

Lower Thames Crossing

6.3 Environmental Statement
Appendices
Appendix 7.14 – Landscape
and Visual Legislation and
Policy

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Lower Thames Crossing

6.3 Environmental Statement Appendices Appendix 7.14 – Landscape and Visual Legislation and Policy

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1 Landscape and visual legislation and policy

1.1 Legislation and policy

1.1.1 The landscape and visual assessment has been undertaken in accordance with relevant legislation, together with national, regional and local plans and policies.

Legislation

- 1.1.2 Relevant legislation that has been considered in the environmental assessment is presented in Table 1.1. The Planning Statement (Application Document 7.2) provides an assessment of the Project's strategic alignment and conformity with the National Policy Statement for National Networks.
- 1.1.3 A number of the sources of legislation referred to throughout the ES, including this appendix, derive from the law of the European Union (EU). It is noted that the impact of European legislation may need to be revised following the UK's exit from the EU but much EU-derived domestic legislation continues to have effect in domestic law. Relevant legislation is included in Table 1.1.

Table 1.1 Legislative requirements

Scale	Description of legislation	
European	European Landscape Convention (ELC) (2000, Convention of the Council of Europe)	
The Landscape Institute website (Landscape Institute, n.d.) provides the information about the ELC:		
	'The ELC is the first international treaty dedicated to the protection, management and planning of all landscapes in Europe. Signed by the UK government in 2006 and introduced in March 2007, the ELC provides a people-centred and forward-looking way to reconcile management of the environment with the social and economic challenges of the future and aims to help people reconnect with placeThe ELC contains 18 articles which, collectively, promote landscape protection, management and planning, and organising European cooperation on landscape issues.'	
National	Environment Act 2021	
	The Environment Act has two main functions:	
	1. To give a legal framework for environmental governance in the UK.	
	2. To bring in measures for improvement of the environment in relation to waste, resource efficiency, air quality, water, nature and biodiversity, and conservation.	
	The majority of the Act does not make any immediate changes for organisations other than regulators.	
	The Environment Act does not currently present specific legislative requirements relevant to landscape and visual. Further requirements may be implemented through secondary legislation to be made under this Act in the future, and the Project will respond as required.	
National	National Parks and Access to the Countryside Act 1949	
	Sets out the legislative framework for the designation and protection of the UK's nationally designated landscapes and includes the Kent Downs Area of Outstanding Natural Beauty (AONB). AONBs are designated solely for their landscape qualities,	

Scale	Description of legislation
	for the purpose of conserving and enhancing their natural beauty. They are designated under the Act to secure their permanent protection against development that would damage their special qualities.
	Wildlife and Countryside Act 1981
	Sets out the legislative framework for the designation and protection of nationally designated landscapes and includes the Kent Downs AONB.
	Countryside and Rights of Way Act 2000
	Section 82 confirms that the primary purpose of AONB designation is to conserve and enhance the natural beauty of the area. Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of AONBs when coming to decisions or carrying out their activities relating to or affecting land within these areas.
	Section 92 provides the following definition of natural beauty:
	'Any reference in this Part to the conservation of the natural beauty of an area includes a reference to the conservation of its flora, fauna and geological and physiographical features'.
	Natural Environment and Rural Communities Act 2006
	Indirectly affects both National Parks and AONBs in two ways. Firstly, it redefines 'natural beauty' to include wildlife and cultural heritage; natural beauty may consist of or include 'land used for agriculture or woodlands, land used as a park, or any other area whose flora, fauna or physiographical features are partly the product of human intervention in the landscape'. Secondly, it recognises the significance of opportunities National Parks and AONBs provide for the public to understand and enjoy an area's special qualities.

Policy

- 1.1.4 National policies are presented in Table 1.2, with the Project response to these requirements. Where there is duplication of requirements presented in the various relevant National Policy Statements, these have been combined and a single Project response to the policy issue is provided in the table.
- 1.1.5 Table 1.3 presents regional and local policies that have been considered during the development of the Project and the DCO application. Table 1.4 presents local policies and guidance documents relevant to the Kent Downs AONB.
- 1.1.6 Further detail on policy compliance can be found in the Planning Statement (Application Document 7.2).

Table 1.2 National policy framework and the Project response

Reference	Requirement	Project response		
National Policy Stateme	National Policy Statement for National Networks (Department for Transport, 2014)			
Paragraph 4.26 (Broadly consistent with Paragraph 4.4.2 of EN- 1, Paragraph 2.21.3 of EN-4 and Paragraph 2.11.8 of EN-5)	 'Applicants should comply with all legal requirements and any policy requirements set out in this NPS on the assessment of alternatives. In particular: The EIA¹ Directive requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of 	Chapter 7: Landscape and Visual (Application Document 6.1) assesses the likely significant effects of the Project with respect to the existing physical landscape (including seascape) and potential changes to its character and views experienced by visual receptors. Environmental Statement (ES) Chapter 3: Assessment of		
ŕ	the main reasons for the applicant's choice, taking into account the environmental effects.'	Reasonable Alternatives (Application Document 6.1), the Need for the Project (Application Document 7.1) and Chapter 4 of the Planning Statement (Application Document 7.2) set out the assessment of alternatives and the reasoning for the selection of the Project.		
Paragraph 5.32 (Broadly consistent with Paragraph 5.3.14 of EN-1)	'Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. ² Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.'	The development of the design for the Project has had regard to Design Manual for Roads and Bridges (DMRB) GG 103 Introduction and General Requirements for Sustainable Development and Design (Highways England, 2019) in terms of 'protecting, managing and enhancing the environment', as well as DMRB LD 117 Landscape Design (Highways England, 2020a) in terms of managing and minimising 'the impact of landscape disturbances and destruction from temporary works'. The Project design has avoided the loss of ancient woodland and veteran trees as far as reasonably practicable. In addition, there are essential mitigation measures proposed during construction in Table 7.18 of Chapter 7: Landscape and Visual (Application Document 6.1) to ensure the protection of retained trees.		

¹ EIA refers to Environmental Impact Assessment ² 'This does not prevent the loss of such trees where the decision-maker is satisfied that their loss is unavoidable.'

Reference	Requirement	Project response
		The loss of irreplaceable habitats has been considered as part of the planning balance between the need for and benefits of the Project and the adverse effects of the Project. This is discussed in Need for the Project (Application Document 7.1) and in Chapter 7 of the Planning Statement (Application Document 7.2).
		Compensation measures proposed for the loss of irreplaceable habitats are discussed in the Design Principles (Application Document 7.5), specifically in LSP.19 Ancient woodland compensation. Ancient woodland compensation planting is illustrated on Figure 2.4: Environmental Masterplan (Application Document 6.2).
Paragraph 5.144 (Broadly consistent with Paragraph 5.9.5 of EN- 1)	'Where the development is subject to EIA the applicant should undertake an assessment of any likely significant landscape and visual impacts in the environmental impact assessment and describe these in the environmental assessment.'	Chapter 7: Landscape and Visual (Application Document 6.1) assesses the likely significant effects of the Project with respect to the existing physical landscape and potential changes to its character and views experienced by visual receptors.
	'A number of guides have been produced to assist in addressing landscape issues. ³ The landscape and visual assessment should include reference to any landscape character assessment and associated studies, as a means of associated landscape impacts relevant to the proposed.	The methodology adopted for the landscape impact assessment presented in Section 7.3 of Chapter 7: Landscape and Visual (Application Document 6.1) takes account of the following documents:
	of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take	 DMRB LA 107 Landscape and Visual Effects (Highways England, 2020b)
	account of any relevant policies based on these assessments in local development documents in England.'	 Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (Landscape Institute and Institute of Environmental Management and Assessment, 2013)
		The landscape and visual impact assessment in Chapter 7 has been informed by the following published sources of

³ 'Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, April 2013. Natural England published profiles for National Character Areas.'

Reference	Requirement	Project response
		landscape character, management plan and associated polices/ principles:
		 Relevant Natural England profiles for National Character Areas (Natural England, 2014)
		 Relevant local development plan policies and/or local landscape character studies for Kent County Council, Maidstone Borough Council, Tonbridge and Malling Borough Council, Gravesham Borough Council, Medway Council, Essex County Council, Thurrock Council, London Borough of Havering, and Brentwood Borough Council. The Project response to local development plan policies is provided in Table 1.3 and Table 1.4
		 Kent Downs AONB Management Plan 2021-2026, (Kent Downs AONB Unit, 2021)
		The Land of the Fanns Landscape Character Assessment (The Land of the Fanns Landscape Partnership Scheme, 2016)
Paragraph 5.145 (Broadly consistent with Paragraph 5.9.6 of EN-1)	'The applicant's assessment should include any significant effects during construction of the project and/or the significant effects of the completed development and its operation on landscape components and landscape character (including historic landscape characterisation).'	The Project's effects on landscape character and landscape components are presented in Section 7.6 of Chapter 7: Landscape and Visual (Application Document 6.1) and Appendix 7.9: Schedule of Landscape Effects (Application Document 6.3). The presence of cultural heritage assets has been considered when determining the value of the landscape resource, as detailed in the description of baseline conditions in Section 7.4 of Chapter 7: Landscape and Visual. The impacts on historic landscapes are assessed in Chapter 6: Cultural Heritage (Application Document 6.1).
Paragraph 5.146	'The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential	The landscape and visual assessment has considered the effects of the Project on views and visual amenity in Section 7.6 of Chapter 7: Landscape and Visual

Reference	Requirement	Project response
(Broadly consistent with Paragraph 5.9.7 of EN-	impacts on views and visual amenity. This should include any noise and light pollution effects, including on local	(Application Document 6.1) and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3).
1)	amenity, tranquillity and nature conservation.'	The effect of lighting on the night-time environment and views is considered in Section 7.6 of Chapter 7: Landscape and Visual, and Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3). The effects on tranquillity, including the effects of noise, are considered as part of the assessment of effects on landscape character in Appendix 7.9: Schedule of Landscape Effects. The impacts on nature conservation are assessed in Chapter 8: Terrestrial Biodiversity (Application Document 6.1).
Paragraph 5.147 (Broadly consistent with Paragraph 2.2.5 of EN- 5)	'Any statutory undertaker commissioning or undertaking works in relation to, or so as to affect land in a National Park or Areas of Outstanding Natural Beauty, would need to comply with the respective duties in section 11A of the National Parks and Access to Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000.'	The Project would fall partially within the north-western extent of the Kent Downs AONB to the west of the River Medway, with a nitrogen deposition compensation site within the Kent Downs AONB south of Chatham. The potential effects on the landscape character and visual amenity of the Kent Downs AONB are considered in Chapter 7: Landscape and Visual (Application Document 6.1), Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3). Chapter 5 and Appendix F of the Planning Statement
		(Application Document 7.2) discuss the Project in relation to the respective duties in section 11A of the National Parks and Access to Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000. This includes a summary of the extensive design principles and mitigation measures proposed, and the need for the Project, which is also discussed in Need for the Project (Application Document 7.1).

Reference	Requirement	Project response
Paragraph 5.148	'For significant road widening or the building of new roads in National Parks and the Broads applicants also need to fulfil the requirements set out in Defra's English national parks and the broads: UK government vision and circular 2010 or successor documents. These requirements should also be complied with for significant road widening or the building of new roads in Areas of Outstanding Natural Beauty.'	The Project would fall partially within the north-western extent of the Kent Downs AONB to the west of the River Medway and includes a nitrogen deposition compensation site within the Kent Downs AONB south of Chatham and a nitrogen deposition compensation site at Burham. Chapter 5 and Appendix F of the Planning Statement (Application Document 7.2) discuss the Project in relation to 'English National Parks and the Broads: UK Government Vision and Circular 2010' (Department for Environment, Food and Rural Affairs (Defra), 2010). This includes a review of how the Project has responded to the purpose of the AONB. The potential effects on the landscape character and visual amenity of the Kent Downs AONB are considered in Chapter 7: Landscape and Visual (Application Document 6.1), Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3). Figure 2.4: Environmental Masterplan (Application Document 6.2) has been prepared to show the embedded environmental mitigation measures of the Project, including those along the A2/M2 corridor within the Kent Downs AONB.
Paragraph 5.149 (Broadly consistent with Paragraph 5.9.8 of EN-1)	'Landscape impact Landscape effects depend on the nature of the existing landscape likely to be affected and nature of the effect likely to occur. Both of these factors need to be considered in judging the impact of a project on landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the aim should be to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.'	Chapter 7: Landscape and Visual (Application Document 6.1) identifies the baseline conditions of the landscape in Section 7.4 and presents the assessment of impacts on the landscape in Section 7.6. This assessment takes into account the mitigation measures detailed in Section 7.5. The development of the design for the Project has had regard to DMRB GG 103 (Highways England, 2019) in terms of 'protecting, managing and enhancing the environment', as well as DMRB LD 117 (Highways England, 2020a) in terms of 'incorporating a sense of

Reference	Requirement	Project response
		place', managing and minimising 'the impact of landscape disturbances and destruction from temporary works' and 'enhancing its environment'. The design principles which consider these requirements are set out in the Design Principles (Application Document 7.5). Design principle LSP.01 discusses the retention of existing vegetation to reduce harm to the landscape, while design principles LSP.02, LSP.04, LSP.09, LSP.10, LSP.13, LSP.14 and LSP.20 discuss landscape mitigation measures.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) has been prepared to show the embedded environmental mitigation measures of the Project.
Paragraph 5.150 (Broadly consistent with Paragraph 5.9.9 of EN- 1)	'Development proposed within nationally designated areas Great weight should be given to conserving landscape and scenic beauty in nationally designated areas. National Parks, the Broads and Areas of Outstanding Natural Beauty have the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the Secretary of State has a statutory duty to have regard to in decisions.'	The Project would fall partially within the north-western extent of the Kent Downs AONB to the west of the River Medway, with a nitrogen deposition compensation site within the Kent Downs AONB south of Chatham. The potential effects on the landscape character and visual amenity of the Kent Downs AONB are set out in Chapter 7: Landscape and Visual (Application Document 6.1), Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3).
		Chapter 4 and Appendix F of the Planning Statement (Application Document 7.2) discuss the Project in relation to the Kent Downs AONB, including how the special status of the designated area has been taken into account in terms of route selection, the design of the Project and the extensive design principles and mitigation measures proposed. The need for the Project is also summarised in Chapter 3 of the Planning Statement, and is discussed in detail in Need for the Project (Application Document 7.1).

Reference	Requirement	Project response
Paragraphs 5.151 to 5.155 (Paragraph 5.151, broadly consistent with Paragraph 5.9.10 of EN-1; Paragraph 5.153, broadly consistent with Paragraph 5.9.11 of EN-1; Paragraphs 5.154 and 5.155, broadly consistent with Paragraphs 5.9.12 and 5.9.13 of EN-1)	 'The Secretary of State should refuse development consent within these areas except in exceptional circumstances and where it can be demonstrated it is in the public interest. Consideration of such applications should include an assessment of: the need for the development, including in terms of any national considerations, and the impact of consenting, or not consenting it, upon the local economy; the cost of, and scope for, developing elsewhere, outside the designated area, or meeting the need for it in some other way; and any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.' (paragraph 5.151) 'There is a strong presumption against any significant road widening or the building of new roads [in an] Area of Outstanding Natural Beauty, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Planning of the Strategic Road Network should encourage routes that avoid National Parks, the Broads and Areas of Outstanding Natural Beauty.' (paragraph 5.152) 'Where consent is given in these areas, the Secretary of State should be satisfied that the applicant has ensured that the project shall be carried out to high environmental standards and where possible includes measures to enhance other aspects of the environment.' (paragraph 5.153) 'The duty to have regard to the purposes of the nationally designated areas also applies when considering applications for projects outside the boundaries of these 	The Project would fall partially within the north-western extent of the Kent Downs AONB to the west of the River Medway, with a nitrogen deposition compensation site within the Kent Downs AONB south of Chatham. Chapter 5 and Appendix F of the Planning Statement (Application Document 7.2) discuss whether there are exceptional circumstances relating to the Project and the Kent Downs AONB. The need for the Project is also summarised in Chapter 3 of the Planning Statement and is discussed in detail in Need for the Project (Application Document 7.1). An assessment of the cost and scope of locating the Project outside the designated area is included in Chapter 4 of the Planning Statement (Application Document 7.2). In addition, ES Chapter 3: Assessment of Reasonable Alternatives (Application Document 6.1) and the Need for the Project (Application Document 7.1) set out the assessment of alternatives and the reasoning for the selection of the Project. Detrimental effects on the environment, the landscape and recreational opportunities within the Kent Downs AONB are identified in Chapter 5 and Appendix F of the Planning Statement (Application Document 7.2). There is also a discussion of the extensive design principles and mitigation measures proposed to help moderate these effects. An explanation of the compelling reasons that exist for the new/enhanced capacity is summarised in Chapter 5 and Appendix F of the Planning Statement (Application Document 7.2) and in discussed in more detail in Need for the Project (Application Document 7.1) and the Transport Assessment (Application Document 7.9).

Reference	Requirement	Project response
Reference	areas which may have impacts within them.' (paragraph 5.154) 'The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent.' (paragraph 5.155)	Project response The development of the design for the Project has had regard to DMRB GG 103 (Highways England, 2019) in terms of 'protecting, managing and enhancing the environment', as well as DMRB LD 117 (Highways England, 2020a) in terms of 'incorporating a sense of place', managing and minimising 'the impact of landscape disturbances and destruction from temporary works' and 'enhancing its environment'. The design principles which consider these requirements are set out in the Design Principles (Application Document 7.5). Section 1 within the area-specific design principles discusses the A2/M2 corridor within the Kent Downs AONB. The Project Design Report (Application Document 7.4) discusses in detail the design intent along the A2/M2 corridor within the Kent Downs AONB, including the provision of mitigation planting, enhanced recreational routes and improved green infrastructure, for example, through the use of green bridges. Figure 2.4: Environmental Masterplan (Application Document 6.2) has been prepared to show the embedded environmental mitigation measures of the Project, including those along the A2/M2 corridor within the Kent
		Downs AONB. Chapter 7: Landscape and Visual (Application Document 6.1) and Appendix 7.9: Schedule of Landscape Effects (Application Document 6.3) consider the indirect landscape effects of the Project beyond the AONB boundary on the landscape character and visual amenity of the Kent Downs AONB.
Paragraph 5.156	'Outside nationally designated areas, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England has policies based on landscape character	Section 5.1 of Priority 5 of the Kent Environment Strategy (Kent County Council, 2016) requires the establishment of a 'coherent, landscape-led approach to decision making' and a 'strategic approach to assessment of

Reference	Requirement	Project response
(Broadly consistent with Paragraph 5.9.14 of EN-1)	assessment, these should be given particular consideration. However, local landscape designations should not be used in themselves as reasons to refuse consent, as this may unduly restrict acceptable development.'	 character' The landscape and visual assessment has reviewed existing published landscape character assessments and used these to inform the Local Landscape Character Areas identified and assessed in Chapter 7: Landscape and Visual (Application Document 6.1), Appendix 7.5: Local Landscape Character Baseline, and Appendix 7.9: Schedule of Landscape Effects (Application Document 6.3), with significant effects identified that might affect decision making. These effects have been moderated, wherever practicable, through the Project design, as discussed below. Design-related policies, which require development to conserve and enhance the character of an area include the following: Sections 5.2 and 5.4 of Priority 5 of the Kent Environment Strategy (Kent County Council, 2016)
		 Policy BNE6 Landscape Design, Medway Local Plan (Medway Council, 2003) Policy CS19 Development and Design Principles, Local Plan Core Strategy (Gravesham Borough Council, 2014)
		 Principles SD2, SD3, SD8, SD9, SD11, SD12, LLC1, BD1, HCH1 and HCH2 of the Kent Downs AONB Management Plan 2021-2026, (Kent Downs AONB Unit, 2021)
		 Policies CSTP22, Part 3 and CSTP23 of the Thurrock Local Development Framework (Thurrock Council, 2015)
		Policies 12, 27 and 29 of the Havering Local Plan 2016-2031 (London Borough of Havering, 2021)

Reference	Requirement	Project response
		 Policies NE02, NE03 and NE04 of the Brentwood Local Plan 2016-2033 (Brentwood Borough Council, 2022)
		The development of the detailed Project design is required to have regard to the existing landscape character, as set out throughout the Design Principles (Application Document 7.5). Specifically, design principle LSP.01 discusses the retention of existing vegetation to reduce harm to the landscape, while design principles LSP.02, LSP.04, LSP.09, LSP.10, LSP.13, LSP.14 and LSP.20 discuss landscape mitigation measures.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) has been prepared to show the embedded environmental mitigation measures of the Project.
Paragraph 5.157 (Broadly consistent with Paragraph 5.9.17 of	'In taking decisions, the Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and	Chapter 7: Landscape and Visual (Application Document 6.1) sets out the proposed landscape and visual-specific mitigation measures in Section 7.5.
EN-1)	siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by reasonable mitigation.'	The development of the design for the Project has had regard to DMRB GG 103 (Highways England, 2019) in terms of 'protecting, managing and enhancing the environment', as well as DMRB LD 117 (Highways England, 2020a) in terms of 'incorporating a sense of place', managing and minimising 'the impact of landscape disturbances and destruction from temporary works' and 'enhancing its environment'. The design principles which consider these requirements are set out in the Design Principles (Application Document 7.5). Design principle LSP.01 discusses the retention of existing vegetation to reduce harm to the landscape, while design principles LSP.02, LSP.04, LSP.09, LSP.10, LSP.13, LSP.14 and LSP.20 discuss landscape mitigation measures.

Reference	Requirement	Project response
		Figure 2.4: Environmental Masterplan (Application Document 6.2) has been prepared to show the embedded environmental mitigation measures of the Project.
Paragraph 5.158 (Broadly consistent with Paragraph 5.9.18 of EN-1)	'Visual impact The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast, especially those defined as Heritage Coast.'	The visual impact assessment presented in Section 7.6 of Chapter 7: Landscape and Visual (Application Document 6.1) and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3) considers the effects of the Project on views and visual amenity, including those featuring the River Thames. Wherever practicable, the Project design and environmental mitigation measures have sought to reduce visual effects through the provision of false cuttings, screen planting and the integration of new structures and earthworks into the surrounding landscape. This detail is captured in the Design Principles (Application Document 7.5), with landscape-specific principles seeking to integrate the Project as much as possible provided in LSP.01 to LSP.22. Figure 2.4: Environmental Masterplan (Application Document 6.2) has been prepared to show the embedded environmental mitigation measures of the Project. In coastal areas, the South Portal and approaches would largely be obscured from views. The North Portal and approaches would largely be contained by the sculptural landscape mounding at Tilbury Fields, which has been designed as a landmark feature referencing local heritage features such as the military forts. There are no Heritage Coasts within the Project study area.
Paragraphs 5.160 and 5.161	'Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, design (including choice of materials), and landscaping schemes,	Wherever practicable, the Project design and environmental mitigation measures have sought to reduce landscape and visual effects, for example, through the

Reference	Requirement	Project response
(Broadly consistent with Paragraphs 5.9.22 and 5.9.23 of EN-1)	depending on the size and type of proposed project. Materials and designs for infrastructure should always be given careful consideration.' (paragraph 5.160) 'Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site, although if such landscaping was proposed to be consented by the development consent order, it would have to be included within the order limits for that application. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista.' (paragraph 5.161)	careful siting of construction compound elements as discussed in Table 7.16 of Chapter 7: Landscape and Visual (Application Document 6.1), or through the provision of false cuttings and screen planting as discussed in the Design Principles (Application Document 7.5). Landscape-specific design principles LSP.01 to LSP.22 seek to integrate the Project as much as possible into the surrounding landscape. In addition, there are design principles relating to the appearance of structures in STR.01 to STR.08, which require a coordinated and consistent design palette and a landscape-led design to ensure they appear as seamlessly integrated components of the landscape. The Project Design Report (Application Document 7.4) discusses in detail the design intent along the Project route, including the provision of mitigation planting, enhanced recreational routes and improved green infrastructure, for example, through the use of green bridges. Figure 2.4: Environmental Masterplan (Application Document 6.2) has been prepared to show the embedded environmental mitigation measures of the Project. This includes details of extensive planting away from the immediate Project route (but within the Order Limits), such as the areas of compensation planting for ancient woodland and nitrogen deposition to the south-east of Shorne village, eastern edge of Gravesend, near Orsett Golf Club and at Hole Farm near Brentwood.
Paragraph 5.164 (Broadly consistent with Paragraph 5.10.4 of EN-1)	'Green Belts, defined in a development plan, are situated around certain cities and large built-up areas. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their	A proportion of the Order Limits lies within London's Green Belt. An assessment of the impact on the Green Belt is set out in Appendix E of the Planning Statement (Application Document 7.2), which specifically considers the extent of any effect on the openness of the Green Belt.

Reference	Requirement	Project response
	permanence. For further information on the purposes and protection of Green Belt see the National Planning Policy Framework.'	
Paragraph 5.175	'Where networks of green infrastructure have been identified in development plans, they should normally be protected from development, and, where possible, strengthened by or integrated within it. The value of linear infrastructure and its footprint in supporting biodiversity and ecosystems should also be taken into account when assessing the impact on green infrastructure.'	There are no green infrastructure networks currently identified within development plans that are likely to be affected by the Project, although the Thames Chase Community Forest is identified where relevant. Generally, existing vegetation would be retained, wherever practicable, as stated in LSP.01 of the Design Principles (Application Document 7.5). In addition, design principles LSP.02, LSP.04, LSP.06, LSP.10, LSP.13 and LSP.14 discuss landscape mitigation measures that would contribute to green infrastructure, and design principles PEO.01 to PEO.11 discuss provision and/or enhancement to walking, cycling, horse-riding (WCH) networks. The Lower Thames Crossing Green Infrastructure Study in Appendix H of the Planning Statement (Application Document 7.2) sets out proposals to contribute to the wider Green Infrastructure surrounding the Project. The Project Design Report (Application Document 7.4) discusses in detail the design intent along the Project route, including the provision of mitigation planting, enhanced recreational routes and improved green infrastructure, for example, through the use of green bridges. Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project including the provision of new green infrastructure along the Project route, as well
Paragraph 5.180	'Where green infrastructure is affected, applicants should	as new green bridges. The Lower Thames Crossing Green Infrastructure Study
	aim to ensure the functionality and connectivity of the green	in Appendix H of the Planning Statement (Application

Reference	Requirement	Project response
(Broadly consistent with Paragraph 5.10.20 of	ragraph 5.10.20 of works are undertaken, where possible, to mitigate any	Document 7.2) sets out proposals to contribute to the wider Green Infrastructure surrounding the Project.
EN-1)		The aim to generate a positive legacy of green infrastructure is set out within the Project Design Report (Application Document 7.4) and design principle LSP.06 of the Design Principles (Application Document 7.5).
		In addition, as stated above, design principles LSP.02, LSP.04, LSP.06, LSP.10, LSP.13 and LSP.14 discuss landscape mitigation measures that would contribute to green infrastructure, and design principles PEO.01 to PEO.11 discuss provision and/or enhancement to WCH networks.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project including the provision of new green infrastructure along the Project route and WCH routes, and within areas of open space.
Overarching National P	olicy Statement for Energy (EN-1) (Department of Energy a	and Climate Change, 2011a)
Paragraph 5.9.8	'Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.'	The majority of this text from EN-1 is the same as paragraph 5.149 in the National Policy Statement for National Networks. However, it expands on what should be considered with regard to local landscapes, stating that the quality and value of the landscape should be understood, along with its capacity to accommodate change. These aspects have been considered for the various landscape/marine character areas in Section 7.4 of Chapter 7: Landscape and Visual (Application Document 6.1) and Tables 1.1 to 1.3 in Appendix 7.9: Schedule of Landscape Effects (Application Document 6.3).
		In addition, the text from EN-1 states that 'virtually all nationally significant energy infrastructure projects will

Requirement	Project response
	have effects on the landscape'. Landscape effects arising from the Project as a whole have been assessed in Section 7.6 of Chapter 7: Landscape and Visual, and Appendix 7.9: Schedule of Landscape Effects. Significant effects have been identified that might affect decision making. However, these effects have been moderated, wherever practicable, through the Project design. For example, LSP.01 of the Design Principles (Application Document 7.5) discusses the retention of existing vegetation to reduce harm to the landscape. Design principles LSP.02, LSP.04, LSP.09, LSP.10, LSP.13 and LSP.14 discuss landscape mitigation measures that would help to integrate features, such as the base of pylons.
'The scale of such projects means that they will often be visible within many miles of the site of the proposed infrastructure. The IPC ⁴ should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.'	Landscape and visual effects arising from the Project as a whole have been assessed in Section 7.6 of Chapter 7: Landscape and Visual (Application Document 6.1), Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3). Significant effects have been identified that might affect decision making. However, these effects have been moderated, wherever practicable, through the Project design. For example, LSP.01 of the Design Principles (Application Document 7.5) discusses the retention of existing vegetation to reduce harm to the landscape and the level of change in views. Design principles LSP.02, LSP.04, LSP.09, LSP.10, LSP.13 and LSP.14 discuss landscape mitigation measures that would help to soften the appearance of some features, such as the base of pylons. The benefits provided by the Project are described in Need for the Project (Application Document 7.1), with the
	'The scale of such projects means that they will often be visible within many miles of the site of the proposed infrastructure. The IPC ⁴ should judge whether any adverse impact on the landscape would be so damaging that it is not

⁴ IPC relates to Infrastructure Planning Commission

Reference	Requirement	Project response
		planning balance discussed in Chapter 7 of the Planning Statement (Application Document 7.2).
Paragraph 5.9.16	'In reaching a judgment, the IPC should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the IPC considers reasonable.'	Temporary and permanent landscape and visual effects have been assessed in Section 7.6 of Chapter 7: Landscape and Visual (Application Document 6.1), Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3).
		Effects on landscape character and views would generally reduce by year 15 of operation (summer of design year) once mitigation planting has established. However, significant residual effects would remain. These are described in Section 7.9 of Chapter 7: Landscape and Visual (Application Document 6.1).
Paragraph 5.9.18	'All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites'	Visual effects arising from the Project as a whole have been assessed in Section 7.6 of Chapter 7: Landscape and Visual (Application Document 6.1) and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3). Significant effects have been identified that might affect decision making. However, these effects have been moderated, wherever practicable, through the Project design. For example, LSP.01 of the Design Principles (Application Document 7.5) discusses the retention of existing vegetation to reduce the level of change in views. Design principles LSP.02, LSP.04, LSP.09, LSP.10, LSP.13 and LSP.14 discuss landscape mitigation measures that would help to soften the appearance of some features, such as the base of pylons.
Paragraph 5.9.19	'It may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on sensitive receptors. This	Changes in overhead lines (OHL) being undertaken as part of the Project have been described in the context of existing OHL, in order to demonstrate similarities and differences between the existing and proposed situations.

Reference	Requirement	Project response
	may assist the IPC in judging the weight it should give to the assessed visual impacts of the proposed development.'	This has been undertaken for relevant visual receptors in Appendix 7.10: Schedule of Visual Effects (Application Document 6.3).
National Policy State 2011b)	ement for Gas Supply Infrastructure and Gas and Oil Pipeline	s (EN-4) (Department of Energy and Climate Change,
Paragraph 2.21.1	'Additional considerations apply during the construction of a pipeline (which, without mitigation, can affect both landscape and ecology). These comprise the effect upon specific landscape elements within and adjacent to the pipeline route, such as grasslands, field boundaries (hedgerows, hedgebanks, drystone walls, fences), trees, woodlands, and watercourses. There will also be temporary visual impacts caused by the need to access the working corridor and to remove flora and soil. The working width of the pipeline will vary depending on the surrounding terrain. Temporary impacts could include large excavations where deep pits are needed for boring beneath rivers, roads and sensitive features.'	Temporary and permanent landscape and visual effects arising from the Project as a whole have been assessed in Section 7.6 of Chapter 7: Landscape and Visual (Application Document 6.1), Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3). Significant effects have been identified that might affect decision making. However, these effects have been moderated, wherever practicable, through the Project design. For example, LSP.01 of the Design Principles (Application Document 7.5) discusses the retention of existing vegetation to reduce harm to the landscape and the level of change in views. Design principles LSP.02, LSP.04, LSP.09, LSP.10, LSP.13 and LSP.14 discuss landscape mitigation measures that would help to replace features removed during construction, where utility easements allow.
Paragraph 2.21.2	 'Long term impacts upon the landscape for pipelines are likely to be limited, as once operational the main infrastructure is usually buried. They are likely to include: limitations on the ability to replant landscape features such as hedgerows or deep-rooted trees over or adjacent to the pipeline; and structures and indication points necessary to identify the pipeline route and provide it with service access.' 	Where mitigation measures cannot be provided within utility easements, this has been taken into account in the design on the Figure 2.4: Environmental Masterplan (Application Document 6.2), with the implications assessed in Section 7.6 of Chapter 7: Landscape and Visual (Application Document 6.1), Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3).
Paragraph 2.21.3	'The application should also include proposals for reinstatement of the pipeline route as close to its original	Reinstatement works relating to pipeline routes, and any access arrangements for landowners, have been shown

Reference	Requirement	Project response
	state as possible and take into account any requirements for agreements with the landowner to access areas for aftercare and management work. Where it is unlikely to be possible to restore landscape to its original state, the applicant should set out measures to avoid, mitigate, or employ other landscape measures to compensate for, any adverse effect on the landscape.'	on Figure 2.4: Environmental Masterplan (Application Document 6.2). Wherever practicable, land has been proposed to be reinstated as close to its original state as possible, as stated in the Register of Environmental Actions and Commitments (REAC) (REAC Ref. LV002), which forms part of Appendix 2.2: the Code of Construction Practice (CoCP) (Application Document 6.3). However, there are instances where planting cannot be fully reinstated due to utility easements. Wherever practicable, planting has been reinstated nearby to provide integration and screening, or has been compensated for elsewhere within the Order Limits. Where this has not been possible, the implications have been assessed in Section 7.6 of Chapter 7: Landscape and Visual (Application Document 6.1), Appendix 7.9: Schedule of Landscape Effects and Appendix 7.10: Schedule of Visual Effects (Application Document 6.3).
Paragraph 2.21.5	'Mitigation measures to protect the landscape and ecology could include reducing the working width required for the installation of the pipeline in order to reduce the impact on the landscape where it will not be possible to fully reinstate the route.'	The working width required for pipelines would be kept to a minimum, as stated in the REAC (REAC Ref. LV001), which forms part of Appendix 2.2: the CoCP (Application Document 6.3).
Paragraph 2.21.6	'In circumstances where the habitat to be crossed contains ancient woodland, trees subject to a Tree Preservation Order, or hedgerows subject to the Hedgerows Regulations 1997, the applicant should consider whether it would be feasible to use horizontal direct drilling under the ancient woodland or thrust bore under the protected tree or hedgerow and the IPC should consider requiring this, where not included in the proposal.'	The general approach of the Project has been to reduce the removal of trees and vegetation for the installation of utilities, including designated/protected vegetation, as far as reasonably practicable, in line with the REAC (REAC Ref. LV001), which forms part of Appendix 2.2: the CoCP (Application Document 6.3). REAC Ref. LV013 also states 'Where excavation for installation of utilities would require the removal of ancient woodland, trees subject to tree preservation orders or hedgerows subject to the Hedgerows Regulations 1997, trenchless installation methods will be used to avoid removal where reasonably

Reference	Requirement	Project response
		practicable, unless this would give rise to new or materially different environmental effects.'
National Policy Staten	nent for Electricity Networks Infrastructure (EN-5) (Departme	ent of Energy and Climate Change, 2011c)
Paragraph 2.8.3	'Sometimes positive landscape and visual benefits can arise through the reconfiguration or rationalisation of existing electricity network infrastructure.'	Where the diversion or removal of OHL proposed as part of the Project has the potential to result in beneficial visual effects, this has been noted for the relevant visual receptors in Appendix 7.10: Schedule of Visual Effects (Application Document 6.3). Generally, beneficial effects are fairly limited, as diverted routes would often appear similar to existing, or sections of OHL would remain where nearby OHL routes are proposed for removal.
Paragraph 2.8.4	'Where possible, applicants should follow the principles below in designing the route of their overhead line proposals and it will be for applicants to offer constructive proposals for additional mitigation of the proposed overhead line The ES should set out details of how consideration has been given to undergrounding or sub-sea cables as a way of mitigating such impacts, including, where these have not been adopted on grounds of additional cost, how the costs of mitigation have been calculated.'	The OHL works on the Project comprise the diversion and removal of existing routes. Diverted routes need to be in a similar geographical area to existing routes in order to connect into the retained sections of OHL. Opportunities for mitigation are therefore limited to the provision of suitable planting, wherever practicable, to help soften the appearance of pylons, while taking into account utility easements as stated in STR.13 of the Design Principles (Application Document 7.5). Planting is shown on Figure 2.4: Environmental Masterplan (Application Document 6.2). Undergrounding of diverted OHL has not been possible due to complex installation methods required, the requirement for additional permanent land take, and the increased network complexity, as described in ES Chapter
		3: Assessment of Reasonable Alternatives (Application Document 6.1).
Paragraph 2.8.5 (and paragraph 2.8.6 that	'Guidelines for the routeing of new overhead lines, the Holford Rules, were originally set out in 1959 by Lord Holford, and are intended as a common sense approach to the routeing of new overhead lines. These guidelines were	The Holford Rules were created for the routeing of new OHL. The OHL works on the Project comprise the diversion and removal of existing routes. Diverted routes need to be in a similar geographical area to existing routes

Reference	Requirement	Project response
contains the detail of the Holford Rules)	reviewed and updated by the industry in the 1990s and should be followed by developers when designing their proposals.'	in order to connect into the retained sections of OHL. The locations of the diverted OHL avoid sensitive features such as woodland blocks, wherever practicable. However, opportunities for applying the Holford Rules on the Project are limited.
Paragraph 2.8.10	'In addition to following the principles set out in the Holford Rules and considering undergrounding, the main opportunities for mitigating potential adverse landscape and visual impacts of electricity networks infrastructure are: • consideration of network reinforcement options (where alternatives exist) which may allow improvements to an existing line rather than the building of an entirely new line; and • selection of the most suitable type and design of support structure (i.e. different lattice tower types, use of wooden poles etc) in order to minimise the overall visual impact on the landscape.'	This paragraph from EN-5 does not really apply to the Project, as the OHL works comprise the diversion and removal of existing routes, rather than the provision of new routes. The general approach to the OHL diversions has been to replicate the existing situation as much as possible, albeit in a slightly different location. While this approach would generally not result in beneficial landscape and visual effects, the potential for adverse landscape and visual effects is greatly reduced.
Paragraph 2.8.11	'There are some more specific measures that might be taken, and which the IPC could require through requirements if appropriate, as follows: • Landscape schemes, comprising off-site tree and hedgerow planting are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These can only be implemented with the agreement of the relevant landowner(s) and advice from the relevant statutory advisor may also be needed; and • Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect	This paragraph from EN-5 does not really apply to the Project, as the OHL works comprise the diversion and removal of existing routes, rather than the provision of new routes. Suitable planting has been proposed, wherever practicable, to help soften the appearance of pylons, while taking into account utility easements as stated in STR.13 of the Design Principles (Application Document 7.5). Planting is shown on Figure 2.4: Environmental Masterplan (Application Document 6.2).

Reference	Requirement	Project response
	of the line, reducing the visual impact from a particular receptor.'	
National Planning Police	y Framework (NPPF) (Ministry of Housing, Communities a	and Local Government, 2021)
Chapter 12: Achieving well-designed places Paragraph 134	'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to [] outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'	 Relevant local design policies/ principles taken into account in the Project design comprise the following: Medway Local Plan, S4 Landscape and Urban Design and BNE6 Landscape Design: Requires a landscaping scheme that enhances local character. Gravesham Local Plan, CS19 Development and Design Principles: Requires development to be visually attractive, fit for purpose, locally distinctive and in keeping with local character. Kent Downs AONB Management Plan 2021-2026, Principles (a material consideration), SD2, SD12, HCH6 and AEU13: Design should be of a high standard, conserve and enhance the local character, quality, distinctiveness and natural resources of the AONB, and be mitigated by sympathetic landscaping. Transport and infrastructure should fit unobtrusively into the landscape, with associated signage and furniture that conserves and enhances the local character and distinctiveness. Kent Downs AONB Landscape Design Handbook: Design should conserve and enhance the special characteristics of the AONB as a whole, and the distinctiveness of its individual character areas. Thurrock Local Development Framework, CSTP22 Thurrock Design: Design should be of high quality, improve the quality of the environment and fit the local context.

Reference	Requirement	Project response
		Thurrock Design Guide: Design proposals should respond positively to a given location and take account of existing character.
		 Havering Local Plan, Policy 27 Landscaping: Requires development to retain or enhance local character
		The development of the design for the Project has had regard to DMRB GG 103 (Highways England, 2019) in terms of 'protecting, managing and enhancing the environment', as well as DMRB LD 117 (Highways England, 2020a) in terms of 'incorporating a sense of place' and 'enhancing its environment', as set out in the Design Principles (Application Document 7.5).
		The Project-wide design principles that help address local design policies by requiring the landscape design to take account of local landscape character (local policies BNE6, CSTP22, CS19 and CP17) comprise:
		 LSP.02 planting strategy of species selection and planting pattern to fit with landscape context;
		 LSP.03 grading of earthworks to respect local landscape character;
		 LSP.05 landscape reinstatement to its original use;
		 LSP.07 respecting historic landscape views, land use and pattern;
		 LSP.09 false cutting design appropriate to surrounding landscape character;
		 LSP.14 boundary hedgerow planting in keeping with existing landscape character;
		LSP.17 naturalistic attenuation pond design in keeping with wider setting;

Reference	Requirement	Project response
		 LSP.18 graded chalk cuttings to allow the establishment of chalk grassland; and
		 STR.09 materiality and appearance of barriers and fences that reflect landscape context.
		The Project-wide design principles requiring development to be visually attractive, locally distinctive and fit for purpose (local policy CS19) comprise:
		 LSP.04 planting strategy to integrate the road into the adjacent landscape;
		 LSP.06 design that maximises the Project's legacy;
		 LSP.13 hedgerow reinstatement at field and roadside boundaries;
		 LSP.17 naturalistic attenuation pond design in keeping with wider setting; and
		 LSP.20 Wildflower seeding on earthworks.
		The area-specific design principles (Section 1 – A2/M2 Corridor) that help address principles to conserve and enhance the local character, quality and distinctiveness of the Kent Downs AONB (Kent Downs AONB Management Plan 2021-2026 principles SD2, SD12, HCH6 and AEU13) comprise:
		 S1.01 retention or reinstatement of the historic woodland landscape character north of the A2/M2 corridor;
		 S1.02 retention or reinstatement of woodland south of the A2/M2 corridor;
		 S1.03 minimising the Project footprint within the A2/M2 corridor;
		 S1.06 reflecting surrounding landscape character of the Kent Downs AONB;

Reference	Requirement	Project response
		 S1.07 Planting palette within the AONB and its setting; and S1.09 Retaining structures and bridge abutments, designed to be reflective of the local vernacular. The Project-wide design principle STR.07 Bridge structures, covers the design quality and materiality of bridge structures and other infrastructure features, and considers their integration with the local landscape context. Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures along the route of the Project. These mitigation measures help to address local design policies through the provision of a landscaping scheme that is responsive to existing landscape character.
Chapter 13: Protecting Green Belt land Paragraphs 137 and 138	'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.' 'Green Belt serves five purposes: a. to check the unrestricted sprawl of large built-up areas; b. to prevent neighbouring towns merging into one another; c. to assist in safeguarding the countryside from encroachment; d. to preserve the setting and special character of historic towns; and e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'	A large proportion of the Order Limits lies within London's Green Belt. An assessment of the impact on the Green Belt is set out in Appendix E of the Planning Statement (Application Document 7.2), which specifically considers the protection of the permanent openness of the Green Belt.

Reference	Requirement	Project response
Paragraph 146	'The National Forest and Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife. The National Forest Strategy and an approved Community Forest Plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within the National Forest and Community Forests in the Green Belt should be subject to the normal policies for controlling development in Green Belts.'	 The Project passes through Thames Chase Community Forest. The planning implications of this are considered in Appendix D of the Planning Statement (Application Document 7.2). Within the Design Principles (Application Document 7.5), the area-specific design principles (Section 13 & 14 – M25 junctions) that help address development proposals within the Thames Chase Community Forest by supporting recreation and wildlife comprise: S14.03 Planting at Thames Chase Community Forest; S14.04 Thames Chase Community Forest bridge; and S14.06 Earthworks within Thames Chase Community Forest.
Paragraphs 147 and 148	Proposals affecting the Green Belt 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'	A large proportion of the Order Limits lies within London's Green Belt. An assessment of the impact on the Green Belt is set out in Appendix E of the Planning Statement (Application Document 7.2), which specifically considers the potential harm to the Green Belt.
Chapter 15: Conserving and enhancing the natural environment	'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural	The Project would fall partially within the north-western extent of the Kent Downs AONB to the west of the River Medway, with a nitrogen deposition compensation site within the Kent Downs AONB south of Chatham.

Reference	Requirement	Project response
Paragraphs 176 and 177	heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited' ' [Planning] permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a. the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b. the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c. any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'	Chapter 4 and Appendix F of the Planning Statement (Application Document 7.2) discuss the Project in relation to the Kent Downs AONB, including how the special status of the designated area has been taken into account in terms of route selection and the design of the Project. Chapter 5 and Appendix F of the Planning Statement (Application Document 7.2) also discuss whether there are exceptional circumstances relating to the Project and the Kent Downs AONB. The need for the Project is also summarised in Chapter 3 of the Planning Statement, and is discussed in detail in Need for the Project (Application Document 7.1). An assessment of the cost and scope of locating the Project outside the designated area is included in Chapter 4 of the Planning Statement (Application Document 7.2). In addition, ES Chapter 3: Assessment of Reasonable Alternatives (Application Document 6.1) and the Need for the Project (Application Document 7.1) set out the assessment of alternatives and the reasoning for the selection of the Project. Detrimental effects on the environment, the landscape and recreational opportunities within the Kent Downs AONB are identified in Chapter 5 and Appendix F of the Planning Statement (Application Document 7.2). There is also a discussion of the extensive design principles and mitigation measures proposed to help moderate these effects. Within the Design Principles (Application Document 7.5), the area-specific principles (Section 1 – A2/M2 Corridor) that support 'conserving and enhancing landscape and scenic beauty' of the Kent Downs AONB comprise:

Reference	Requirement	Project response
		 S1.01 retention or reinstatement of the historic woodland landscape character north of the A2/M2 corridor;
		 S1.02 retention or reinstatement of woodland south of the A2/M2 corridor;
		 S1.03 minimising the Project footprint within the A2/M2 corridor;
		 S1.06 reflecting surrounding landscape character of the Kent Downs AONB; and
		 S1.07 Planting palette within the AONB and its setting.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) has been prepared to show the embedded environmental mitigation measures of the Project, including those along the A2/M2 corridor within the Kent Downs AONB.

Table 1.3 Landscape regional and local planning policies and relevant guidance documents

Strategy/plan	Relevant planning policy/ guidance	Project response		
Kent County Council				
Kent County Counce Vision for Kent 2012-2022 (Kent County Council, 2012)		There are embedded and essential mitigation measures that would reduce adverse effects associated with the Project and enhance the natural environment of Kent. These are described in the Project Design Report (Application Document 7.4) and Design Principles (Application Document 7.5). The Project-wide design principles that help address policy, for example, requiring the landscape design to protect and enhance the environment, comprise: LSP.01 Retention of existing vegetation; LSP.04 planting strategy to integrate the road into the adjacent landscape; LSP.06 design that maximises the Project's legacy; LSP.07 respecting historic landscape views, land use and pattern; LSP.13 hedgerow reinstatement at field and roadside boundaries; LSP.17 naturalistic attenuation pond design in keeping with wider setting; and LSP.18 graded chalk cuttings to allow the establishment of chalk grassland. The area-specific principles (Section 1 – A2/M2 Corridor, Section 2 – M2/A2/Lower Thames Crossing junction and Section 3, 4 & 5 – Gravesend link and South Portal) that support Kent County Council policy to protect and enhance the environment comprise: S1.04 new green bridges over the A2/M2 corridor at Brewers Road and Thong Lane; S1.06 reflecting surrounding landscape character of the Kent Downs AONB; and		
		 S3.04 Chalk Park, a new recreational park to the west of the South Portal. Figure 2.4: Environmental Masterplan 		
		(Application Document 6.2) has been		

Strategy/plan	Relevant planning policy/ guidance	Project response
		prepared to show the embedded environmental mitigation measures of the Project.
Kent Environment Strategy (Kent County Council, 2016)	This strategy and associated implementation plan seek to provide support to decision makers in ensuring that the county of Kent remains a 'highly desirable location of choice for visitors, residents and businesses'. Of particular relevance to the Project is Priority 5:	The embedded and essential mitigation measures that would reduce adverse effects associated with the Project and enhance the natural resources and assets of Kent are described in the Project Design Report (Application Document 7.4) and Design Principles (Application Document 7.5). The Project-wide design principles that
	Project is Priority 5: Conserve and enhance the quality and supply of the county of Kent's natural	help address this policy, requiring the Project to conserve and enhance the quality and supply of the county of Kent's natural resources and assets, comprise:
	resources and assets.	 LSP.06 design that maximises the Project's legacy;
		 LSP.07 respecting historic landscape views, land use and pattern;
		 LSP.13 hedgerow reinstatement at field and roadside boundaries;
		 LSP.17 naturalistic attenuation pond design in keeping with wider setting; and
		 LSP.18 graded chalk cuttings to allow the establishment of chalk grassland.
		The area-specific principles (Section 1 – A2/M2 Corridor, Section 2 – M2/A2/Lower Thames Crossing junction and Section 3, 4 & 5 – Gravesend link and South Portal) that support Kent County Council policy to conserve and enhance the quality and supply of the county of Kent's natural resources and assets comprise:
		 S1.04 new green bridges over the A2/M2 corridor at Brewers Road and Thong Lane;
		 S1.06 reflecting surrounding landscape character of the Kent Downs AONB; and
		S3.04 Chalk Park, a new recreational park to the west of the South Portal.
Kent Design Guide (Kent Design Initiative, including Kent County Council, 2005)	2.1 Understanding the Site2.2 Generating the Layout	The Project-wide design principles that help address design guidance related to restoring, protecting, managing and enhancing the character of Kent, its green

Strategy/plan	Relevant planning policy/ guidance	Project response
	guidance	 assets, or creating new green assets, and promoting high quality design, comprise: LSP.01 Retention of existing vegetation; LSP.02 planting strategy of species selection and planting pattern to fit with landscape context; LSP.03 grading of earthworks to
		 respect local landscape character; LSP.04 planting strategy to integrate the road into the adjacent landscape; LSP.05 landscape reinstatement to its original use;
		 LSP.07 respecting historic landscape views, land use and pattern; LSP.09 false cutting design appropriate to surrounding landscape character;
		 LSP.14 boundary hedgerow planting in keeping with existing landscape character; LSP.17 naturalistic attenuation pond
		design in keeping with wider setting;andLSP.20 Wildflower seeding on
		earthworks. The area-specific principles (Section 1 – A2/M2 Corridor, Section 2 – M2/A2/Lower Thames Crossing junction and Section 3, 4 & 5 – Gravesend link and South Portal) comprise:
		 S1.01 Woodland north of the A2/M2 Corridor; S1.02 Planting to the south of the A2/M2 Corridor;
		 A2/M2 Corridor; S1.06 reflecting surrounding landscape character of the Kent Downs AONB;
		 S1.07 Planting palette within the AONB and its setting; S2.01 Wooded circle around Thong;
		S2.03 Woodland planting around slip roads;
		S2.07 Retained vegetation;S3.01 Retain open views; and

Strategy/plan	Relevant planning policy/ guidance	Project response
		S3.04 Chalk Park, a new recreational park to the west of the South Portal. Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project.
Consultation Draft Kent Design Guide website (Kent County Council, 2021)	 Protecting our natural heritage Fit naturally into the surroundings Keep it specific Take cues from the surroundings 	Within the Design Principles (Application Document 7.5), the Project-wide design principles and area-specific design principles that help address design guidance related to restoring, protecting, managing and enhancing the character of Kent, its green assets, or creating new green assets, and promoting high quality design, are as described above for the Kent Design Guide (Kent Design Initiative, including Kent County Council, 2005).
Essex County Cour	ncil	
Annual Plan 2022 – 2023 (Essex County Council, 2022)	One of the four strategic aims is 'High Quality Environment'. Part of this strategic aim is to have achieved the following by the end of the Annual Plan: • '5. Developed the quality and accessibility of our natural environment and green infrastructure so that it enhances quality of life for all our residents.'	Within the Design Principles (Application Document 7.5), the Project-wide design principles and area-specific principles (Section 13 & 14 – M25 junctions) that help address the strategic aim related to the quality and accessibility of the natural environment and green infrastructure comprise: LSP.01 Retention of existing vegetation; LSP.02 planting strategy of species selection and planting pattern to fit with landscape context; LSP.04 planting strategy to integrate the road into the adjacent landscape; LSP.06 design that maximises the Project's legacy including enhanced access, amenities and green infrastructure; LSP.10 junction planting to screen structures within the junctions; LSP.19 Ancient woodland compensation, to achieve most ecologically beneficial woodland habitat; S14.01 woodland planting at the Project junction with the M25; and S14.12 Open space and woodland compensation.

		Ciarra O A. Carring and a Magtamalan
		Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project.
Greater London Authority		
The London Plan 2021 – The Spatial Development Strategy for Greater London (Greater London Authority, Policy Green Policy	G4 Open space G7 Trees and	Within the Design Principles (Application Document 7.5), the Project-wide design principles and area-specific principles (Section 13 & 14 – M25 junctions) that help address the London Plan policies related to protecting and enhancing the green infrastructure and open space (local policies G1 and G4) comprise: LSP.04 planting strategy to integrate the road into the adjacent landscape; LSP.06 design that maximises the Project's legacy including enhanced access, amenities and green infrastructure; S14.03 Planting at Thames Chase Community Forest bridge; and S14.12 Open space and woodland compensation. Green infrastructure design measures are also described in the Project Design Report (Application Document 7.4) and include the enhancement and improvements to the WCH routes and a new Thames Chase Community Forest footbridge to Thames Chase Forest Centre (also design principle S14.04 Thames Chase Community Forest bridge). A large proportion of the Order Limits lies within London's Green Belt. An assessment of the impact on the Green Belt (Policy G2) is set out in Appendix E of the Planning Statement (Application Document 7.2), which specifically considers the protection of the permanent openness of the Green Belt. Within the Design Principles (Application Document 7.5), the Project-wide design principles and area-specific principles (Section 13 & 14 – M25 junctions) that help address the policy related to

Strategy/plan	Relevant planning policy/ guidance	Project response
		forest with new tree and woodland planting (Policy G7) comprise: LSP.01 Retention of existing vegetation; LSP.10 junction planting to screen structures within the junctions; LSP.19 Ancient woodland compensation, to achieve most ecologically beneficial woodland habitat; S14.01 woodland planting at the project junction with the M25; S14.02 woodland planting to field boundaries (between FP151 and the B186); S14.03 Planting at Thames Chase Community Forest; S14.07 Planting north of Ockendon Road; and S14.12 Open space and woodland compensation. Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project.
Maidstone Borough	Council	
Maidstone Borough Local Plan (Maidstone Borough Council, 2017)	 SP17 The Countryside DM1 Principles of Good Design DM3 Natural Environment DM30 Design Principles in the Countryside 	Part of a nitrogen deposition compensation site would be located within the Maidstone Borough as part of the Project. This would primarily comprise the creation of woodland and grassland habitat areas. Chapter 2: Project Description (Application Document 6.1) includes a general description of the nitrogen deposition compensation site, with principles discussed in the Outline Landscape and Ecology Management Plan (oLEMP) (Application Document 6.7) and greater detail provided in Appendix 5.6 Project Air Quality Action Plan (PAQAP) (Application Document 6.3). Within the Design Principles (Application Document 7.5), the Project-wide design principles that help to address the local policies requiring the Project to maintain and enhance the distinctive character of the countryside, protect and enhance the

Strategy/plan	Relevant planning policy/ guidance	Project response
Maidstone Landscape Character Assessment Supplement 2012 saved sections of the Maidstone Landscape Character Assessment & Landscape Guidelines 2000 (Maidstone Borough Council, 2012)	 Typical planting mixes for landscape character types: Dry valleys and downs (chalk and claywith-flints) General landscape guidance Planting proposals Special issues 	natural environment and create a high-quality design, comprise: LSP.01 Retention of existing vegetation; LSP.02 planting strategy of species selection and planting pattern to fit with landscape context; and LSP.06 design that maximises the Project's legacy. Details of the nitrogen deposition compensation site are provided above for Maidstone Borough Local Plan (Maidstone Borough Council, 2017). Within the Design Principles (Application Document 7.5), the Project-wide and area-specific design principles that help to address the guidance on proposed planting are: LSP.02 planting strategy of species selection and planting pattern to fit with landscape context; LSP.06 design that maximises the Project's legacy; LSP.11 Planting palettes; LSP.15 Planting densities; LSP.24 Planting – Key views/vistas; LSP.25 Planting – Openness; LSP.26 Planting – Screening; and S1.18 Blue Bell Hill Nitrogen Deposition Compensation Site.
Green and Blue Infrastructure Strategy (Maidstone Borough Council, June 2016)	 Theme 1: Mitigating and adapting to climate change Theme 3: Promoting a distinctive townscape and landscape 	Details of the nitrogen deposition compensation site are provided above for Maidstone Borough Local Plan (Maidstone Borough Council, 2017). The aim to generate a positive legacy of green infrastructure is set out within the Project Design Report (Application Document 7.4) and design principle LSP.06 Landscape legacy, of the Design Principles (Application Document 7.5). The Project Design Report (Application Document 7.4) also describes measures to retain the historical woodland landscape character within the Kent Downs AONB and strengthen its sense of place for users of that landscape.

Strategy/plan	Relevant planning policy/ guidance	Project response
		Within the Design Principles (Application Document 7.5), the Project-wide and area-specific design principles that help to address green infrastructure are:
		LSP.02 planting strategy of species selection and planting pattern to fit with landscape context;
		 LSP.06 design that maximises the Project's legacy;
		LSP.11 Planting palettes;
		LSP.15 Planting densities;
		 LSP.24 Planting – Key views/vistas;
		LSP.25 Planting – Openness;
		LSP.26 Planting – Screening; and
		S1.18 Blue Bell Hill Nitrogen Deposition Compensation Site.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project.
Tonbridge and Malli	ing Borough Council	
Tonbridge and Malling Borough Council Local Development Framework, Core Strategy (Tonbridge and Malling Borough Council, 2007)	 CP14 Development in the Countryside CP24 Achieving a High Quality Environment 	Part of a nitrogen deposition compensation site would be located within the Tonbridge and Malling Borough as part of the Project. This would primarily comprise the creation of woodland and grassland habitat areas. Chapter 2: Project Description (Application Document 6.1) includes a general description of the nitrogen deposition compensation site, with principles discussed in the oLEMP (Application Document 6.7) and greater detail provided in Appendix 5.6: PAQAP (Application Document 6.3). Within the Design Principles (Application Document 7.5), the Project-wide design principles that help to address the local policies requiring the Project to maintain the rural location, respect the site and its surroundings and make a positive contribution to the area, comprise:
		LSP.01 Retention of existing vegetation;
		LSP.02 planting strategy of species selection and planting pattern to fit with landscape context; and

Strategy/plan	Relevant planning policy/ guidance	Project response
		LSP.06 design that maximises the Project's legacy.
Medway Council		
Medway Local Plan (Medway Council, 2003)	 S4 Landscape and Urban Design BNE6 Landscape Design BNE22 Environmental Enhancement 	The Project would be located within the adjacent Gravesham District Council authority area and just beyond the western boundary of the Medway Council authority area. No local policies would therefore be directly affected. The study area for Chapter 7: Landscape and Visual (Application Document 6.1) extends slightly into the Medway Council authority area, as vegetation removal would take place along the M2 corridor at the western tip of Strood, with views from nearby residential properties affected. Where practicable, vegetation removed during construction would be reinstated to reflect the local character, enhance the character of the locality and protect the appearance of the environment, as required by local policies S4, BNE6 and BNE22. Within the Design Principles (Application Document 7.5), the Project-wide design principles that help to address the local policies comprise: LSP.01 Retention of existing vegetation; LSP.02 planting strategy of species selection and planting pattern to fit with landscape context; and LSP.04 planting strategy to minimise the visual impact of the Project.
Gravesham Boroug	h Council	
Gravesham Local Plan Core Strategy (Gravesham Borough Council, 2014)	 Policy CS12 Green Infrastructure Policy CS19 Development and Design Principles 	The aim to generate a positive legacy of green infrastructure is set out within the Project Design Report (Application Document 7.4) and design principle LSP.06 Landscape legacy, of the Design Principles (Application Document 7.5). The Project Design Report (Application Document 7.4) also describes measures to retain the historical woodland landscape character within the Kent Downs AONB and strengthen its sense of place for users of that landscape and the road. Within the Design Principles (Application Document 7.5), Project-wide design

Strategy/plan	Relevant planning policy/ guidance	Project response
		principles LSP.02, LSP.04, LSP.06, LSP.10, LSP.13 and LSP.14 discuss landscape mitigation measures that would contribute to green infrastructure, and design principles PEO.01 to PEO.11 discuss provision and/or enhancement to WCH networks.
		The area-specific design principles (Section 1 – A2/M2 Corridor) that help address the local design policy requiring the Project to protect and enhance the Kent Downs AONB (local policy CS12), comprise:
		 S1.01 retention or reinstatement of the historic woodland landscape character north of the A2/M2 corridor;
		 \$1.02 retention or reinstatement of woodland south of the A2/M2 corridor;
		 S1.03 minimise the Project footprint within the A2/M2 corridor;
		 S1.06 design and mitigation to reflect surrounding landscape character of the Kent Downs AONB; and
		 S1.07 Planting palette within the AONB and its setting.
		In relation to local policy CS19, the development of the design for the Project has had regard to DMRB GG 103 (Highways England, 2019) in terms of 'protecting, managing and enhancing the environment', as well as DMRB LD 117 (Highways England, 2020a) in terms of 'incorporating a sense of place' and 'enhancing its environment', as set out in the Design Principles (Application Document 7.5).
		The Project-wide design principles that help address local policy CS19, by requiring the landscape design to take account of local context and character comprise:
		 LSP.02 planting strategy of species selection and planting pattern to fit with landscape context;
		 LSP.03 grading of earthworks to respect local landscape character;
		LSP.05 landscape reinstatement to its original use;

Strategy/plan	Relevant planning policy/ guidance	Project response
		LSP.07 respecting historic landscape views, land use and pattern;
		LSP.09 false cutting design appropriate to surrounding landscape character;
		 LSP.14 boundary hedgerow planting in keeping with existing landscape character;
		 LSP.17 naturalistic attenuation pond design in keeping with wider setting;
		 LSP.18 graded chalk cuttings to allow the establishment of chalk grassland; and
		STR.09 materiality and appearance of barriers and fences that reflect landscape context.
		The Project-wide design principles requiring development to be visually attractive, locally distinctive and fit for purpose (local policy CS19) comprise:
		 LSP.04 planting strategy to integrate the road into the adjacent landscape;
		LSP.06 design that maximises the Project's legacy;
		 LSP.13 hedgerow reinstatement at field and roadside boundaries;
		 LSP.17 naturalistic attenuation pond design in keeping with wider setting; and
		 LSP.20 Wildflower seeding on earthworks.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project.
Thurrock Council		
Core Strategy and Policies for Management of Development (Thurrock Council, 2015)	 Chapter 4: Spatial Policies Policy CSSP4 Sustainable Green Belt Policy CSSP5 Sustainable Greengrid 	A proportion of the Order Limits lies within Thurrock's Green Belt. An assessment of the impact on the Green Belt is set out in Appendix E of the Planning Statement (Application Document 7.2), which specifically considers the potential impacts on the Green Belt in Thurrock.
	 Chapter 5: Thematic Policies Policy CSTP18 Green Infrastructure 	Within the Design Principles (Application Document 7.5), the Project-wide design principles and area-specific design principles that help address the local policies related to managing and

Strategy/plan	Relevant planning policy/ guidance	Project response
Strategy/plan		enhancing the Greengrid and green infrastructure (local policies CSSP5, CSTP18, CSTP20 and CSTP24) comprise: • LSP.06 design that maximises the Project's legacy including enhanced access, amenities and green infrastructure; • LSP.07 respecting historic landscape views, land use and pattern; • S9.02 Tilbury Fields, a new publicly accessible sculptural landscape; • S9.17 diversion of FP200 through replacement common land; • S9.19 upgrading of Two Forts Way; • S9.20 new permissive paths between heritage assets; • S10.03 Landscape integration of new Hoford Road green bridge; • S10.09 a new bridleway connection and other pedestrian access improvements; • S11.06 vegetation within Ron Evans Memorial Community Field (Blackshots Nature Reserve) retained where practicable; • S11.13 Stifford Clays Road shared
		walking/cycle track improvements;S12.09 Mardyke River Link trail
		enhancements; andS12.15 Mardyke Trail Interpretation
		within common land. Area-specific design principles also include improvements to the local WCH network along the existing Mardyke trail, WCH improvements along North Road and over North Road green bridge (S12.09 Mardyke River Link trail enhancements, S12.15 Mardyke Trail Interpretation within common land, and S12.13 Landscape integration of the North Road green bridge). The Project-wide design principles and area-specific design principles that help address the local policies related to restoring, protecting, managing and enhancing the character of Thurrock, its green assets or creating new green

Strategy/plan	Relevant planning policy/ guidance	Project response
		assets, and promoting high quality design (local policies CSTP22 and CSTP23) comprise:
		 LSP.01 Retention of existing vegetation;
		 LSP.02 planting strategy of species selection and planting pattern to fit with landscape context;
		 LSP.03 grading of earthworks to respect local landscape character;
		 LSP.04 planting strategy to integrate the road into the adjacent landscape;
		 LSP.05 landscape reinstatement to its original use;
		 LSP.07 respecting historic landscape views, land use and pattern;
		 LSP.09 false cutting design appropriate to surrounding landscape character;
		 LSP.14 boundary hedgerow planting in keeping with existing landscape character;
		 LSP.17 naturalistic attenuation pond design in keeping with wider setting;
		 LSP.20 Wildflower seeding on earthworks;
		 S9.02 creation of a new public ecology park within the new Tilbury Fields;
		 S9.10 naturalistic design of the Tilbury Main watercourses;
		 S9.11 strengthening of the wooded ridgeline of the Chadwell escarpment;
		 S9.16 Tilbury Viaduct design to be sympathetic to maintaining views and landscape integration;
		 S10.03 Landscape integration of Hoford Road green bridge;
		 S10.07 minimising impacts and providing new planting within Rainbow Shaw local wildlife site;
		 S11.07 new planting along Hornsby Lane;
		S12.01 sensitive design within the Mardyke valley landscape;

Strategy/plan	Relevant planning policy/ guidance	Project response
		S12.02 woodland planting within fenland;
		 S12.03 sensitive design of the Mardyke and Orsett Fen Viaducts;
		 S12.06 Mardyke wetland habitat creation and viaduct integration;
		S12.07 Mardyke and other watercourse enhancements;
		 S12.10 linear woodland planting north of Mardyke valley adjacent landfill site;
		S12.12 sensitive design within The Wilderness; and
		 S12.13 Landscape integration of North Road green bridge.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project.
Thurrock Design Guide: Design Strategy (Thurrock Council, 2017)	Designing in Context Site Appraisal A. Understanding the Place B. Working with Site Features	Within the Design Principles (Application Document 7.5), the Project-wide design principles and area-specific design principles that help address the key design considerations related to sensitive and good quality design that recognises and enhances the landscape character of Thurrock and its green infrastructure are as described above for the Thurrock Core Strategy and Policies for Management of Development (Thurrock Council, 2015).
London Borough of	Havering	
Havering Local Plan 2016-2031 (London Borough of Havering, 2021)	 Policy 12 Healthy Communities Policy 27 Landscaping Policy 29 Green Infrastructure 	Within the Design Principles (Application Document 7.5), the Project-wide design principles and area-specific principles (Section 13 & 14 – M25 junctions) that help address the policies related to good design, a high quality landscape scheme and retaining and enhancing the existing landscape character (local policies 12 and 27) comprise: LSP.01 Retention of existing vegetation; LSP.02 planting strategy of species selection and planting pattern to fit
		with landscape context; LSP.03 grading of earthworks to respect local landscape character;

Strategy/plan	Relevant planning policy/ guidance	Project response
		 LSP.04 planting strategy to integrate the road into the adjacent landscape;
		 LSP.05 landscape reinstatement to its original use;
		 LSP.07 respecting historic landscape views, land use and pattern;
		 LSP.09 false cutting design appropriate to surrounding landscape character;
		 LSP.14 boundary hedgerow planting in keeping with existing landscape character;
		 LSP.17 naturalistic attenuation pond design in keeping with wider setting;
		 LSP.20 Wildflower seeding on earthworks;
		 S14.01 woodland planting at the Project junction with the M25;
		 S14.03 Planting at Thames Chase Community Forest;
		 S14.07 Planting north of Ockendon Road;
		 S14.04 Thames Chase Community Forest bridge; and
		 S14.12 Open space and woodland compensation.
		With regard to policy 27, the oLEMP (Application Document 6.7) contains details of the future maintenance and management of the Project.
		With regard to policy 29, the Project-wide design principles and area-specific principles (Section 13 & 14 – M25 junctions) that relate to protecting and enhancing green infrastructure (including the Thames Chase Community Forest and Land of the Fanns Landscape Partnership) comprise:
		 LSP.04 planting strategy to integrate the road into the adjacent landscape;
		 LSP.06 design that maximises the Project's legacy including enhanced access, amenities and green infrastructure;
		 S14.03 Planting at Thames Chase Community Forest;

Strategy/plan	Relevant planning policy/ guidance	Project response
		S14.04 Thames Chase Community Forest bridge; and
		 S14.12 Open space and woodland compensation.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project.
Brentwood Borough	n Council	
Brentwood Local Plan 2016-2033 (Brentwood Borough Council, 2022)	 Strategic Policy MG02: Green Belt Policy NE02: Green and Blue Infrastructure Policy NE03: Trees, Woodlands, Hedgerows Policy NE04: Thames Chase Community Forest 	A proportion of the Order Limits lies within Brentwood's Green Belt. An assessment of the impact on the Green Belt (Strategic Policy MG02) is set out in Appendix E of the Planning Statement (Application Document 7.2), which specifically considers the potential impacts on the Green Belt in Brentwood. Within the Design Principles (Application Document 7.5), the Project-wide design principles and area-specific principles (Section 13 & 14 – M25 junctions) that help address the policy related to ancient woodland compensation and retention of all other trees, woodland and hedgerows (Policy NE03) comprise: LSP.01 Retention of existing vegetation; LSP.10 Junction planting; LSP.19 Ancient woodland compensation; S14.01 woodland planting at the Project junction with the M25; S14.02 woodland planting to field boundaries (between FP151 and the B186); S14.03 Planting at Thames Chase Community Forest; and S14.12 Open space and woodland compensation. The Project design has avoided the loss of ancient woodland as far as reasonably practicable. In addition, there are essential mitigation measures proposed during construction in Table 7.18 of Chapter 7: Landscape and Visual (Application Document 6.1) to ensure the protection of retained trees.

Strategy/plan	Relevant planning policy/ guidance	Project response
		The loss of irreplaceable habitats has been considered as part of the planning balance between the need for and benefits of the Project and the adverse effects of the Project. This is discussed in Need for the Project (Application Document 7.1) and in Chapter 7 of the Planning Statement (Application Document 7.2).
		Compensation measures proposed for the loss of irreplaceable habitats are discussed in the Design Principles (Application Document 7.5), specifically in LSP.19 Ancient woodland compensation. Ancient woodland compensation planting is illustrated on Figure 2.4: Environmental Masterplan (Application Document 6.2). With regard to policy NE02, the Project-
		wide design principles and area-specific principles (Section 13 & 14 – M25 junctions) that relate to protecting and enhancing green infrastructure, comprise:
		 LSP.04 planting strategy to integrate the road into the adjacent landscape;
		 LSP.06 design that maximises the Project's legacy including enhanced access, amenities and green infrastructure;
		 S14.03 Planting at Thames Chase Community Forest;
		S14.04 Thames Chase Community Forest bridge; and
		S14.12 Open space and woodland compensation.
		The Project passes through Thames Chase Community Forest. The planning implications of this are considered in Appendix D of the Planning Statement (Application Document 7.2).
		Within the Design Principles (Application Document 7.5), the area-specific design principles (Section 13 & 14 – M25 junctions) that help address development proposals within the Thames Chase Community Forest by supporting recreation and wildlife, comprise:
		 S14.03 Planting at Thames Chase Community Forest,

Strategy/plan	Relevant planning policy/ guidance	Project response
		 S14.04 Thames Chase Community Forest bridge; and
		 S14.06 Earthworks within Thames Chase Community Forest.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project.

Table 1.4 Landscape local policies and guidance documents relevant to the Kent Downs AONB

Strategy/plan	Relevant planning policy/guidance	Project response
Kent Downs AONB	Unit and Kent Downs AONB J	oint Advisory Committee
Kent Downs AONB Kent Downs AONB Management Plan 2021-2026 (Kent Downs AONB Unit, 2021)		The Project would fall partially within the north-western extent of the Kent Downs AONB to the west of the River Medway, with a nitrogen deposition compensation site located within the Kent Downs AONB south of Chatham. Within the Design Principles (Application Document 7.5), the Project-wide design principles and area-specific principles (Section 1 – A2/M2 Corridor) that help address the principles relating to protecting, conserving and enhancing the distinctiveness, character, key views and qualities of the Kent Downs AONB (principles SD2, SD3, SD7, SD8, SD9, SD10, SD11, SD12, SD13, LLC1 and LLC2) comprise: LSP.01 Retention of existing vegetation; LSP.02 planting strategy of species selection and planting pattern to fit with landscape context; LSP.06 design that maximises the Project's legacy including enhanced access, amenities and green infrastructure;
		LSP.07 respecting historic landscape views, land use and pattern;
		 LSP.19 Ancient woodland compensation, to achieve most ecologically beneficial woodland habitat;

Strategy/plan	Relevant planning policy/guidance	Project response
		 LSP.20 Wildflower seeding on earthworks;
		 LSP.21 naturalistic blending and integration of earthworks;
		 S1.01 Woodland north of the A2/M2 Corridor, within the Kent Downs AONB;
		 S1.02 Planting to the south of the A2/M2 Corridor, to screen views from the AONB;
		 S1.04 new green bridges at Brewers Road and Thong Lane over A2/M2 corridor;
		 S1.06 reflecting surrounding landscape character of the Kent Downs AONB;
		 S1.07 Planting palette within the AONB and its setting;
		 S1.08 New woodland east of Shorne Woods Country Park; and
		 S1.16 Landforms around the Project (Cobham Hall setting).
		The Project-wide design principles and area-specific principles (Section 1 – A2/M2 Corridor) that help address the principles relating to retaining, connecting and extending woodland within the Kent Downs AONB (principle WT1) comprise:
		 LSP.01 Retention of existing vegetation;
		 LSP.02 planting strategy of species selection and planting pattern to fit with landscape context;
		 LSP.19 Ancient woodland compensation, to achieve most ecologically beneficial woodland habitat;
		 LSP.21 naturalistic blending and integration of earthworks;
		 S1.01 Woodland north of the A2/M2 Corridor, within the Kent Downs AONB;
		 S1.02 Planting to the south of the A2/M2 Corridor, to screen views from the AONB;

Strategy/plan	Relevant planning policy/guidance	Project response
		 S1.04 new green bridges at Brewers Road and Thong Lane over A2/M2 corridor;
		 S1.06 planting design to reflect surrounding landscape character of the Kent Downs AONB;
		 S1.07 Planting palette within the AONB and its setting; and
		 S1.08 New woodland east of Shorne Woods Country Park.
		The Project-wide design principles and area-specific principles (Section 1 – A2/M2 Corridor) that help address the principles relating to high standards of design sympathetic to cultural heritage within the Kent Downs AONB (principle HCH6) comprise:
		 LSP.07 respecting historic landscape views, land use and pattern; and
		 S1.16 Landforms around the Project (Cobham Hall setting).
		The Project-wide design principles and area-specific principles (Section 1 – A2/M2 Corridor) that help address the principles relating to preserving and enhancing local character and distinctiveness for recreation access and amenity within the Kent Downs AONB (principles AEU13 and AEU14) include LSP.02, LSP.04, LSP.06, LSP.10, LSP.13 and LSP.14 that discuss landscape mitigation measures that would contribute to amenity; and design principles PEO.01 to PEO.11 that discuss provision and/or enhancement to WCH networks.
		Figure 2.4: Environmental Masterplan (Application Document 6.2) shows the embedded environmental mitigation measures for the Project.
Kent Downs AONB Setting Position Statement (Kent Downs AONB Joint Advisory Committee, 2020)	The position statement is produced as an advisory document, intended to provide further guidance on issues of setting for local planning authorities, landowners, and other interested parties. The statement focuses on ensuring avoidance of harm and the conservation and	Chapter 7: Landscape and Visual (Application Document 6.1) and Appendix 7.9: Schedule of Landscape Effects (Application Document 6.3) assess the potential effects on the landscape character and visual amenity of the setting of the Kent Downs AONB, as well as considering the indirect landscape effects of the Project beyond the AONB boundary on the landscape character and visual amenity of the Kent Downs AONB.

Strategy/plan	Relevant planning policy/guidance	Project response
	enhancement of the setting of the AONB, through good design and the incorporation of appropriate mitigation measures. The Kent Downs AONB attaches great importance to the setting of the AONB which is relevant to the Project and its study area. Further information on setting is provided in Section 7.4 of Chapter 7: Landscape and Visual (Application Document 6.1) and in Appendix 7.6: Kent Downs AONB Relevant Guidance (Application Document 6.3).	 Within the Design Principles (Application Document 7.5), the area-specific principles (Section 1 – A2/M2 Corridor and Section 2 and Section 2 – M2/A2/Lower Thames Crossing junction) that help address design considerations regarding the setting of the Kent Downs AONB, comprise: S1.06 reflecting surrounding landscape character of the Kent Downs AONB; S1.07 Planting palette within the AONB and its setting; S2.01 Wooded circle around Thong (retaining the open rural setting); S2.03 Woodland planting around slip roads (M2/A2/Lower Thames Crossing junction); and S2.09 Planting adjacent to Thong Lane.
Kent Downs AONB: Guidance on the selection and use of colour in development (Kent Downs AONB Unit, 2019)	The guidance notes that 'Colour plays a significant part in the creation of landscape character, local identity and natural beauty. The [landscape character] elements referenced above bring with them their own inherent palettes, which contribute to the distinctive qualities of this AONB. It is vital therefore that due regard is given to colour and materials in managing change within the AONB, if some of this distinctiveness is not to be lost.' The guidance offers colour guidance in two forms: the colourways and the developed palette. The existing palettes present information on the range of colours against which new development may be viewed. Based on these, the guide presents developed palettes which contain a range of related colours which will	The development of the Project design has had regard to DMRB GG 103 (Highways England, 2019) in terms of 'protecting, managing and enhancing the environment', as well as DMRB LD 117 (Highways England, 2020a) in terms of 'incorporating a sense of place' and 'enhancing its environment'. The design principles which consider these requirements are set out in the Design Principles (Application Document 7.5). The Project-wide design principles and area-specific principles (Section 1 – A2/M2 Corridor) that help address the use of colour in development relate to the design of structures including STR.01, STR.03, STR.06 to STR.08, STR.09, STR.11 and S1.09, which require a coordinated and consistent design palette and a landscape-led design to ensure they appear as seamlessly integrated components of the landscape. In addition, landscape and area-specific design principles (Section 1 – A2/M2 Corridor) LSP.02, LSP.04, LSP.11, LSP.20, S1.06 and S1.07 seek to ensure that mitigation planting aligns with the existing landscape character, which is important for ensuring colours in the planting scheme reflect existing conditions.

Strategy/plan	Relevant planning policy/guidance	Project response
	work harmoniously with these existing colours. The colourways offer examples of how colours selected from the developed palette may be put together to achieve harmonious and interesting results when applied to building elevations. The guidance offers advice on the principles of exterior colour design by highlighting a series of issues which should be considered when detailing a development. Details of relevant published AONB guidance are included in Appendix 7.6: Kent Downs AONB Relevant Guidance (Application Document 6.3).	
Kent Downs AONB Landscape Design Handbook (Kent Downs AONB Joint Advisory Committee, 2004)	The Kent Downs AONB Landscape Design Handbook provides practical, readily accessible design guidance to contribute to the conservation and enhancement of the special characteristics of the AONB as a whole, and the distinctiveness of its individual character areas. It recognises the pressures from traffic, noise and light pollution, and provides a sound framework and information basis from which sympathetic design and management can be developed. Details of relevant published AONB guidance are included in Appendix 7.6: Kent Downs AONB Relevant Guidance (Application Document 6.3).	The development of the Project design has had regard to DMRB GG 103 (Highways England, 2019) in terms of 'protecting, managing and enhancing the environment', as well as DMRB LD 117 (Highways England, 2020a) in terms of 'incorporating a sense of place' and 'enhancing its environment'. The design principles which consider these requirements are set out in the Design Principles (Application Document 7.5) and Section 1 within the area-specific design principles discusses the A2/M2 corridor within the Kent Downs AONB. Key design considerations relating to the AONB include the incorporation of green bridges at Brewers Road and Thong Lane (design principles STR.01, STR.03, STR.06 to STR.08 and S1.04), consideration of materials used for structures (design principles S1.09, STR.09 and STR.11), and provision of a suitable planting palette to reflect the local landscape character (design principles LSP.02, LSP.04, LSP.11, S1.06 and S1.07). Figure 2.4: Environmental Masterplan (Application Document 6.2) has been prepared to show the embedded environmental mitigation measures of the

Strategy/plan	Relevant planning policy/guidance	Project response
Kent Downs AONB Rural Streets and Lanes: A Design Handbook (Kent Downs AONB Unit, 2009)	•	Project, including those along the A2/M2 corridor within the Kent Downs AONB. As part of the iterative design process, National Highways has consulted with the AONB Unit regarding the design of the Project. Consultation undertaken is detailed in the Consultation Report (Application Document 5.1). There are few rural streets and lanes affected by the Project and those that are cross or run parallel to the M2/A2 corridor (Park Pale, Brewers Road and Thong Lane). The development of the Project design has considered DMRB GG 103 (Highways England, 2019) in terms of 'protecting, managing and enhancing the environment', as well as DMRB LD 117 (Highways England, 2020a) in terms of 'incorporating a sense of place' and 'enhancing its environment'. The design principles which consider these requirements are set out in the Design Principles (Application Document 7.5) and Section 1 within the area-specific design
	and interventions. Details of relevant published AONB guidance are included in Appendix 7.6: Kent Downs AONB Relevant Guidance (Application Document 6.3).	principles discusses the A2/M2 corridor within the Kent Downs AONB. The key design consideration for the rural streets and lanes has been the incorporation of green bridges crossing the Project route (design principles STR.01, STR.03, STR.06 to STR.08 and S1.04). In addition, there are overarching design principles to reduce visual clutter along roads (PLA.02, STR.09 and LST.01), as well as the provision of a suitable planting palette to reflect the local landscape character (design principles LSP.02, LSP.04, LSP.11, S1.06 and S1.07).

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