

National Grid Cable Tunnel Replacement Project

Environmental Statement Volume VI

Appendix 4.2: EIA Screening Opinion Project Responses

December 2023



Quality information

Prepared by		Checked by		Verified by		Approved by
HW – Senior EIA Consultant		HT – Principal EIA Consultant		DR – EIA Technical Director		DR – EIA Technical Director

Prepared for:

National Grid Electricity Transmission

Prepared by:

AECOM Limited
Aldgate Tower, 2 Leman Street
London, E1 8FA
United Kingdom

T: +44 20 7061 7000
aecom.com

© 2023 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) for sole use of our client (the “Client”) in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Table of Contents

1	Responses to EIA Screening Opinion.....	1
1.1	Introduction	1
1.2	Gravesham Borough Council EIA Screening Opinion Response	2
1.3	Thurrock Council EIA Screening Opinion.....	22
1.4	Marine Management Organisation (MMO) EIA Screening response	27

Tables

Table 1: Gravesham Borough Council EIA Screening Opinion Response.....	2
Table 2: Thurrock Council EIA Screening Opinion Response.....	22
Table 3: MMO EIA Screening Opinion Response	27

1 Responses to EIA Screening Opinion

1.1 Introduction

- 1.1.1 In June 2023, an Environmental Impact Assessment (EIA) Screening Opinion request, accompanied by a detailed Environmental Screening Report, was produced by AECOM and submitted to Thurrock Council and Gravesham Borough Council by National Grid (hereafter referred to as the Applicant) regarding the Tilbury to Grain and Tilbury to Kingsnorth (TKRE) Cable Tunnel Replacement Project (hereafter referred to as the Proposed Development).
- 1.1.2 On 7 July 2023, Thurrock Council confirmed through their screening opinion that they **did not** consider the Proposed Development 'EIA development'.
- 1.1.3 On 3 August 2023, Gravesham Borough Council confirmed through their screening opinion that they **did** consider the Proposed Development 'EIA development'.
- 1.1.4 Due to the opposing views of Thurrock Council and Gravesham Borough Council, the Applicant decided to consider the whole project as 'EIA development' and an Environmental Impact Assessment has been undertaken. An Environmental Statement (ES) has been produced and accompanies the Planning Applications to Thurrock Council and Gravesham Borough Council.
- 1.1.5 Although a formal Scoping Report was not produced, additional scoping meetings were held during August and September 2023 to ensure that the scope of the EIA was robust and proportionate and sufficient to inform decision makers of the proposed development's potential environmental effects and whether these may be significant or not.
- 1.1.6 This appendix provides a comment-by-comment copy of the EIA Screening Opinion provided by Gravesham Borough Council and Thurrock Council.
- 1.1.7 The response from Thurrock Council determined that EIA was not required and therefore, the level of detail contained within their response is proportionate to their decision.
- 1.1.8 Gravesham Borough Council's response included key aspects of the feedback received from the consultation undertaken with stakeholders as part of their EIA Screening Opinion. For completeness, the individual responses provided by consultees has also been included in this appendix and therefore there may be some duplication between the responses provided by consultees and the points summarised within the formal response from Gravesham Council.
- 1.1.9 It should also be noted that an EIA Screening Opinion was sought from the Marine Management Organisation (MMO). However, the MMO confirmed the Proposed Development does not fall under Schedule A1 or A2 of the Marine Works (Environmental Impact Assessment) Regulations 2007. Subsequently, the EIA Screening Opinion request from the MMO was withdrawn.
- 1.1.10 Although works to overhead lines and pylons are consented via the Electricity Act 1989, it was not deemed necessary to submit a EIA Screening opinion request under The Electricity Works (Environmental Impact Assessment) (England and Wales) Regulations 2017 as the project does not fall under Schedule 1, and Schedule 2 is for development requiring screening if no EIA report is provided. This project is providing an EIA report by virtue of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that includes consideration of the proposed modifications to the overhead line.
- 1.1.11 Table 1 provides the Applicant's responses to comments made by Gravesham Borough Council, Table 2 provides the Applicants responses to comments made by Thurrock Council and Table 3, the MMO's response to EIA screening.

1.2 Gravesham Borough Council EIA Screening Opinion Response

Table 1: Gravesham Borough Council EIA Screening Opinion Response

ID / Ref	Gravesham Borough Council Comment	Applicants Response
Gravesham Borough Council Environmental Protection	The EIA screening opinion has been reviewed with regards to the chapters that fall within the remit of Environmental Protection namely, noise and vibration, air quality and geology and hydrology covering contaminated land) and the impact on the Gravesham Borough Council area:	Noted, comments from Gravesham Borough Council relating to specific environmental topics are responded to below.
Noise and vibration	It is anticipated that there will be an impact from noise and vibration during both the construction and operational phases unless appropriate mitigation measures are put in place. Sensitive receptors (daytime use only) are located close to the development site to the west with residential being much further away to the southeast, so not impacted as such. This will be set out in greater detail in the Environmental Report which will accompany the planning application with appropriate mitigation any impact will be minimised and not significant. This approach is acceptable.	The Applicant acknowledges that Gravesham Borough Council consider the approach for assessing effects in regard to noise and vibration to be acceptable. Potential effects arising from construction and operational noise and vibration is assessed within ES Volume IV Chapter 19: Noise and Vibration - Gravesend and ES Volume III Chapter 11: Noise and Vibration - Tilbury.
Air Quality	There are likely to be dust emissions during the construction phase which will impact on human health, local amenity, and also ecological receptors. Mitigation will be needed and guidance from the Institute of Air Quality Management (IAQM) has been referred to. There is unlikely to be any impact on air quality during the operational phase. The construction phase impacts relating to dust can be addressed by a suitably detailed Construction Environmental Management Plan CEMP) which can be submitted with the full planning application (or placed as a condition on planning permission should it be granted). It is not considered that any further work on air quality impact per se is required.	The Applicant acknowledges that Gravesham Borough Council consider the approach for assessing effects in regard to air quality to be acceptable and that no further work on air quality impact is required. Potential effects arising from construction air quality are assessed within ES Volume IV, Chapter 20: Air Quality - Gravesend and Volume III, Chapter 12: Air Quality - Tilbury.
Geology and Hydrology	This section covers potentially contaminated land. There is the potential for contaminative uses to have been present in the area of the Gravesend site and as such further investigation is required. A	The Applicant acknowledges that Gravesham Borough Council consider the approach for updated Phase 1 Desk

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	staged approach to the investigation is proposed in section 3.8.21 (including an updated Phase 1 Desk Top Study with a risk assessment and conceptual site model). This is acceptable and in line with our usual requirements. The screening assessment advises that once the Phase 1 study is updated, it's likely that mitigation can be addressed via the CEMP.	Top Study with a risk assessment and conceptual site model is acceptable. The Phase 1 Preliminary Risk Assessment (referred to as the Stage 1, Tier 1 Preliminary Risk Assessment) has been submitted with the planning applications to both Thurrock Council and Gravesham Borough Council. The Outline Construction Environmental Management Plan (CEMP) has been produced and is contained within ES Volume VI, Appendix 3.1: Outline CEMP.
Gravesham Borough Council Highways	Fortunately, this proposal has most of the work being conducted from the Tilbury side of the river, with the spoil from one shaft and the tunnel being removed via the north portal. Similarly, materials for construction of the shaft and tunnel will arrive from the north as will the Tunnel Boring Machine.	Comment noted. Further details of the Proposed Development construction methodology and operation of the Proposed Development once constructed are contained within ES Volume II, Chapter 3: Project Description.
Gravesham Borough Council Highways	The only traffic generation in Gravesend will be in the construction of the southern shaft and the necessary buildings and pylons to receive the cables and connect to the overhead wire system in Gravesend. Plus, the removal of the Tunnel Boring Machine. This level of traffic would not be considered significant, but could involve some abnormal loads which will require careful management.	Comment noted. An Outline Construction Traffic Management Plan has been produced and considers movements of abnormal loads, this is contained within ES Volume VI, Appendix 10.1: Outline CTMP. The impacts associated with the construction phase traffic have been assessed within ES Volume IV Chapter 18: Traffic and Transport - Gravesend and ES Volume III Chapter 10: Traffic and Transport - Tilbury.
Gravesham Borough Council Highways	Given the anticipated time of construction, there could be conflict with the redevelopment at the Canal Basin and Albion Waterside. (Application 20210270), as well as the Lower Thames Crossing and the applicant will need to carefully manage the development and its deliveries and waste removal to minimise any adverse impacts that may be caused by delays outside his control.	Both the Canal Basin and Albion Waterside development and Lower Thames Crossing development have been considered within the cumulative developments scoped into the assessment contained inherently within ES Volume IV, Chapter 18: Traffic and Transport - Gravesend and are therefore assessed in combination with the effects for the Proposed Development. In addition to the potential cumulative traffic impacts, both developments have also been considered within the

ID / Ref	Gravesham Borough Council Comment	Applicants Response
		cumulative effects assessment contained within ES Volume V Chapter 23: Cumulative Effects Assessment which assesses potential cumulative impacts associated with other development.
Gravesham Borough Council Highways	It would be desirable that no HGV movements should take place during school arrival and leaving times at Chantry Community Academy due to the age of the children, and parental parking.	The Outline CTMP (ES Volume VI Appendix 10.1) contains measures designed to manage construction traffic (e.g. HGVs and construction staff movements at the start and end of the working day) in order to minimise the impact on local residents, businesses, road users and other potentially sensitive land uses and ensure all third-party traffic interfacing with the Proposed Development is kept safe from the on-going work.
External: Kent County Council Biodiversity	We have reviewed the submitted information in regard to determining if an environmental impact assessment (EIA) will need to be carried out and advise there are likely to be significant impacts Therefore, an EIA for ecology is required.	Comment noted. An Ecological Impact Assessment has been produced and is contained within ES Volume IV Chapter 15: Biodiversity - Gravesend and Volume III Chapter 7: Biodiversity - Tilbury.
External: Kent County Council Biodiversity - Schedule 1	Under the Town and Country Planning (EIA) Regulations 2017, developments falling within Schedule 1 always require an EIA and are referred to as 'Schedule 1' developments	Noted.
External: Kent County Council Biodiversity - EIA Screening	If the development falls within the selection criteria for a 'schedule 2' development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, then it needs to be determined whether the proposal is situated within a 'sensitive area' and/or whether it is likely to have significant effects on the environment. Sensitive areas (as identified under Section 2(1), include the following ecologically designated sites: Site of Special Scientific Interest (SSSI), European Sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar Sites)). If the proposed development is located in, partly in, or has the potential to have any negative effect on these sites, then an assessment will be required. The regulations also include World Heritage Sites, schedule monuments, Areas of Outstanding Natural	Noted.

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	Beauty (AONB) and National Parks, which are not dealt with in these comments.	
External: Kent County Council - EIA Screening	The site is within 50m of the Thames Estuary & Marshes Ramsar Site and SPA and the submitted information has detailed that the nearby foreshore habitat is potentially suitable to support the species for which the Thames Estuary and Marshes Ramsar and SPA are designated. Grassland habitat adjacent to the site provides suitable habitat for notable overwintering bird species. Therefore, the proposal may have an adverse impact on the SPA and Ramsar site.	The Applicant acknowledges and notes the concern raised by Kent County Council regarding the potential adverse impact on the Thames Estuary & Marshes SPA and Ramsar site. The impacts to internationally designated sites are assessed within ES Volume IV Chapter 15: Biodiversity - Gravesend and Volume III Chapter 7: Biodiversity - Tilbury, which concludes no significant effects on Thames Estuary & Marshes SPA/Ramsar site. The Report to Inform the Habitat Regulations Assessment included with the Planning Application concludes that no likely significant effects will occur on the Thames Estuary & Marshes SPA/Ramsar site.
External: Kent County Council Biodiversity - EIA Screening	To consider if the development will have significant effect on the environment, we have considered the selection criteria under 'Schedule 3' (EIA Regulations 2017). The site is within Canal and Grazing Marsh, Higham LWS and there is suitable habitat within adjacent to the site for breeding birds, reptiles, water voles, otter, GCN and foraging/commuting/roosting bats. Due to the fact that the site is within a LWS and the impact on species likely to be present we advise that a significant impact on the environment cannot be ruled out.	The Applicant acknowledges this conclusion from Kent County Council that significant effects cannot be ruled out for the Canal and Grazing Marsh, Higham LWS, breeding birds, reptiles, water voles, otter, GCN and foraging/commuting/roosting bats at this stage. An ecological impact assessment has been undertaken within Volume IV Chapter 15: Biodiversity - Gravesend which concludes no significant effects on the structure/function of the Canal and Grazing Marsh, Higham, LWS. Equally, the assessment concludes there would be no significant effects on breeding birds, reptiles, water voles or bats. Note that no waterbodies within 500m of the Gravesend site were found to support GCN during surveys in support of the Lower Thames Crossing. Additionally, waterbodies identified for survey were sampled and returned negative eDNA results for GCN. GCN is absent from the Gravesend site. There are no recent records of otter activity in the vicinity of the Gravesend Site, and no evidence indicating presence of otter was identified during the surveys.
External: Kent County Council	Based on the above conclusions we advise that for this development an EIA for Ecology is required.	Comment noted. Following the Gravesham Borough Council Screening opinion an ecological impact assessment has been

ID / Ref	Gravesham Borough Council Comment	Applicants Response
Biodiversity - EIA Screening		produced, refer to ES Volume IV Chapter 15: Biodiversity – Gravesend.
External: Kent County Council Flood and Water Management	The LLFA understand that the proposed Tunnel Headhouse and SEC at the Gravesend site would have a gross impermeable area of 5000m2. This will therefore have the potential to greatly increase surface water runoff compared to the existing greenfield scenario. Statement 3.9.15 within the report highlights that a drainage scheme will be developed to serve this area and a subsequent Drainage Strategy report compiled. The LLFA acknowledge this approach and should ensure that surface water runoff (post construction) is appropriately considered.	The Applicant acknowledges that Kent County Council Flood and Water (LLFA) acknowledge the proposed approach. It should be noted that the surface water drainage design strategy has since evolved, and the majority of surfacing will comprise free draining stone material with a Type 3 sub-base, meaning surface water will soak away naturally, with only the internal roads requiring to be tarmacked and therefore impermeable. ES Volume IV Chapter 21: Water Environment - Gravesend and ES Volume III Chapter 13: Water Environment - Tilbury assesses the impact to surface water quality, hydromorphology, groundwater and flood risk.
External: Kent County Council Flood and Water Management	With the increase of impermeable areas and the nature of the site post construction, there is the concern around water quality to the receiving watercourses. It is noted in statement 3.9.32 that SuDS or proprietary treatment features will be incorporated into the future drainage scheme serving the site. The LLFA would request that the measures employed to treat water is clearly demonstrated within the future drainage strategy report.	ES Volume IV Chapter 21: Water Environment- Gravesend assesses the impact to water quality of watercourses within the study area and provides details of appropriate mitigation to manage and reduce any impacts. The planning application is also supported by an Outline Drainage Management Plan (Document Reference Document Reference 30003364-BHK-XX-XX-RP-C-02060).
External: Kent County Council - Heritage	The site lies within an area of multi-period archaeological potential adjacent to the Thames. The site is underlain by alluvial deposits which have the potential to contain, or overlie, nationally important, waterlogged archaeological remains from the late glacial to the post-medieval period. The site also includes the western end of the non-designated 19th century Milton Rifle Range. The range consists of a succession of low earthen mound firing points, a target mound and markers' gallery, as well as a weather shelter. The butts were modified in the 1890s and perhaps afterwards and part of the range is still in use today. The range saw continuous use and was used intensively for rifle practice during the First and Second World Wars and mortar firing	The Applicant acknowledges and notes the information provided.

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	practice was also carried out. Although the formation of the Metropolitan Police Training Facility has involved some further modifications to the southern end of the butts and to some of the firing points, there are substantial survivals of the original range structures.	
External: Kent County Council Heritage	The application for a Screening Opinion has been made with a Historic Environment Desk Based Assessment (Aecom, 2023) which usefully records the presently known heritage and archaeological data for the site and immediate surrounding area. The Historic Environment DBA recognises the important palaeoenvironmental potential, and the need for geoarchaeological field evaluation as a next step in understanding the archaeological potential of the site and to allow an appropriate assessment of the impact of the proposals. I am not in agreement, however, with statements in Section 7.2.2 of the DBA, that the site contains no non-designated heritage assets, nor that the Milton Rifle Range lies immediately east of the site boundary. In my opinion, the Milton Rifle Range should be considered as a non-designated heritage asset and the development site boundary lies within the western end of the original range, as is illustrated in the DBA figure 11.	The Applicant acknowledges that Kent County Council/ Gravesham Borough Council recognise the need as set out in the EIA Screening Report for geoarchaeological field evaluation as a next step in understanding the archaeological potential of the site and to allow an appropriate assessment of the impact of the proposals. A Written Scheme of Investigation (WSI) has been produced and agreed for Geoarchaeological Deposit Modelling and Borehole Investigation, which has been consulted on with the County Archaeologists for Essex and Kent County Council as advisers to Thurrock Council and Gravesham Borough Councils. Refer to ES Volume VI Appendix 9.3. An appropriate programme of archaeological and palaeoenvironment investigation, sampling and recording to mitigate any adverse effects of shaft construction on deeply buried peat horizons and alluvial deposits is to be developed based on the results of the archaeological/geoarchaeological investigation. ES Volume IV Chapter 17 – Historic Environment – Gravesend acknowledges that the Proposed Development is located within the western extent of Milton Rifle Range and assesses it as a non-designated heritage asset.
External: KCC Heritage	The development has the potential to impact on significant, potentially nationally important, below-ground archaeological remains, as well, potentially having a significant negative impact on the non-designated Milton Rifle Range. The project should, in my opinion, be subject to EIA and the impact assessment process should include the use of purposive field evaluation data to investigate the below-ground archaeological	Comment noted. An EIA has been produced including an ES chapter on Historic Environment contained within ES Volume IV Chapter 17: Historic Environment - Gravesend and ES Volume III Chapter 9: Historic Environment for Tilbury. A WSI for an Earthwork Survey and a Trial Trench Evaluation of the affected extent of the Milton Rifle is to be developed, the scope and specification of the mitigation would be agreed in

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	potential and a detailed assessment of the full extent of the historic rifle range and the impact of the proposed development.	consultation with the County Archaeologists for Essex and Kent County Council as advisers to Thurrock Council and Gravesham Borough Councils.
External: Kent County Council Highways	A full Transport Assessment coving the impact on the nearby local highway network should be submitted in support of any application so that it may be assessed by the Local Highway Authority.	This feedback has been considered as part of this ES, although the position with respect to the Transport Assessment has since been updated following further consultation with Kent County Council Highways. On 4 October 2023, Kent County Council Highways confirmed that in terms of the Transport Assessment, it would be acceptable to prepare a short note with any TA-specific content (where not covered elsewhere), signposting the remaining TA components (i.e. within the ES/CTMP) to minimise document crossover. Therefore, a Transport Note has been prepared on this basis, which is held in ES Volume VI Appendix 18.1.
External: Kent County Council Public Rights of Way	I can confirm that I do not have any objections to the above planning application at Eastcourt Marshes Electricity Substation. Public Right of Way Footpaths NG1 and NH2 lay to the north and south of the proposed site respectively. I enclose a copy of the Public Rights of Way network map showing the line of the paths for your information.	The Applicant acknowledges that Kent County Council PRoW do not have any objections to the Proposed Development and appreciates the copy of the Public Rights of Way Network map provided for information.
External: KCC Public Rights of Way	The granting of planning permission confers no other permission or consent on the applicant. It is therefore important to advise the applicant that no works can be undertaken on a Public Right of Way without the express consent of the Highways Authority. In cases of doubt the applicant should be advised to contact this office before commencing any works that may affect the Public Right of Way. Should any temporary closures be required to ensure public safety then this office will deal on the basis that: • The applicant pays for the administration costs. • The duration of the closure is kept to a minimum. • Alternative routes will be provided for the duration of the closure.	The Applicant acknowledges the requirements set out by Kent County Council in regard to works to PRoW. Should the need to temporary close or divert any PRoW the criteria set out within the scoping opinion response will be followed.

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	A minimum of six weeks notice is required to process any applications for temporary closures.	
External: KCC Public Rights of Way	This means that the Public Right of Way must not be stopped up, diverted, obstructed (this includes any building materials or waste generated during any of the construction phases) or the surface disturbed. There must be no encroachment on the current width, at any time now or in future and no furniture or fixtures may be erected on or across Public Rights of Way without consent.	
External: Environment Agency	We no longer respond to screening opinions and so have no comments to make.	Noted, no further comment required.
External: Natural England	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	Noted, no further comment required.
External: Natural England	It is Natural England's advice, on the basis of the material supplied with the consultation, that there are potential likely significant effects on statutorily designated nature conservation sites or landscapes and further assessment is required.	The ecological impact assessment is presented in ES Volume IV Chapter 15: Biodiversity - Gravesend and ES Volume III Chapter 7: Biodiversity - Tilbury. The landscape and visual impact assessment is presented in ES Volume IV Chapter 16: Landscape and Visual -Gravesend and ES Volume III Chapter 8: Landscape and Visual - Tilbury.
External: Natural England	Schedule 3(2) of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 requires consideration of the selection criteria for Schedule 2 EIA development and identification of 'environmental sensitivity'. The proposed development is located within/partly within or has the potential for adverse effects on the following designated nature conservation sites or designated landscapes: South Thames Estuary & Marshes Site of Special Scientific Interest (SSSI)	Refer to ES Volume IV Chapter 15: Biodiversity - Gravesend and ES Volume III Chapter 7: Biodiversity - Tilbury which conclude no significant effects on these designated sites. The Report to Inform the Habitat Regulations Assessment (HRA) included with the Planning Application concludes that no likely significant effects will occur on the Thames Estuary & Marshes SPA/Ramsar site.

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	• Mucking Flats & Marshes Site of Special Scientific Interest (SSSI) • Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI) • North Kent Marshes Functional Land • North Downs Woodlands Special Area of Conservation (SAC), • Thames Estuary & Marshes Special Protection Area (SPA) • Thames Estuary & Marshes Ramsar Site	
External: Natural England	Methodology (provided within our overarching advice letter). Without this information Natural England will not be in a position to comment on the significance of the impacts. For large scale developments, Natural England may provide advice on a cost recovery basis through our Discretionary advice service.	Comment noted, no further response required.
External: Natural England	All queries in relation to the application of this methodology to specific applications or development of strategic solutions will be treated as pre-application advice and therefore subject to chargeable services.	Comment noted, no further response required.
External: Natural England	Natural England has not assessed the significance of any impacts on these designated sites or landscapes. The proposed development may therefore be likely to have significant effects on the interest features for which these sites are notified or the purposes of designation and we advise you to consider further whether an Environmental Impact Assessment (EIA) is required.	An EIA has been produced scoping in a variety of environmental topics including biodiversity and landscape and visual. Further details are provided in ES Volume II, Chapter 4: Environmental Impact Assessment Methodology of this ES. The ecological impact assessment is contained within ES Volume IV Chapter 15: Biodiversity - Gravesend and ES Volume III Chapter 7: Biodiversity - Tilbury. The landscape and visual impact assessment is contained within ES Volume IV Chapter 16: Landscape and Visual - Gravesend and ES Volume III Chapter 8: Landscape and Visual – Tilbury.
External: Natural England	Should you decide that an EIA is not required, Natural England advises that sufficient information on the potential impacts of this proposal upon these designated sites/areas is submitted with any subsequent planning application. We would be pleased to discuss this further with the applicant through our Discretionary Advice Service.	

ID / Ref	Gravesham Borough Council Comment	Applicants Response
External: Natural England	Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this proposal is likely to affect protected species to such an extent as to require an Environmental Impact Assessment (EIA). The developer must provide sufficient information for your authority to assess whether protected species are likely to be affected and, if so, whether appropriate avoidance, mitigation or compensation measures can be put in place. Further information is included in Natural England's standing advice on protected species.	The ecological impact assessment is presented within ES Volume IV Chapter 15: Biodiversity - Gravesend and Volume III Chapter 7: Biodiversity - Tilbury. The assessment outlines appropriate avoidance, mitigation or compensation measures required following the assessment of effects to protected species.
External: Natural England	Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. This development proposal may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land or on local landscape character that may be sufficient to warrant an EIA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.	Noted. Data has been received through consultation, desk-based assessments and field-based investigations. A series of ecological surveys have been undertaken between November 2022 and September 2023 in order to adequately establish the ecological baseline.
External: Natural England	We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the proposed development before determining whether an EIA is necessary.	
External: Natural England	Should you determine that an EIA is not required in this case, you should ensure that the application is supported by sufficient biodiversity, landscape and other environmental information in order for you to assess the weight to give these material considerations when determining the planning application. Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.	Comment noted, although the Applicant recognises that this comment is likely intended for GBC in order to determine the Scoping Opinion response and therefore no further comment is required other than to clarify that an EIA has been produced scoping in a variety of environmental topics including Biodiversity and Landscape and Visual. Further details are provided in ES Volume II Chapter 4: Environmental Impact Assessment Methodology.

ID / Ref	Gravesham Borough Council Comment	Applicants Response
External: Port of London Authority	The proposed development relates to one new shaft headhouse and one new cable sealing end compound in Gravesham as one element of the TKRE Cable Tunnel Replacement Project. The project relates to a new bored tunnel under the River Thames constructed to house new cross linked polyethylene (XLPE) cables with associated new infrastructure proposed either side of the River Thames in Tilbury and Gravesend. On the tunnel itself table 2.1 (New Bored Cable Tunnel – Summary of Key Characteristics) states that the depth of the tunnel will be approximately 50m with a width of 4m. This will unlikely affect the river channel above it. However if for any reason the proposed depth cannot be achieved or maintained then the PLA must be reconsulted to establish that the Tidal Thames remains unaffected.	Since the time of EIA screening, the design of the Proposed Development has evolved. The depth of the tunnel is now estimated to be approximately -34mAoD (above Ordnance Datum) to -32mAoD. The Applicant's consultation with the Port of London Authority has continued throughout the design phase and will continue post planning submission.
External: Port of London Authority	The potential construction effects section (paragraph 3.8.16) states that there is the potential for construction to affect human and controlled waters receptors and for the ground conditions to impact on the design of the proposed development. Potential impacts listed include possible dewatering of the tunnel or the spoil during construction, and the discharge of water from dewatering to surface watercourses. To note if any new outfall to the tidal Thames is required as part of the works a River Works Licence (RWL) will be required with the PLA and the PLA's Statutory Consents and Compliance Team should be contacted at lic.app@pla.co.uk. Further information on this will be required in the forthcoming Drainage Strategy as part of any forthcoming planning application.	Comment noted. The Applicant acknowledges the requirement for a River Works Licence (RWL) with the PLA and the requirement to contact the PLA's Statutory Consents and Compliance Team should discharge of water from dewatering to surface watercourses be required.
External: Port of London Authority	A key issue highlighted in the report is the requirement for the permanent disposal of the material/spoil removed from the tunnel during construction. Within the report it is highlighted that it is the applicant's preference that tunnel spoil will be removed by barge on the River Thames to reduce the number of HGVs on the wider road network, and that this will be reviewed further as part of the Environmental Appraisal Report (EAR). Paragraphs 2.3.12 and 3.9.29 of the report also state that some discussion has been held with the RSPB with regard to using excavated material in the formation of wetlands at RSPB Cliffe Pools to contribute to the creation of new habitat, or to support other habitat	Numerous promising local opportunities have been explored for the reuse of the spoil materials to meet the Applicant's commitment to avoid landfill. Currently, the Applicant is exploring opportunities to transport the spoil to habitat enhancement projects in the local vicinity such as the RSPB site at Cliffe Pools which would provide benefits to aquatic invertebrates and wading birds. Whichever site is chosen, the removal of the tunnel and shaft spoil at Tilbury will be via the

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	restoration and wetland projects in the Tilbury area. In principle this preference is supported. Paragraph 3.2.1 also states that it is the applicant's preference to remove the tunnel spoil from the construction site at Tilbury to and from existing jetty structures only. As part of the forthcoming planning application further detail will be required on this preference within the EAR, as well as the Transport Assessment and Construction Environmental Management Plan (CEMP) particularly with regard to maximising the use of the river as part of the construction stage, rather than by road. This should include details on any communication with operators/owners of existing river structures that may be utilised for the proposed development and any implications of barge movements on marine traffic. Furthermore it is noted in paragraph 3.7.12 that potential vessel emissions will also be considered in the forthcoming Air Quality Assessment, this is supported.	River Thames, to reduce the number of HGV required on the local and strategic road network. The Applicant will seek to utilise either: - the existing and working jetty to the south-east of the proposed Tilbury SEC, delivering the tunnel and Tilbury shaft spoil to the jetty via HGV and transferring to barge. There is an existing road extending to the jetty, however some upgrading of the existing road will be required; - Berth 5 at the Port of Tilbury, delivering the tunnel spoil to the berth via HGV and transferring to barge. No road upgrading will be required for this option. The Applicant also acknowledges the support for vessel emissions to be considered in the Air Quality Assessment. Please refer to Section 12.14 in ES Volume III Chapter 12: Air Quality - Tilbury for further details on the air quality assessment.
External: Port of London Authority	On other environmental matters, within the noise and vibration chapter it is noted that this does not specifically consider non-human sensitive receptors. Given the location in relation to various European designated sites it is considered that this must be addressed as part of the forthcoming planning application. It is noted that there are references elsewhere in the report on noise, for example paragraph 3.2.26 on underwater sound disturbance effects to marine mammals and fish, states that based on information available at this stage the applicant considers it unlikely that the proposed activities will generate sufficient underwater sound to exceed ambient levels - however, once full design details are available the impact pathway will be subject to further assessment to confirm that this. The PLA in principle support this approach.	ES Volume III Chapter 7: Biodiversity - Tilbury and Volume VI Chapter 15: Biodiversity – Gravesend assesses the impacts of changes in noise on ecological receptors, including internationally designated sites. The chapters conclude no significant effects. The Report to Inform the Habitat Regulations Assessment (HRA) included with the Planning Application concludes that no likely significant effects will occur on the Thames Estuary & Marshes SPA/Ramsar site.
External: Port of London Authority	Table 3.1 (Key Ecological Receptors) outlines the geographical scale of biodiversity for various receptors. Within this table the following amendments are required:	

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	• Wintering and wading birds: As these are designated features of the Thames Estuary and Marshes Ramsar and Special Protection Area (SPA), it is considered that this would make them of international importance • Breeding birds: As these are designated features of the associated Site of Special Scientific importance (SSSI), it is considered that this would make them of national importance	
External: Port of London Authority	In addition to highlight that the most significant issue relating to birds is that of disturbance because of construction activities, including any potential effects of the noise and vibrations tunnelling activities on underwater feeding waterfowl and marine mammals. This must form a key consideration in the Habitats Regulations Assessment (HRA) as part of the forthcoming planning application. Furthermore to note that depending on the location, any mitigation/compensation identified in the HRA may have additional implications for the PLA.	
External: Port of London Authority	Finally paragraphs 2.3.38 – 2.3.39 include some information on the decommissioning of existing assets, stating that decommissioning of the existing tunnel and associated infrastructure does not form part of this project. However the report also states that it is expected that the existing cables and cable joints within the existing tunnel will be purged of their oil and sent for recycling and that further tunnel inspection work will be required to assess this. To confirm the PLA consider that, if the existing tunnel is no longer going to be used, the existing tunnel and infrastructure should be removed from the river bed.	The decommissioning of the existing tunnel and associated infrastructure does not form part of this project.
External: Historic England	Our primary remit would be the impact of the development upon the significance of designated assets either through physical impacts or through a development within their setting. This would be either highly graded listed buildings or scheduled monuments.	Noted, no further response required.
External: Historic England	We confirm that the report is detailed, thorough and adequate for the purposes of this assessment, and we acknowledge there are limited numbers of designated heritage assets affected. We also confirm we broadly support the assessment, the list of the key receptors, cumulative	Noted, no further response required.

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	impacts and summary of effects as set out in the Historic Environment section.	
External: Historic England	We are however mindful of the potential for non-designated heritage assets and archaeological matters within the red line boundary. Specifically, in this case it is the likelihood of archaeological and palaeo environmental remains associated with the Thames foreshore and the former marshlands.	A WSI has been produced and agreed for Geoarchaeological Deposit Modelling and Borehole Investigation, which has been consulted on with the County Archaeologists for Essex and Kent County Council as advisers to Thurrock Council and Gravesham Borough Councils. Refer to ES Volume VI Appendix 9.3. An appropriate programme of archaeological and palaeoenvironment investigation, sampling and recording to mitigate any adverse effects of shaft construction on deeply buried peat horizons and alluvial deposits is to be developed based on the results of the archaeological/geoarchaeological investigation.
External: Historic England	We note this potential has been identified in the report but in our view these deposits should be ascribed a high-value because of the potential provide information on a range of indices, specifically things like climate change, the evolution of the Thames as well as human interaction with that landscape. Although this would not change the need for further assessment and the need for an appropriate approach to mitigation, we do consider the values and assessment of impacts are amended to reflect the significance of these deposits.	
External: Historic England	Overall, we agree that the historic environment represents a potentially significant issue in EIA terms. We note the applicant has confirmed the historic environment would be fully assessed which is appropriate and which we would support.	
External: Historic England	Please note however that the setting of heritage assets is not just restricted to visual impacts and other factors would also need to be considered. Noise, light, traffic and landscape assessments for example. Cultural heritage assessment would also need to be cross-referenced against other studies and impacts recorded accordingly	ES Volume IV, Chapter 17: Historic Environment - Gravesend and ES Volume III, Chapter 9: Historic Environment – Tilbury assess the potential combined impacts relating to noise, light, traffic and visual on heritage assets. These chapters conclude with no significant effects.
External: Historic England	We strongly recommend that the applicant involve the county's specialist advisers on archaeological matters. We recognise that they are best placed to provide advice on non-designated heritage assets and to give advice on how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment. They should also be asked to advise on mitigation and on any opportunities	The Applicant and AECOM's heritage and archaeological advisers have engaged with the county archaeologists and Historic England on the WSI for Geoarchaeological Deposit Modelling and Borehole Investigation. More details on this consultation can be found in ES Volume II Chapter 5: Consultation, ES Volume III Chapter 9: Historic Environment –

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	for securing wider benefits for the future conservation and management of heritage assets.	Tilbury and ES Volume IV Chapter 17: Historic Environment – Gravesend.
External: Historic England	Likewise, the LPA's Conservation Officer will need to be consulted in relation to the Grade II listed buildings. Advice on these assets is broadly outside of the remit of Historic England.	
External: Historic England	Any assessment would also need to be carried out in accordance with established policy and guidance, including the National Policy Statements and National Planning Policy Framework, Planning Practice Guidance on heritage and we highly recommend as stated above use is made of the advice set out in GPA3 when considered the setting of heritage assets.	The Applicant has taken due regard of relevant legislation, policy and guidance, the full list is provided in ES Volume IV, Chapter 17: Historic Environment - Gravesend and ES Volume III, Chapter 9: Historic Environment - Tilbury.
External: Historic England	Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems	The heritage value of an asset (its heritage significance) is guided by its designated status but is derived also from its heritage interest, which may be archaeological, architectural, artistic or historic (National Planning Policy Framework Annex 2, Glossary). Each identified heritage asset has been assigned a heritage value using available guidance, experience on comparable schemes and professional judgement Further details are detailed in ES Volume IV, Chapter 17: Historic Environment - Gravesend and ES Volume III, Chapter 9: Historic Environment - Tilbury.
External: Historic England	Historic England therefore recommends that these should be seen as material only to support a clearly expressed and non-technical narrative argument of harm and benefit, which is set out within the cultural heritage chapter. The ES should therefore address ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.	
External: Historic England	We would also be looking for appropriate mitigation for any impacts and this could include actions that enhance the situation of any affected designate heritage assets or would provide an improved understanding of heritage matters.	Comment noted, through completing the EIA for the historic environment, mitigation measures have been identified and are detailed in ES Volume IV Chapter 17: Historic Environment – Gravesend and ES Volume III Chapter 9: Historic Environment – Tilbury. These are secured within the Outline CEMP (ES Volume VI, Appendix 3.1).

ID / Ref	Gravesham Borough Council Comment	Applicants Response
External: Historic England	<i>Recommendation:</i> We support the approach taken to compile this report and agree that the historic environment is an important consideration. We recommend it is scoped into any further assessment in order to fully address the impact on the historic environment.	Potential significant effects to the Historic environment have been assessed and reported in ES Volume IV Chapter 17: Historic Environment - Gravesend and ES Volume III, Chapter 9: Historic Environment - Tilbury of this ES.
Analysis	<i>Schedule 1</i> The proposal does not fall within Schedule 1 of the Regulations (2017) that would require mandatory Environmental Impact Assessment (EIA).	Noted.
Analysis	<i>Schedule 2</i> Schedule 2 development" as defined in the Regulations (2017) is Development of a description mentioned in Column 1 of the table in Schedule 2 1where: a. any part of that development is to be carried out in a sensitive area2; or b. any applicable threshold or criterion in the corresponding part of Column 2 of that table is respectively exceeded or met. In this case, the proposed development subject of this screening request falls most closely within Schedule 2 by reason of Part 10(b)(i) in Column 1 for 'Urban development projects' and would exceed the threshold set in column 2 as it would consist of more than 1 hectare of development (at approximately 1.1 hectares (ha)) which is not dwellinghouse development. The proposal therefore now needs to be screened to determine whether significant effects on the environment are likely and whether an EIA is required. Sensitive areas are defined in Regulation 2 of the 2011 Regulations as any of the following - (a) a site of special scientific interest (SSSI); (b) a National Park; (c) the Broads; (d) a property appearing on the World Heritage List; (e) a scheduled monument; (f) an area of outstanding natural beauty; (g) a European site within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2010.	Noted.

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	The site itself is not within a sensitive area but the screening report submitted with the application states the proximity of the following sensitive areas to the Gravesend site: • The Thames Estuary and Marshes Special Protection Area and Ramsar Site is located in close proximity to both the south and east of the site. At its closest point it is approximately 50m from an existing pylon where restringing will occur. The headhouse and main works area is approximately 100m from the SPA/Ramsar; • The foreshore areas adjoining the River Thames to the north of the Gravesend site are also considered to be suitable to support the species for which the Ramsar/SPA are designated; • The Gravesend site is located within the Canal and Grazing Marsh, Higham Local Wildlife Site (LWS) a non-statutory designated site for nature conservation. The site is designated on the basis of remnant grazing marsh habitat which has been found to support a range of notable plant species; • Other designated sites nearby include South Thames Estuary and Marshes SSSI, approximately • 500m south, Mucking Flats and Marshes SSSI, approximately 2km north-east and Tilbury Marshes LWS approximately 2km north-west; • The majority of the site consists of horse grazed semi-improved grassland with occasional scattered scrub and trees. In addition, a wet ditch directly adjoins the eastern and southern boundaries of the site. These habitats are potentially suitable to support notable plant species such as those listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006, as amended); • The habitats at the Gravesend site have suitability to support several protected species. The grassland and scrub have suitability to support foraging bats, widespread species of reptile, notable bird species, badgers, hedgehogs, eels and notable invertebrates. The ditches are potentially suitable to support great crested newt, water vole and otter; and	

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	• A single tree in close proximity to the proposed SEC was identified as having high suitability for roosting bats due to the multiple bark fissures, woodpecker holes and callous rolls in its trunk. There are invasive non-native plant species on site. In addition Natural England advise the site is within/partly within or has the potential for adverse effects on the following designated nature conservation sites or designated landscapes: • Halling to Trottiscliffe Escarpment Site of Special Scientific Interest (SSSI) • North Kent Marshes Functional Land • North Downs Woodlands Special Area of Conservation (SAC),	
Schedule 3 Screening Criteria	Schedule 3 of the Regulations (2017) sets out the selection criteria for screening which are: Characteristics of development 1. The characteristics of development must be considered with particular regard to— (a)the size and design of the whole development; (b)cumulation with other existing development and/or approved development; (c)the use of natural resources, in particular land, soil, water and biodiversity; (d)the production of waste; (e)pollution and nuisances; (f)the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge; (g)the risks to human health (for example, due to water contamination or air pollution). Location of development 2.—(1) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to— (a)the existing and approved land use; (b)the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground; (c)the absorption capacity of the natural environment,	Noted.

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	paying particular attention to the following areas— (i)wetlands, riparian areas, river mouths; (ii)coastal zones and the marine environment; (iii)mountain and forest areas; (iv)nature reserves and parks; (v)European sites and other areas classified or protected under national legislation; (vi)areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; (vii)densely populated areas; (viii)landscapes and sites of historical, cultural or archaeological significance. Types and characteristics of the potential impact 2. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account— (a)the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected); (b)the nature of the impact; (c)the transboundary nature of the impact; (d)the intensity and complexity of the impact; (e)the probability of the impact; (f)the expected onset, duration, frequency and reversibility of the impact; (g)the cumulation of the impact with the impact of other existing and/or approved development; (h)the possibility of effectively reducing the impact. To ensure this is all carefully considered, where relevant, the Government provide an Environmental impact assessment screening checklist which they state can be used when screening for EIA although there is no obligation. This has been completed and can be found in Appendix 1 of this report.	
Conclusion	Having assessed the available evidence it is the Local Planning Authority's opinion that the proposal is EIA development and that accordingly an Environmental Statement is required to accompany a planning application, please refer to the Screening Matrix in Appendix 1 for full details. Given the nature of the development, the location and sensitivity of the area and the likely potential impact outlined in respect	An EIA has been produced scoping in the following environmental topics: • Biodiversity; • Landscape and Visual;

ID / Ref	Gravesham Borough Council Comment	Applicants Response
	of biodiversity and ecology, geology and hydrology, noise and vibration, heritage and archaeology, landscape/townscape and visual effects, transport and access and cumulative impacts, it is considered that the proposal would be likely to have a significant impact on the environment. Gravesham Borough Council therefore concludes that the development is EIA development and that an EIA is therefore required.	• Historic Environment; • Traffic and Transport; • Noise and Vibration; • Air Quality; • Water Environment; • Materials and Waste; and • Cumulative Effects. It should be noted that geology and hydrogeology have been considered as part of the Stage 1, Tier 1 Preliminary Risk Assessment submitted separately to the ES in the planning applications.

1.3 Thurrock Council EIA Screening Opinion

Table 2: Thurrock Council EIA Screening Opinion Response

ID / Ref	Thurrock Council Comment	Applicants Response
Letter: Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)– Request for the Screening Opinion of the Local Planning Authority (7th July 2023)	I refer to your recent email request, dated 2nd June 2023, for a Screening Opinion pursuant to Part 2 (6) of the above regulations. You have kindly agreed to an extension of time for determination until Friday 7 July 2023 via Part 2 (6)(6)(b) of the Regulations. Having undertaken the Environmental Impact Assessment (EIA) screening assessment process (below) the local planning authority considers that the proposal would be unlikely to result in significant effects on the environment. Consequently, the local planning authority has determined as follows: That an EIA is not required. I can confirm that in accordance with the Regulations a copy of this decision will be placed on Part 1 of the Planning Register. Should you have any further queries relating to this matter please do not hesitate to contact me via the email address above.	The Applicant acknowledges the decision from Thurrock Council that an EIA would not be required for the Proposed Development. Due to the opposing views of Thurrock Council, and Gravesham Borough Council regarding if the Proposed Development constituted EIA development, the Applicant decided to consider the whole project as EIA development. An EIA has been produced scoping in the following environmental topics: • Biodiversity; • Landscape and Visual; • Historic Environment; • Traffic and Transport; • Noise and Vibration; • Air Quality; • Water Environment; • Materials and Waste; and • Cumulative Effects It should be noted that geology and hydrogeology have been considered as part of the Stage 1, Tier 1 Preliminary Risk Assessment submitted separately to the ES in the planning applications.
Determination of whether Schedule 1 or Schedule 2 Development	Your request refers to the erection of a new terminal pylon including overhead line modifications, a bored cable tunnel,	Noted, no further response required.

ID / Ref	Thurrock Council Comment	Applicants Response
	tunnel headhouse and sealing end compounds. Although the development would be located adjacent to a proposed Site of Special Scientific Interest (SSSI) boundary, no permanent development would be within this area. The table at Schedule 2 of the Regulations describes in Column 1 (10) 'Infrastructure projects' and sub-section (b) refers to 'Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas. The corresponding Column 2 (Applicable thresholds and criteria) refers at sub-section (i) to "the development includes more than 1 hectare of urban development which is not dwellinghouse development". Therefore, the local planning authority determines that the proposal is a Schedule 2 development. In accordance with the Regulations, it is necessary to consider whether the development would lie within a "sensitive area" as defined at Part 1(2) of the Regulations. The proposal is not within a "sensitive area", although the site is within the 'Impact Risk Zones' drawn around SSSIs / Ramsar / SPAs close to the site.	
Screening Opinion	Schedule 3 of the 2017 Regulations sets out the selection criteria for screening developments that may require an EIA. The key criteria are: 1. characteristics of development; 2. location of the development; and 3. types and characteristics of the potential impact. On the basis of the submitted request, the local planning authority considers that the proposal is Schedule 2 development, but would not have the potential to generate significant environmental effects in the location proposed so as to require the submission of an EIA. The conclusion is that the proposal DOES NOT REQUIRE EIA. The reasons for this conclusion, based upon the commentary set out in your request for a Screening Opinion, are set out below.	Noted, no further response required.
Characteristics of development	The characteristics of development must be considered with particular regard to:	Noted, no further response required.

ID / Ref	Thurrock Council Comment	Applicants Response
	(a) the size and design of the whole development - the proposal would not give rise to any significant impacts; (b) cumulation with other existing development and/or approved development - the proposals would not give rise to any significant cumulative impacts; (c) the use of natural resources, in particular land, soil, water and biodiversity - there would be no significant new use of natural resources, with no resources of special importance to land, soil, water or biodiversity being affected; (d) the production of waste - the proposals are unlikely to produce significant levels of waste; (e) pollution and nuisances - the proposals would not give rise to any significant pollution or nuisance; (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge - the proposed development would not give rise to any significant increased risk of accidents or disasters; (g) the risks to human health (for example, due to water contamination or air pollution) - the proposals would not give rise to any significant increased risk to human health.	
Location of development	The environmental sensitivity of geographical areas likely to be affected by development must be considered, having regard, in particular, to – (a) the existing and approved land use – land uses on the site are considered to be of a relatively low environmental sensitivity; (b) the relative abundance, availability, quality, and regenerative capacity of natural resources (including soil, land, water, and biodiversity) in the area and its underground - the proposed development would not result in significant effects on any rare or threatened natural resources;	Noted, no further response required.

ID / Ref	Thurrock Council Comment	Applicants Response
	(c) the absorption capacity of the natural environment, paying particular attention to the following areas— (i) wetlands, riparian areas, river mouths – would not be significantly affected by the proposals; (ii) coastal zones and the marine environment – no significant impacts would be likely; (iii) mountain and forest areas - no significant impacts would be likely; (iv) nature reserves and parks – no significant impacts would be likely; (v) European sites and other areas classified or protected under national legislation - although the site is within the ‘Impact Risk Zones’ drawn around SSSIs / Ramsar / SPAs located close to the site it is not considered that the development would give rise to significant effects on these receptors; (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure – the proposed development would be unlikely to give rise to significant effects; (vii) densely populated areas - the proposals would be unlikely to give rise to significant effects; (viii) landscapes and sites of historical, cultural, or archaeological significance - the proposed development would be unlikely to give rise to significant effects.	
Characteristics of the potential impact	The potential significant effects of development must be considered in relation to criteria set out under paragraphs 1 and 2 above, and having regard in particular to – (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected) - the proposed development would be unlikely to give rise to significant effects at any scale; (b) the nature of the impact - the proposals would be unlikely to give rise to significant effects with reference to the nature of impact;	Noted, no further response required.

ID / Ref	Thurrock Council Comment	Applicants Response
	(c) the transboundary nature of the impact - the development would be unlikely to give rise to significant effects with reference to the transboundary nature of impact; (d) the intensity and complexity of the impact - the proposed development would be unlikely to give rise to significant effects with reference to the intensity and complexity of the impact; (e) the probability of the impact - the development would be unlikely to give rise to any significant effects; (f) the expected onset, duration, frequency, and reversibility of the impact - the proposed development would be unlikely to give rise to new significant effects; (g) the cumulation of the impact with the impact of other existing and/or approved development - the proposals would be unlikely to give rise to significant effects (h) the possibility of effectively reducing the impact - the proposed development would be unlikely to give rise to any new significant effects. With reference to proposed mitigation measures, the local planning authority has taken into account the information to support EIA screening as set out within of your Environmental Screening Report (June 2023) and in accordance with Part 2, 5 (5) (b) of the Regulations are satisfied that features and measures are in place to potentially avoid or prevent what might otherwise have been significant environmental effects:	
Conclusion	Overall, based upon the above assessment, it is considered that the proposal would not result in significant environment effects and therefore an EIA is not required for this proposed development. Please note that this opinion is given on the basis of the information presented in your covering letter and additional Environmental Screening Report dated June 2023 only. I trust that these comments are of assistance. Please note that this letter refers to the 2017 Regulations only and this	Noted, no further response required.

ID / Ref	Thurrock Council Comment	Applicants Response
	Screening Opinion is given without prejudice to the consideration and determination of any future planning application	

1.4 Marine Management Organisation (MMO) EIA Screening response

Table 3: MMO EIA Screening Opinion Response

ID/Ref	MMO Comment	Applicants Response
Email: 01 August 2023	The Marine Management Organisation (MMO) has been considering your application as set out in the EIA you submitted on 07 June 2023. An EIA screening request is only for projects which fall under either Schedule A1 or A2 of the Marine Works (Environmental Impact Assessment) Regulations 2007, which the MMO does not believe your project falls under. If this is the case, please withdraw your EIA screening application. Ultimately the onus of whether the Bored Tunnels exemption is applicable or not is up to yourselves as the applicant, but Natural England do have a Discretionary Advice Service (DAS) through which they can provide advice on whether activities are likely to affect designated sites.	This response was noted and is consistent with responses received on other similar projects. A marine licence is not required as the new tunnel meets the terms of a Marine Licence Exemption set out in Article 35 of the Marine Licensing (Exempted Activities) Order 2011.

