". Whilst we have flagged that we consider that LTC should try to improve those affected junctions and links, real-time • Need an explicit commitment to further measures if predictions found to not have predicted actual impacts 	

Parking (see point about 'Staffing, liaison, monitoring and enforcement')

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Fund of £ [] for traffic regulation orders required to address the impacts of the scheme including but not limited to Controlled Parking Zones and permit schemes

Justification for National Highways	
<ul style="list-style-type: none"> • Council is concerned about impact on construction worker parking and needs to have mechanism in place if LTC's assumption about effectiveness of its construction travel plan • Success of LTC's proposal will need to be reviewed through monitor and manage reporting. 	
Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> • Impact of potential new car park on Thong Lane – need for on street parking enforcement if issue arise as with current Shorne Wood CP • Lorry parking challenges?
Justification for National Highways	

Staffing, liaison, monitoring and enforcement

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Contribution of £ to the Council to fund additional Council resources to fulfil the additional duties imposed on the Council by the Project including liaison, monitoring, management and enforcement including parking enforcement • (Excludes discharge of requirements?)
Justification for National Highways	
<ul style="list-style-type: none"> • The New Nuclear Local Authorities Group (NNLAG) commissioned a “Study on the impacts of the early stage construction of the Hinkley Point C (HPC) Nuclear Power Station” and whilst it is broadly positive, it does highlight the impact of some local issues on community wellbeing. It flags that such issues can escalate quickly, for example with regard to fly parking and advises that the speedy resolution of these is vital not only for the affected places, but also for the community confidence in the management of the project. • Requirement for extra resources in: • Parking enforcement • Community Liaison • Community Safety • Environmental Health • Housing (flagged separately) • Planning • etc 	
Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> • Contributions to support relevant authority engagement and monitoring, management and enforcement including parking enforcement

	<ul style="list-style-type: none"> ○ Will need a clear point of contact with National Highways on any issues that arise on A2/M2 or LTC (as per Hog Lane)
Justification for National Highways	

Environmental Health

Noise

Stage	HoT /Draft Obligation
Pre-Construction	<ul style="list-style-type: none"> • To agree on location of noise monitoring equipment following consultation with the LPAs • To install noise monitoring equipment and carry out noise monitoring in accordance with a programme approved by the LPAs • To report results of baseline noise monitoring to the LPAs
Justification for National Highways	
Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Independent assessment of the data from the Monitoring Stations to ensure that provisions of the Noise Mitigation Plan and the Development Consent Order are being complied with • To set out what remedial action will be taken if the results of the monitoring indicate noise is greater than that assessed for in the ES and already mitigated for.
Justification for National Highways <ul style="list-style-type: none"> • NNPS 5.83 For nationally significant infrastructure projects of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. Impacts should be kept to a minimum and should be at a level that is acceptable. • NNPS Section 158 of the Planning Act provides a defence of statutory authority in civil or criminal proceedings for nuisance. Such a defence is also available in respect of anything else authorised by an order granting development consent. The defence does not extinguish the local authority's duties under Part III of the Environmental Protection Act 1990 ("the 1990 Act") to inspect its area and take reasonable steps to investigate complaints of statutory nuisance and to serve an abatement notice where satisfied of its existence, likely occurrence or recurrence. • 4.58 It is very important that during the examination of a nationally significant infrastructure project, possible sources of nuisance under section 79(1) of the 1990 Act, and how they may be mitigated or limited are considered by the Examining Authority so they can recommend appropriate requirements to the Secretary of State • The likely noise and vibration impact from the construction of the Proposed Scheme will be assessed and the findings reported in the Environmental Statement. 	

- The draft Code of Construction Practice⁷ (CoCP) (CIC v) will set out the control measures that will be applied by LTC's contractors to minimise adverse impacts and effects via on-site mitigation to avoid the need for off-site mitigation.
- However if on-site mitigation has been exhausted and this has been confirmed by local authority consent but significant adverse noise effects remain, then off-site mitigation and compensation measures will be developed and offered to landowners and occupiers.
- Packages should include provision of noise insulation and temporary re-housing package including for more vulnerable such as mobile homes. As a model the HS2 policy includes:
 - Temporary alternative accommodation.
 - Removals
 - Storage and insurance of personal effects.
 - Insurance for the vacated house
 - Where appropriate, for pets to go into kennels, catteries etc.
 - Where appropriate, for the disconnection and later reconnection of gas, water, electricity etc
- LTC is producing a Health and Equalities Impact Assessment (HEIQ). Research has shown that case by case consideration will be needed to impacts can depend on the vulnerability of any affected persons residing in or using a property i.e particular attention would need to be given to those who are housebound or suffering from a medical condition that could be exacerbated by increased noise or shift working)

Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> • Fund the independent assessment of the data from the Monitoring Stations to ensure that provisions of the Noise Mitigation Plan and the Development Consent Order are being complied with • To provide a report of the data from the Noise Monitoring Stations to the Borough Council every 12 months unless otherwise agreed in writing with the Council

Justification for National Highways

The NPSNN sets out in paragraph 4.50 that in deciding an application, the Examining Authority and the Secretary of State should focus on whether the development itself is an acceptable use of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. They need to work on the assumption that in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced.

⁷ https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Code%20of%20Construction%20Practice%20Including%20the%20REAC.pdf

Air quality monitoring equipment

Stage	HoT /Draft Obligation
Pre-Construction	<ul style="list-style-type: none"> • To agree on location of air quality monitoring equipment following consultation with the LPAs (<i>the Council isn't sure where LTC are with this</i>) and fund the equipment that GBC has already been in place in anticipation • To install monitoring equipment and carry out monitoring in accordance with a programme approved by the LPAs • To report results of baseline air quality monitoring to the LPAs
Justification for National Highways <ul style="list-style-type: none"> • Officers have been pleased that concerns about monitoring and exceedances have been taken into account in the project and 'Plan B' elements are included in the Code of Construction Practice and Register of Environmental actions and commitments i.e. actions in case of air quality and noise monitoring exceedances 	
Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Independent assessment of the data from the Monitoring Stations to ensure that provisions of the Air Quality Mitigation Plan and the Development Consent Order are being complied with • To set out what remedial action will be taken if the results of the monitoring indicate air quality is worse than that assessed for in the ES and already mitigated for.
Justification for National Highways <ul style="list-style-type: none"> • Section 5 of the NNPS sets out generic impacts including air quality. This explains that the ES for the DCO should describe: <ul style="list-style-type: none"> • existing air quality levels. • forecasts of air quality at the time of opening, assuming that the scheme is not built (the future baseline) and taking account of the impact of the scheme; and • any significant air quality effects, their mitigation and any residual effects, distinguishing between the construction and operation stages and taking account of the impact of road traffic generated by the project. • The Construction Update (CIC v) recognises that the construction of the Lower Thames Crossing has the potential to affect air quality through the release of dust and exhaust emissions from construction activities and traffic during the construction phase. • The likely air quality impact from the construction of the Proposed Scheme will be assessed and the findings reported in the Environmental Statement. 	

<ul style="list-style-type: none"> The draft Code of Construction Practice⁸ (CoCP) (CIC v) will set out the control measures that will be applied by LTC's contractors to minimise adverse impacts and effects via on-site mitigation to avoid the need for off-site mitigation. However if on-site mitigation has been exhausted and this has been confirmed by local authority consent but significant air quality effects remain, then off-site mitigation and compensation measures will be developed and offered to landowners and occupiers. 	
Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> Payment to GBC to assess whether there is need to alter the AQMA (A2 existing and/or new on LTC) as a result of the completed scheme
Justification for National Highways	

Light interference

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> Process and fund for light interference issues to include: <ul style="list-style-type: none"> Reduced access to light requiring additional equipment with capital and revenue costs (energy) disturbance from light pollution requiring additional equipment costs such as installation of blackout blinds / new boundary treatments etc
Justification for National Highways	
<ul style="list-style-type: none"> 	
Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> Process and fund for light interference issues to include: <ul style="list-style-type: none"> Reduced access to light requiring additional equipment with capital and revenue costs (energy) disturbance from light pollution requiring additional equipment costs such as installation of blackout blinds / new boundary treatments etc
Justification for National Highways	

Economy

Education, Employment and Skills (INCOMPLETE)

⁸ https://highwaysengland.citizenspace.com/ltc/community-impacts-consultation-2021/supporting_documents/Code%20of%20Construction%20Practice%20Including%20the%20REAC.pdf

Stage	HoT /Draft Obligation
Construction	<p>LTC will implement the Skills, Education and Employment Strategy which states that it will secure sustainable benefits to local communities by providing new work, jobs and educational opportunities.</p> <p>The Strategy will also develop the skills of the project’s workforce and assist individuals of all ages and backgrounds within local communities, to enter or re-enter the labour market. This activity will make use of clear pathways to secure work and employment on the Project - especially for those most impacted by the Project and / or vulnerable to economic inactivity.</p> <p>To enable delivery of the interventions listed in the SEE Strategy, proof will be provided that a fund worth £XXX,XXX has been committed to an identified Project budget, such that expenditure can be made immediately at the point where the DCO is granted.</p> <p>Other specific commitments to include:</p> <ul style="list-style-type: none"> • A flagship Construction Skills Hub (incorporating Project Innovation, Decarbonisation & Supply Chain themes) to complement existing training provision and the LTC’s Carbon Academy. The hub is intended to be a physical facility that responds to the identified needs of the Project, as well as the local supply chain and workforce. <p>A minimum financial of £2,000,000 (with the capital versus revenue split to be determined post feasibility for the Hub) towards the cost of upskilling the local population, to meet the need arising from the Project and additionally, prevailing industry skills shortages.</p> <p>The above financial contribution has been calculated by taking into account the work and employment generation impact, primarily (though not exclusively) on the south side of the Thames and within the 20-mile target radius of the project boundary.</p> <ul style="list-style-type: none"> • Skills Hub Project Management. A revenue funding pot of £150,000 to be used flexibly to procure dedicated project management and development support, to assist delivery of the afore-mentioned Construction Skills Hub. • An initial £50,000 to be made available following submission of the DCO application, to enable early feasibility work to be progressed with partners and the SEE Skills Working Group.

Justification for National Highways	
<ul style="list-style-type: none"> LTC's Skill strategy includes - Ensure we have the skills to deliver the Lower Thames Crossing and leave a skills legacy for the Highways and construction sector The above ask has been framed to make a distinction between what will be funded by the supply chain (through contracted "Employment and Skills Plans") and what will be funded directly by the LTC / National Highways, especially earlier stage skills training to prepare local people for roles. 	
Stage	HoT /Draft Obligation
Operational	None
Justification for National Highways	

Business disruption and support

Stage	HoT /Draft Obligation
Construction	<p>With the Covid business support packages as a good model, develop a methodology to assess how businesses and 'not for profit' and third sector organisations are being impacted and define and fund support as appropriate.</p> <p>Could include:</p> <ul style="list-style-type: none"> Temporary reduction in rateable value to a business affected by works. Or a comparable small grant. Help with Business Interruption Insurance (this may not be available to affected businesses as the LTC is known and / or costs would be prohibitive) An administrative resource of £20,000 of revenue funding, to support the design, implementation and ongoing management of a business disruption fund <p>Recognise that businesses will need to provide evidence to substantiate any claims on the impact the works have had on their business and support to produce this evidence should be included in the offer package.</p> <p>Discounted permit for local businesses during construction phase</p> <p>A fund will be established to support discounted permits for local business travel during the construction phase.</p>
Justification for National Highways	

- Fear on the unknown will influence business investment decisions to the detriment of the local area
- Need support packages for businesses who will be affected by construction disturbance and diversion.
- We understand that water companies are required by law to compensate for loss of business while gas companies have a statutory obligation to provide compensation to some small businesses for long-term roadworks, it does seem perverse that National Highways does not have such a responsibility
- We recognise that such a mechanism would need:
 - a clear framework on this, i.e. how to define disruption and what do businesses need to evidence.
 - Need clarity about geographical and temporal scope
 - Not all businesses need to pay rates and so a funding support package approach would be more applicable.
 - Also need resources to fund the administration of the fund.
-

Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> • None
Justification for National Highways	

Community impact

Health

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Residual healthcare planning contribution to local health care services to mitigate the effects of the additional population from non-resident workers and their dependants on the local NHS Services capacity for demands not covered by LTC on-site facilities for the time that such public funding takes to adjust so as not to reduce service availability for existing residents • Fund for increased health demands from local population due to construction impacts (facilities such as Cascades could help with social prescribing offer)
Justification for National Highways	
<ul style="list-style-type: none"> • The health and equalities impact assessment (HEqIA) considers a range of health determinants including air quality, noise and vibration, light pollution, mental health and well-being, as well as determinants related to accessibility to green space, services and travel. The assessment then considers the sensitivity of a community to change. The assessment recognises that the cumulative health outcomes for communities in close proximity to construction activities, compounds and construction traffic routes will be negative and significant on quality of life and 	

<p>wellbeing including stress, anxiety, mental wellbeing, sleep disturbance and uncertainty.</p> <ul style="list-style-type: none"> • Whilst these are temporary, as the construction phase will last around 6 years, those communities in closest proximity to certain aspects will be impacted in a medium to long-term nature. • At a CIPHAG, mention of LTC providing full range of healthcare provision for its workers but no detail • Worker Accommodation Strategy is an important input to this and other capacity related issues 	
<p>Internal Comment</p> <p>Approach for other projects:</p> <ul style="list-style-type: none"> • HS2 (or the statutory undertaker) and its contractors will be responsible for managing the occupational health of temporary workers employed on the construction site, including health assessment, health monitoring, preventative treatment where necessary, and first aid. The mechanism for delivering this is being formulated and may include providing access to occupational health nurses and doctors in appropriate locations close to the site. Where treatment (post-first aid) or rehabilitation is required, workers may be transferred to the NHS; typically to A&E services or referred to consultants. It is not anticipated that temporary workers will place significant demands on local GP services or other local health care services. • The New Nuclear Local Authorities Group (NNLAG) commissioned a “Study on the impacts of the early stage construction of the Hinkley Point C (HPC) Nuclear Power Station”⁹ and this considers that for health, the early provision of the on-site Medical Campus has provided a high level of medical treatment and advice for the workforce, taking the pressure off the local NHS services • Sizewell providing an on-site (main development site), 24/7 comprehensive occupational health service, to workers on the construction of the Sizewell C Project, including on-site first-response, pharmacy, nursing, and GP services which would include health, drug and alcohol screening, sexual and mental health, treatment and physiotherapy. The occupational health service will proactively manage the health of workers as well as treating and advising workers who have accidents or are taken ill at work. 	
Stage	HoT /Draft Obligation
Operational	Contribution of £ to local health care services to add capacity for accidents and incidents from new roads and junctions
<p>Justification for National Highways</p> <ul style="list-style-type: none"> • The Lower Thames Crossing is predicated on adding road capacity which will result in more vehicles using the road than current (no road so will be more vehicles). • Even if road is more safe than current – GBC has concerns that complexity of road junctions means that safety is a factor that need further investigation – there will be accidents and incidents that aren’t currently occurring with pressures on acute care (but also Air Ambulance, KFRS, SECAMB etc) 	

⁹ <https://beta.southglos.gov.uk/wp-content/uploads/IAU-Monitoring-and-auditing-study-final-report-Hinkley-Point-C-nuclear-power-station-Dec-2019.pdf>

Education

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Contribution of £[]to Kent County Council for additional School and Early Years Capacity Measures. The contribution will cover: <ul style="list-style-type: none"> • The demand for additional school place/early years provision for children of the non-resident construction workforce including workers who have moved to Kent for the LTC project • Information gathering such as: <ul style="list-style-type: none"> ○ Survey of schools by KCC ○ An obligation to conduct regular workforce surveys to monitor demand for school spaces from LTC worker's children • Staff retention and recruitment for schools affected by construction • Set up a fund to facilitate school drop off and pick up due to longer journey times due to construction especially for parents whose children attend multiple / dispersed schools – could include: <ul style="list-style-type: none"> ○ additional breakfast and after-school spaces ○ staff to cover longer opening times to facilitate earlier drop offs and later pick ups ○ Taxis ○ Bus passes • Learning disturbance fund to provide equipment, counselling and support to children whose learning experience has been affected by the construction project due to their proximity to the construction works and / or their vulnerabilities • Fund for capital works for educational establishments to mitigate unacceptable noise, air quality, light etc impacts on sensitive receptors
Justification for National Highways <ul style="list-style-type: none"> • Understand from KCC education that no contributions are currently proposed (we have been advised that whilst impacts on schools have not been discussed with KCC education, discussions have been on-going with individual schools) Standard practice from other construction projects that the demand for additional school place/early years provision for children of the non-resident construction workforce is funded, unless National Highways has expectation that children from non-resident construction workforce are met by private provision • Concern over construction disturbance with increased journey times. This will potentially make affected schools less attractive to staff and also cause problems for parents picking up / dropping off children. Extending the opening hours of schools so that children can be dropped off earlier and picked up later could assist but in some cases children may need alternatives ways to get to school i.e. bus pass, cycle, taxi 	

<ul style="list-style-type: none"> LTC has considered non-residential buildings occupied by noise or vibration-sensitive receptors such as educational establishments in its noise modelling, however if the environment is unacceptable, LTC need to fund additional measures on a case-by-case basis. This is equally true for air quality, light etc Sizewell agreed to make available a public services contingency fund to Suffolk CC to mitigate any unexpected effects on statutory services, including school places and social care. Staff retention is a concern for emergency services, social care, health and local authorities etc 	
Stage	HoT /Draft Obligation
Operational	None
Justification for National Highways	
Internal Comment	

Replacement of service station facilities (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction and operational	?? The services at Cobham are well-used resource and its loss is not addressed
Justification for National Highways	
<ul style="list-style-type: none"> DfT guidance recognise that roadside facilities perform an important safety function by providing opportunities for the travelling public to stop and take a break during their journey. Government advice is that motorists should stop and take a break of at least 15 minutes every two hours. The network of signed roadside facilities on the SRN is intended to provide opportunities to stop at intervals of approximately half an hour. However, the timing is not prescriptive as travel between services may take longer on congested parts of the SRN. The guidance is broadly that existing facilities on or near to the SRN must be retained for their continued and future use unless it can be clearly demonstrated that a need no longer exists. National Highways have not produced this evidence and the services at Cobham are well-used resource Council concerned over loss of service station without provision – safety concern from tired drivers and need for electric vehicle charging. 	

Emergency services

Stage	HoT /Draft Obligation
Construction	<p>Payment of £XX from the Emergency Services Contribution to Kent County Council for onward payment to the KFRS, Kent Police, RNLI, Air Ambulance and SECAMB</p> <p>Annual payment of £XX from the Emergency Services Contribution to Gravesham BC in respect to local emergency planning response including rest centres etc</p> <p>Provision also needs to made for (additional) contingency payments in circumstances where additional resources become necessary due to protests, demonstrations, evacuations or public safety initiatives.</p>
<p>Justification for National Highways</p> <ul style="list-style-type: none"> • The NNPs in paragraph 4.37 sets out how the NPS puts Government policy on climate change adaptation into practice, and in particular how applicants and the Secretary of State should take the effects of climate change into account when developing and consenting infrastructure. The NNPS recognises that climate change is likely to mean that the UK will experience hotter, drier summers and warmer, wetter winters and therefore there is an increased risk of flooding, drought, heatwaves, intense rainfall events and other extreme events such as storms and wildfires, as well as rising sea levels. • NNPS under paragraph 5.99 includes “development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and priority is given to the use of sustainable drainage systems”. • The Emergency Services need to be resourced for these additional impacts in respect to this project. Contributions are sought to contribute to the additional resourcing requirements incurred by the specified emergency services as a result of the Project, particularly during the Construction phase. The following is a list of potential emergency scenarios for construction phase (in addition to most of those listed below): <ul style="list-style-type: none"> • Crane Collapse • Structural instability including of material piles • Breakdown of essential plant or loss of service supply (including loss of power supply, water supply or any mechanical / electrical breakdown causing a halt in production) • Loss of Access to working area • Unexploded ordinance (UXO) • Contributions are sought to contribute to the additional resourcing requirements incurred by the specified emergency services as a result of the Project, particularly during the Construction phase. The financial contributions will mitigate the potential 	

significant impacts of, or risks associated with the Project on the provision of services by such bodies which may otherwise arise.

- Payment to GBC for local response i.e. evacuation of the gridlocked road and the setting up of rest centres by the Local Authority.
- Payment needs to be made to cover whole resource demands inc. planning (Emergency Preparedness and Response Plan (EPP)), equipment provision, maintenance and replacement, additional personnel and training
- We consider that similar arrangements are needed as for the Silvertown Tunnel DCO i.e. this requires that 'no part of the authorised development may be commenced until the following plans and strategies, required by the code of construction practice, have been prepared for that part of the authorised development—

(b) Emergency Plan: to be prepared in consultation with the local emergency services and the relevant planning authority;

(c) Fire Plan: to be prepared in consultation with the London Fire and Emergency Planning Authority;

Stage	HoT /Draft Obligation
Operational	<ul style="list-style-type: none"> • Payment of £XX from the Emergency Services Contribution to Kent County Council for onward payment to the KFRS, Kent Police, RNLI, Air Ambulance and SECAMB • Payment of £XX from the Emergency Services Contribution to Gravesham BC in respect to local emergency planning response including Cascades role in providing shelter for those displaced from their vehicles in the event of a major incident • Development of a protocol setting out how Rendez-vous point is managed when not in use

Justification for National Highways

- The Strategic Road responders Agreement signed by National Highways explains that "Highways England will take a lead role in managing incidents affecting the network with emergency services taking a lead response where protection of life and property is the first imperative and where death, injury or criminality is involved or suspected"
- The Emergency Services need to be resourced for these additional impacts in respect to this project if National Highways view is incorrect, namely that its design and mitigation is sufficient to provide Climate Resilience. We have seen the Statement of Common Ground between (1) National Highways and (2) Emergency Services that includes the following statement, but Gravesham BC does not see how these additional requirements are funded, and so it appears that this will be at the expense of the local taxpayer either financially or in respect to the service it can expect :

'National Highways will not provide funding, from one public body to another, for an activity that the public body is already funded to provide as part of their statutory duties'.

- The following is a list of potential emergency scenarios for the operational phase:
 - Fire/Explosion

<ul style="list-style-type: none"> • Serious injury • Structural instability or tunnel face collapse • Breakdown of essential plant or loss of service supply • Breach of security • Escape of hazardous substances (Major gas leak, oil / fuel spillages etc.) • Ventilation failure e.g. in tunnel • Failure of safety critical mains electrical supply • Bomb / terrorist threats • Severe weather • Transport disruption • Flood / inundation • Fuel, oil etc spill • Payment needs to made to cover whole resource demands inc. planning (Emergency Preparedness and Response Plan (EPP)), equipment provision including vehicles, maintenance and replacement, additional personnel and training

Community Safety Resilience Measures (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Develop and implement measures set out in the Community Safety Management Plan (CSMP) including funding existing Community Safety Partnership for Gravesham • Establish a Community Safety Working Group which will have an ongoing role as a key stakeholder in relation to matters contained in the CSMP
Justification for National Highways <ul style="list-style-type: none"> • National Highways Strategic Business Plan¹⁰ includes the following: <ul style="list-style-type: none"> • “Our Strategic business plan sets out our approach to building on our work in the first road period between 2015-2020. ... It sets out our commitment to protecting the environment and communities, while getting our roads ready to support future businesses, jobs and homes • The New Nuclear Local Authorities Group (NNLAG) commissioned a “Study on the impacts of the early stage construction of the Hinkley Point C (HPC) Nuclear Power Station” and this considers that for community safety, there appears to be good management of potential project impacts through a combination of mitigation measures, including the implementation of the Worker’s Code of Conduct, and some resourcing has been provided towards community liaison and policing”. We understand that a lot of work was done upfront on community safety and resourcing was provided community liaison and policing, and that is not available for LTC. 	
Stage	HoT /Draft Obligation
Operational	None

¹⁰ <https://nationalhighways.co.uk/media/3i5c454q/strategic-business-plan-2020-25.pdf>

Justification for National Highways
--

Leisure and recreational facilities (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Contribution of £ for enhanced leisure and recreational facilities • Contribution of £ for replacement active leisure offer following loss of Southern Valley Golf Course (SVGC) • Contribution of £ for replacement facility at Cascades due to CPO
Justification for National Highways <ul style="list-style-type: none"> • Contribution to cover: <ul style="list-style-type: none"> • enhanced recreational pressure from construction workers • enhanced demand from residents whose normal leisure and recreational offer is unavailable due to construction impacts . The additional offer needs to be available from start of construction so Chalk Park is not applicable • enhanced demand from residents as their private leisure spaces may be less attractive due to construction impacts i.e. noise, dust etc • Loss of SVGC as an active leisure recreational resource. No proposal to replace the golf club. We do not agree that the provision of Chalk Park is a replacement. Significant time gap between loss of SVGC and gain for Chalk Park with no temporary provision in the intervening period. Also loss is active recreation and so replacement should be too, so need to consider further options. Cascades is the obvious location for such provision for active leisure due to its proximity. • Replacement of rear part of the Cascades site due to CPO <ul style="list-style-type: none"> ○ Highways England, via their Development Consent Order application, propose to compulsory purchase the rear part of the Cascades site as it is needed for the cutting approaching the tunnel portal and associated landscaping. This land is currently let to Swing Rite Ltd on a lease with 14 years remaining as a par 3 pitch and putt course. 	
Internal Comment <ul style="list-style-type: none"> • GBC has previously suggested that LTC support the council in ensuring that the new centre could deliver the level and nature of services required in the borough as well as ensuring the facility could be sufficient to continue to operate as a rest-centre in the event of an emergency situation 	
Stage	HoT /Draft Obligation
Operational	??
Justification for National Highways	

Accommodation and housing (HOUSING input needed)

Stage	HoT /Draft Obligation
Construction	<ul style="list-style-type: none"> • Fund: <ul style="list-style-type: none"> • Initiatives to increase the supply of bedspaces in private housing and tourist accommodation – for example, by enabling the delivery of units which otherwise would not be delivered, for example by assisting with cashflow on stalled sites. • We recognise that LTC does not want a housing legacy from the project and there are multiple ways that this can be avoided if they work in partnership with GBC i.e. LTC's contribution is primarily financial and GBC manages the delivery of the additional units for use by LTC workers for the construction phase but retains ownership. • Additional capacity in GBC's housing advice and homelessness prevention service and initiatives to facilitate access to PRS for local residents (such as schemes that allow people to move into private rented accommodation without having to pay a deposit) • The Council is developing a Social Housing Letting Agency to manage Private Rented Sector properties on behalf of Landlords to provide a long term, high standard, and affordable housing within the private rented sector. We are developing this it will help us break down barriers that may be experienced by some client's in accessing private rented properties and help reduce the waiting time for those waiting to be housed. LTC can provide assistance with this. • initiatives to reduce impact on existing communities such as development of Article 4 for HMOs • Coordinator(s) and Accommodation Working Group • An obligation to conduct regular workforce surveys which will be shared with working group in order to provide information to the Accommodation Working Group in relation to the estimated number of home-based and non-resident workers, their use of accommodation of different types and the location of their accommodation. This will also ask information about any family members which have re-located with them i.e. children. • (NB. Not clear what arrangements LTC would put in place if they had to temporarily move people due to construction impacts i.e. noise, air quality. Could be very short-term i.e. unexploded ordnance or long-term if air-filtration equipment or triple glazing was needed to be fitted to residential properties.)
Justification for National Highways	

- The Council still considers that National Highways should directly provide additional temporary accommodation in Gravesham as is happening in Thurrock.
- There is a wealth of research from the UK and wider that:
 - A lack of temporary accommodation for construction workers often forces those workers to rent any houses available on the private market, consequently reducing availability for residents.
 - Trade worker's ability to pay above-market rent to secure rental accommodation exacerbates inflation in the housing market.
 - The impact of tradespeople monopolising available accommodation has a negative impact on tourism
- There is a significant risk that if the workers take accommodation in the private sector this will lessen the opportunity to prevent homelessness or housing stress to the residents in Gravesham. They are at an unfair advantage that they will be a working status and be able to pay fees up front. This will impact on the service and therefore we are right to require that additional capacity is provided in GBC's housing advice and homelessness prevention service. In the event this isn't a post then we would need to consider additional funding for larger incentives.
- Sizewell has committed to make available a housing fund to mitigate potential adverse effects on the local housing market caused by workers using accommodation that would otherwise be used by local residents, by encouraging extra capacity to be brought forward, and making more efficient use of existing capacity. Part of the housing fund is provided as a reactive contingency which the Local Authorities could draw upon to mitigate any potential effects of the construction workforce on vulnerability to housing need and homelessness.
- East of Gravesend was a longstanding location for potential future growth for hundreds of homes. The LTC permanently removes this potential and so other areas are having to be looked at afresh.
 - The Wider Canal Basin site has been identified as a location for development, which with identified infrastructure enhancements (Bridge and Chalk relief road) could assist with some existing pressure points.

Stage	HoT /Draft Obligation
Operational	
Justification for National Highways	

Traveller sites (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction	Provision of new temporary site for existing caravans (Viewpoint)
Justification for National Highways	
Stage	HoT /Draft Obligation
Operational	

Justification for National Highways	

User charges - Resident discount (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction and operational	Gravesham residents should be eligible for a DartCharge discount ¹¹ as soon as the construction activity starts
Justification for National Highways Community Impacts Consultation ¹² (CIC v) documents advise: <ul style="list-style-type: none"> To align with NPSNN policy and to help the Project meet the Scheme Objectives, it is proposed that road user charges would be levied. 	

Climate Change

Net zero carbon (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction and Operational	<p>??</p> <p>Delivery of landform heat transfer infrastructure at Cascades as a wider, longer term benefit for areas impacted by the crossing and, specifically, as a sustainable means of operating the new leisure centre facility in the future.</p>
Justification for National Highways <ul style="list-style-type: none"> Section 10(3)(a) of the Planning Act requires the Secretary of State to have regard to the desirability of mitigating, and adapting to, climate change in designating a National Policy Statement (NPS) We have been advised that 75% of the carbon produced by the LTC project comes from user vehicles so this would appear to be an obvious area that needs to be mitigated 	
Internal Comment	

¹¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/702291/4._Dart_Charge_Residents_Discount_Application_Form.pdf

¹²

Environment

Cumulative environmental impacts including landscape and heritage (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction and Operational	Contribution of £[]to Gravesham Borough Council for a landscape and heritage compensation fund for LTC
<i>Justification for National Highways</i> <ul style="list-style-type: none"> • The Cobham Ashenbank Management Scheme (CAMS) was established in 1997 to undertake a programme of projects to conserve and enhance historic, nature conservation and landscape interests within Cobham Park and Ashenbank Wood area as a result of proposals in respect of the Channel Tunnel Rail Link and its impact on this area. • The Council considers such a fund is needed for LTC • In addition, we are concerned that the fund needs to recognise that projects funded by CAMS are being degrading by LTC and that is an additional factor that needs to be considered 	

Planting strategy (INCOMPLETE)

Stage	HoT /Draft Obligation
Construction and operational	Contribution of £[]to Gravesham Borough Council to fund the planting and maintenance of trees and vegetation along urban routes experiencing increased traffic and congestion
<i>Justification for National Highways</i> <ul style="list-style-type: none"> • Air pollution is a global issue, responsible for approximately one in every nine deaths each year. It is of particular concern in urban areas, where elevated pollutant concentrations and potential sufferers converge. • Trees and vegetation can play an important role in influencing urban air quality, and in mediating some of the negative effects of pollutants as the use of vegetation to mitigate particulate pollution has been recognised for a number of years. • Whilst the Council has concerns about the accuracy of the transport modelling supporting the project, we know – from existing congestion on the A2 - that congestion and disturbance will result in rat running through the urban area • Research has indicated that the plants selection has to be carefully tailored to the area and as the Council is concerns about PM2.5 – which have no safe limits – the leaf form can be particular important i.e. presence of trichomes and ridges or grooves 	