



By email:
lrc.consultation@traverse.ltd

**Sessions House
County Hall
Maidstone
ME14 1XQ**

27th June 2022

Dear Sir/Madam,

Lower Thames Crossing Local Refinements Consultation 2022

Response from Kent County Council

This is Kent County Council's (KCC) response to the local refinements consultation by National Highways on the latest proposals for a new Lower Thames Crossing.

For many years, KCC has made the case for the urgent need for a new Lower Thames Crossing (LTC) that will cater for current and future demand as well as relieving the significant, daily congestion experienced at Dartford and provide greater connectivity north and south of the Thames Estuary to boost both local and national economic productivity. KCC continues to support the proposed LTC and the investment in additional road capacity that will unlock new opportunities for Kent, the South East and the wider UK.

The LTC is the essential first step to improve the strategic route from the Midlands and the North to the Port of Dover which is vital for the UK's trade with the EU. The LTC must be considered as part of a wider package of infrastructure improvements necessary to maintain the UK's international connectivity. To realise the full benefits of the LTC it is essential that the A2/M2 corridor to which it connects is looked at holistically. Improvement schemes identified as pipeline projects for the next Road Investment Strategy at 'A2 Brenley Corner' and 'A2 Access to Dover' need to be delivered alongside other capacity enhancements along the M2 and improved connections to the M20 to ensure that the two strategic corridors to the Port of Dover and Channel Tunnel are resilient.

The A229 at Bluebell Hill which connects M2 Junction 3 with M20 Junction 6 is an example of these strategic links and originally considered to be part of the LTC scheme (the Option C 'variant'). It needs improving to accommodate the additional LTC traffic alongside local plan growth and is the subject of a Large Local Major scheme bid to the Department for Transport. However, there is a funding gap which will hamper delivery unless a contribution from National Highways to compensate for the LTC impact is made.

Our response to the 2018 statutory consultation, 2020 supplementary consultation, 2020 design refinement consultation and 2021 community impacts consultation have



all outlined in detail our overall support for the scheme, but also our concerns regarding the impact on the environment and existing highway network.

Whilst KCC continues to support the scheme in principle, our response to the community impacts consultation in 2021 outlined the five key areas where we have concerns.

1. Lack of environmental information

Little environmental information has been shared with the County Council since our response to the community impacts consultation last year. This is a significant concern for the County Council as without sight of any technical information, including information regarding the nitrogen deposition methodology, we are unable to fully understand the environmental impacts and provide meaningful feedback on proposed mitigation.

It is inevitable that communities adjacent to the new road will be adversely impacted as a result of the new crossing and it is imperative KCC understands the extent of these environmental impacts so we can work with National Highways to determine the most appropriate mitigation.

2. The impact on Shorne Woods Country Park

In response to the community impacts consultation, we welcomed the reduction in the utility corridors and the work that has been undertaken with statutory undertakers to reduce the impact of the necessary diversions. However, no update has been provided since and we continue to await confirmation as to whether the 60 metre high pressure gas pipeline easement through Shorne Woods Country Park has been reduced, and to what size.

3. The impact of the scheme on the local and strategic highway network

KCC has long made the case for appropriate mitigation and we welcome the opportunity to work with National Highways to fully identify and mitigate the direct impacts the LTC will have on other areas of the local highway network once operational. However, there is little clarity as to how delivery of these mitigation measures will be funded and without any commitment KCC will have to seek to secure them through the Section 106 Agreement.

Furthermore, KCC is concerned about the lack of mitigation for the wider strategic road network (SRN). The traffic modelling identifies increased traffic flows on the SRN, including M2 Junctions 1, 2 and 3, the A2 Junction with the A227, and M25 Junctions 2 and 3. Whilst we welcome the inclusion of A2 Brenley Corner and A2 Dover Access as pipeline schemes for Road Investment Strategy 3 (RIS3), we are concerned that there is currently no



commitment from National Highways to improve the junctions identified above which will be adversely impacted as a result of the LTC.

4. The impact on existing road assets

The impact on KCC's existing road assets continues to be an area of concern for the County Council. Measures to address the deterioration of KCC's local road network as a result of the LTC construction have been discussed with National Highways and an agreement in principle on a monitoring strategy has been made but there remains no firm commitment from National Highways to carry out a proactive approach to essential strengthening works. If local roads deteriorate during the construction phase, rather than being made more resilient beforehand, the remedial response is likely to only be a reactive and localised one. This approach is likely to lead to considerable local angst and will not aid National Highways in the delivery of the scheme.

5. The impact on construction workforce

We previously welcomed the work that has been undertaken so far around skills and employability, including the production of a Skills and Employability Strategy. However, there is no update on the work National Highways is doing to identify specific skills gaps and invest in training, including delivering a construction skills centre, to ensure local workers have the skills required to deliver the project and leave a lasting legacy to the area.

The skills shortage not only applies to construction but also in terms of the environmental assessment of the scheme e.g. ecologists, archaeologists, to name just a few, and opportunities should be taken to upskill the local workforce in these important professions that are vital to enable delivery of schemes. It is imperative National Highways works closely with the County Council and other educational institutions to ensure appropriate courses are made available and all attempts are made to ensure a skilled workforce is available.

Furthermore, if projects like the LTC and HS2 go ahead, they will create a vacuum on skilled labour which will impact KCC's ability to deliver other schemes. The amount of available labour has diminished as a result of Brexit and Covid so National Highways need to carefully consider the wider knock on impacts of constructing the LTC.

In respect to the design changes presented within this latest consultation, KCC strongly supports the majority of the changes since the community impacts consultation, which for Kent focuses mainly on improvements to Public Rights of Way. However, we have concerns regarding the nitrogen deposition proposals and the need for compensation as a result of increased traffic volumes on the wider road



network, such as the A229 Blue Bell Hill. It remains clear that the LTC will result in an increase in traffic on Blue Bell Hill, yet it is unfortunate National Highways are yet to commit to any mitigation on such a key strategic link between the motorway corridors.

Please find attached our response to the consultation questionnaire which sets out our comments in further detail. We would ask National Highways to continue to meaningfully engage with the County Council on all relevant matters up to and beyond resubmission of the Development Consent Order (DCO) application.

Yours sincerely

Simon Jones

Corporate Director for Growth, Environment & Transport
Kent County Council



Kent County Council's Response to the Lower Thames Crossing Local Refinements Consultation Questionnaire

1. Changes since the community impacts consultation

Changes south of the river in Kent

Q1a. Do you support or oppose the proposed changes to the section of the route: the A2/M2 corridor?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q1b. Do you support or oppose the proposed changes to the section of the route: south of Gravesend (A2/Cyclopark)?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q1c. Do you support or oppose the proposed changes to the section of the route: south of the River Thames/southern tunnel entrance?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q1d. Please let us know the reasons for your response and any other comments you have on the proposed changes south of the river. If you're providing feedback on specific changes or sections of the route, please refer to these in your response to this question.

Overall KCC's Public Rights of Way (PROW) team support the proposals regarding improvements and changes to the public rights of way network, with landowner consent where relevant.

Refinements to woodland planting around Shorne Ifield Road –

KCC welcomes the relocation of some of the compensatory tree planting that was previously proposed north of Shorne Ifield Road as this will remove any significant impact on the buried remains of a medieval settlement, but the proposed new area will need to be subject to appropriate assessment and field evaluation and there is the risk that further, significant



archaeological remains may be found and further consideration given to the location and nature of compensatory tree planting.

Extension of open space provision (east of Chalk Park) –

KCC's PROW team welcomes the extension of open space provision to the east of Chalk Park and we would encourage inclusion of a Non-Motorised User Route within the proposals to encourage active travel to and from the new park.

Redesignation of Hever Court pedestrian-cycle track north of the A2/LTC junction to a bridleway –

KCC's PROW team welcome the proposed improvements and redesignation of Hever Court pedestrian-cycle track north of the A2/LTC junction to a bridleway, however changing NG17 to a bridleway will require landowner consent and minor works to improve the entrance on the MCR177 (A2), it is not clear within the consultation materials as to how this will be achieved.

Redesignation of footpath NS169 as pedestrian-cycle track at Michael Gardens –

KCC's PROW team agree with the proposed redesignation of footpath NS169 as a pedestrian-cycle track at Michael Gardens, however a legal event to change the designation of this path may be required and National Highways should take consider this need accordingly.

A2 Roman Road increased working area for electricity works –

KCC's PROW team welcomes the proposals to extend the Order Limits along a section of the Roman Road and Pepper Hill to retain vegetation and avoid a potential closure to NCR 177 as a result of necessary utility works. However, the potential for archaeological impacts should be noted and appropriate mitigation will need to be allowed for in the Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS/OWSI) which will form part of the forthcoming DCO submission.

Redesignation of footpath NG8, south of the A226 Gravesend Road –

KCC's PROW team supports the British Horse Society's request and welcomes the subsequent redesignation proposal by National Highways. However, we would ask for the redesignation to include improvements to the crossing point (of the A226) as currently this part of the route is unsuitable for horse riders. Furthermore, improvement works should be extended slightly south to the bus stop to improve this part for pedestrians.



Changes north of the river in Thurrock, Havering and Essex

Q1e. Do you support or oppose the proposed changes to the section of the route: the Tilbury area?

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Q1f. Do you support or oppose the proposed changes to the section of the route: A13/A1089 junction?

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Q1g. Do you support or oppose the proposed changes to the section of the route: Mardyke Valley/North Road?

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Q1h. Do you support or oppose the proposed changes to the section of the route: M25 junction 29?

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Q1d. Please let us know the reasons for your response and any other comments you have on the proposed changes north of the river. If you're providing feedback on specific changes or sections of the route, please refer to these in your response to this question.

For details regarding the proposed design changes north of the river, KCC defers to the view of those Local Authorities directly affected.



2. Improvements for walkers, cyclists and horse riders

Q2a. Do you support or oppose the proposed changes to our plans for walking, cycling and horse riding routes?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Please let us know the reasons for your response and any other comments you have on the proposed changes to our plans for walking, cycling and horse riding routes. If you're providing feedback on specific changes, please refer to these in your response to this question.

KCC's Public Rights Of Way (PROW) team supports the creation of new walking, cycling and horse riding (WCH) routes wherever they are consented to by the relevant access authorities. We also welcome the redesignation of existing routes, where appropriate, to encourage active travel and promote health and wellbeing across the region. The engagement so far on the improvements to WCH routes has been positive and discussions now need to be had around any transfer of assets, e.g. green bridges, and agreements put in place for ongoing maintenance of these new PROW. KCC's PROW team look forward to continued working with National Highways and the LTC team on these elements of the proposals.



3. Nitrogen impact and compensation

Q3a. Do you support or oppose our initial proposals for compensation area: M2 corridor and Blue Bell Hill?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Please let us know the reasons for your response and any other comments you have on our initial proposals for compensation area: M2 corridor and Blue Bell Hill.

Biodiversity

KCC agrees that the usual nitrogen dioxide mitigation measures, such as reducing speeds and installing nine metre high vertical barriers, would not be suitable on this occasion and also have the potential to be harmful to local wildlife.

Well managed compensatory tree planting is a good option to capture nitrogen (dropped in the leaves), reduce noise and store carbon and as it is almost impossible to remove nitrogen, scraping small areas that would benefit from some bare ground introduction (adding habitat structure) is another alternative for areas of compensatory land.

It may also be possible to enhance and improve the management of the affected areas with conservation grazing and the right expertise. A shared grazing base on the Kent side would give the mitigation strategy some real longevity and light conservation grazing is essential ecological restoration for so many habitat types.

Consideration should also be given to ways of encouraging electric vehicles to use those parts of the affected road network routes that are most likely to be significantly affected by nitrogen dioxide emissions.

KCC would encourage National Highways to seek advice before deciding to erect security fencing around the perimeter of the compensation areas. This is because other types of fencing, such as deer fencing might be more cost effective and appropriate.

Overall, 250ha of compensatory habitat is a great opportunity for Kent and KCC's Biodiversity Team look forward to reviewing the updated Outline Landscape and Ecology Management Plan.

Cultural Heritage

With regards to archaeology and cultural heritage, National Highways need to undertake a thorough historic landscape assessment and archaeological field evaluation of each proposed site to determine and mitigate the impact on heritage assets.



Kent Downs Area of Outstanding Natural Beauty

In regards to the Kent Downs Area of Outstanding Natural Beauty (AONB), it is notable that the majority of sites likely to be affected are located not only south of the river, but within the Kent Downs AONB and many of these are located on the actual escarpment of the North Downs, the main target of the original AONB designation. This adds to the potential harm to the Kent Downs AONB arising as a result of the scheme geographically beyond that previously known about, as the rich and distinctive biodiversity habitats of the Kent Downs are specifically recognised as one of its Special Characteristics.

KCC echoes the concerns of the Kent Downs AONB Unit in that while the affected sites are located mainly in the Kent Downs AONB, it is disappointing that less than half of the total proposed compensation area is proposed in the Kent Downs (42% within the AONB at a single site at Blue Bell Hill), which does not appear to provide for equivalent compensation to potential assessed harm to the biodiversity rich habitats of the AONB itself. Therefore, KCC would support the Kent Downs AONB Unit's request for carefully managed public access to be secured across large parts of the compensatory site, to connect into the North Downs Way national trail.

Traffic Modelling

Whilst KCC is not opposed to the compensatory land being proposed, we are concerned regarding the increase in traffic on the A229 Blue Bell Hill that warrants such compensation.

The requirement for the compensation land causes concern over the impact of the LTC on the A229 Blue Bell Hill, particularly given that the A229 and M2 J3 are highlighted in the consultation document as one of two locations predicted to experience significant effects (page 174). Furthermore, figure AP1-1 on page 165 of the Guide to Local Refinement Consultation indicates that the A229 (including the junctions at M20 J6 and M2 J3) is part of the affected network (i.e. expecting an increase of over 1000 vehicles Average Annual Daily Total (AADT)). This is in line with what we expected on the basis of previous traffic data, but the figure also shows the M20/M26 to the west of the A229 increasing in traffic whereas previous consultation documents have generally demonstrated a reduction along this part of the network. KCC would welcome clarification on whether the traffic figures for the nitrogen deposition are calculated differently to the other traffic numbers, or is this change a result of an update to the traffic model? KCC would like to see more detail on the level increase in traffic around the A229 Blue Bell Hill and other local roads, and understand what the impacts are for other pollutants/particulates.

Furthermore, the consultation does not reference the impact of the increasing traffic on the M20/Maidstone Air Quality Management Area (AQMA) or how the declared pollutant (which is Nitrogen Dioxide, see [AQMA Details](#)) levels will be impacted despite the affected network failing within the AQMA.

There is no information regarding National Highway's assumptions about the rates at which transport will decarbonise. Clarification is needed as to whether the assumed rates of decarbonisation have been approved by the Department for Transport and further technical information is needed to understand whether the compensation proposals are sufficient, particularly given that so many designated sites are impacted in Kent.



Despite the emerging information regarding nitrogen impacts, there is no detail within the consultation on updates to the traffic modelling. The nitrogen deposition proposals help to mitigate the effects of an increase in traffic, but there is little attempt to deal with the congestion on the M2 J3 and A229 which would help mitigate some of the air quality issues.

This supplementary consultation is yet another example of the LTC's impact on the A229 Blue Bell Hill, without any mitigation being proposed to address the increase in traffic volumes as a result of the new crossing. It is imperative National Highways mitigate the impact of their scheme on what is a key strategic link between the M20/A20 and M2/A2 motorway corridors.

Q3b. Do you support or oppose our initial proposals for compensation area: Gravesham and Shorne Woods?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Please let us know the reasons for your response and any other comments you have on our initial proposals for compensation area: Gravesham and Shorne Woods

Additional planting is already proposed for the direct loss of woodland within and surrounding Shorne Woods Country Park. We recommend consideration is given to whether some of that planting can have a dual purpose and be utilised for the nitrogen deposition mitigation, to avoid unnecessary land take.

If extra land take is unavoidable, then KCC would echo the support of the Kent Downs AONB Unit that the proposed compensation sites at Shorne and west of Ashenbank Woods are located close to or contiguous with the AONB boundary.

We would also ask that any designs for these compensation areas reflect the existing landscape as much as possible, and are subject to a thorough archaeological assessment and evaluation to determine and mitigate the impact on heritage assets.

Q3c. Do you support or oppose our initial proposals for compensation area: Southfields, Thurrock?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know



Please let us know the reasons for your response and any other comments you have on our initial proposals for compensation area: Southfields, Thurrock.

For details regarding proposed compensation areas north of the river, KCC defers to the view of those Local Authorities directly affected.

Q3d. Do you support or oppose our initial proposals for compensation area: Hole Farm, Brentwood?

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Please let us know the reasons for your response and any other comments you have on our initial proposals for compensation area: Hole Farm, Brentwood.

For details regarding proposed compensation areas north of the river, KCC defers to the view of those Local Authorities directly affected.

However, KCC's asks National Highways to seek to secure a similar arrangement south of the river. A 50ha+ area of compensatory land should be leased through the Forestry England Woodland Partnership as mitigation measures would be more successful with a permanent base on the Kent side to manage the conservation work.

Q3e. Do you support or oppose our proposed methodology for addressing the potential impacts of nitrogen?

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Please let us know the reasons for your response and any other comments you have on our proposed methodology for addressing the potential impacts of nitrogen.

It is disappointing that the consultation material lacks any real detail around the methodology and the rationale for why these particular compensatory sites have been chosen.

Whilst in principle KCC agrees with the approach National Highways propose for assessing the nitrogen deposition, we are unable to advise on whether the approach is appropriate until the detail has been provided. In addition, we have concerns regarding the traffic modelling that has been used as part of the methodology and there is a need for surveys to be carried out on the sites proposed for planting to consider the impact of the proposed



planting on protected/notable species. The planting appears to be within arable fields so, in particular, consideration will have to be given to the presence of ground nesting birds.

Cultural Heritage

With regards to archaeology and cultural heritage, National Highways need to undertake a thorough historic landscape assessment and archaeological field evaluation before the principle of compensation habitat is decided. The risks otherwise are highlighted by the positive example, included within the consultation document, of shifting compensatory planting away from an identified medieval settlement north of the Shorne Ifield Road, as it was considered that the planting would have had a significant impact on those buried archaeological remains. However, the new area for compensatory planting will also need to be subject to an appropriate assessment and evaluation and there is a risk that further significant archaeology may be discovered which might then require further changes to the compensatory planting proposals.



4. Changes to the Order Limits, special category land and private recreational facilities

Q4a. Do you support or oppose the changes to the proposed area of land that would be needed to build the Lower Thames Crossing?

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Please let us know the reasons for your response and any other comments you have on the proposed changes to land that would be needed to build the Lower Thames Crossing. This includes feedback on the impact the project would have on any land that you may own or have a legal interest in or right to use.

The main changes to the order limits south of the river focuses on the inclusion of two nitrogen deposition compensation sites. Whilst KCC does not disagree with the proposals in principle, we would ask National Highways to ensure they are undertaking a thorough assessment to ensure the selection of sites are the most suitable for compensation purposes (including undertaking archaeological investigations to ensure the proposals will not impact on any heritage assets).

Q4b. Do you support or oppose the changes proposed regarding special category land?

- Strongly support
- Support
- Neutral**
- Oppose
- Strongly oppose
- Don't know

Please let us know the reasons for your response and any other comments you have on the changes proposed regarding special category land. If you're providing feedback on specific sites, please refer to these in your response.

Within this latest consultation there are no changes proposed regarding special category land south of the river. Therefore, for details regarding proposed changes north of the river, KCC defers to the view of those Local Authorities directly affected.

Q4c. Do you support or oppose the changes proposed regarding private recreational facilities?

- Strongly support
- Support
- Neutral**
- Oppose



Strongly oppose
Don't know

Please let us know the reasons for your response and any other comments you have on the changes proposed and information provided regarding private recreational facilities. If you're providing feedback on specific sites, please refer to these in your response.

Within this latest consultation there are no changes proposed regarding private recreational facilities south of the river. Therefore, for details regarding proposed changes north of the river, KCC defers to the view of those Local Authorities directly affected.



5. Other Comments

We would welcome any other comments you would like to make about the Lower Thames Crossing.

Age of Survey data

KCC recommends that if the survey data is older than two years then there will be a need for an updated Preliminary Ecological Appraisal submitted as part of any submission. [Advice Note \(PDF\)](#) From the point of view of the applicant this will hopefully demonstrate that the survey data is still valid but it may identify a need for additional/updated surveys to be carried out. KCC would expect the survey data submitted with the submission to be valid – either because it is less than 18 months old or it is supported by a PEA demonstrating that the information is still likely to be valid.

Public Transport Provision

KCC welcomes the LTC objectives agreed with the Department for Transport to:

1. to relieve the congested Dartford Crossing and approach roads, and improve their performance by providing free flowing, north-south capacity
2. to improve resilience of the Thames crossings and the major road network
3. to improve safety
4. to support sustainable local development and regional economic growth in the medium to long term
5. to be affordable to Government and users
6. to achieve value for money
7. to minimise adverse impacts on health and the environment

Multiple studies over time have pointed toward public transport (PT) solutions to support the same objectives locally, as a mean to reduce local car traffic / congestion and improve environment and unlock economic growth. The successful Fastrack scheme in Kent is a prime example of how this can be achieved. It primarily relies on providing high quality, frequent public transport; operating with competitive journey time on segregated infrastructure where suitable. One would therefore hope to see PT part of the mitigation measures proposed in the Local refinement consultation document.

However, KCC notes that the consultation document does not refer to public transport nor considers the previous comments made in relation to encouraging and facilitating public transport access at the entrances and exits of the LTC at a minimum. The provision of such accesses would:

- futureproof the provision of attractive public transport journey time,
- enable the provision competitive alternative to use of car for local trips,
- enable significantly increase accessibility of non-car users,
- and contribute to other LTC objectives agreed with DFT

As mentioned before; this could be done by providing segregated or quicker access to/in/from the LTC for public transport vehicles, joining to local roads such as the A226 in KCC and similar quick access to the main centre of activities in Thurrock. While new public transport segregated junctions would be welcome, alteration of emergency accesses to allow public transport vehicles could provide the same benefits.

6. The consultation

Please let us know your views on the quality of our local refinement consultation materials, the accessibility of our online information and events, how we have notified people about our proposals, and anything else related to this consultation.

	Very Good	Good	Average	Poor	Very Poor	Not applicable
Was the information presented clearly?		X				
Was the website easy to navigate?		X				
Were the information videos useful for understanding our latest proposals?	X					
Did the telephone surgery answer your questions about our latest proposals?						X
Were the physical events good quality?						X
Were the physical events suitably located?		X				
Was the consultation promoted well and to the right people?	X					

Please let us know the reasons for your responses and any other comments you have on the delivery of this consultation.

Presentation of information

The majority of information within the consultation material was presented clearly, with helpful maps and graphics to understand details of the latest changes. However, Chapter 5 of the main Guide to the Local Refinement Consultation focused on the nitrogen deposition compensation. The technical nature of these proposals is understandably difficult to explain within a document, but KCC felt there were a number of maps within the consultation material that could have easily been misinterpreted and were not explained clearly.

Timing of consultation

Previously KCC had raised concerns regarding the proposed timings for this latest Local Refinements Consultation, due to a clash with the Easter holidays and pre-election periods for a number of host authorities. It was position National Highways took this feedback on board and postponed the launch of the consultation until after these events had taken place.

KCC also welcomes National Highways one week extension to the deadline for consultation responses for local authorities. As has always been the case, the length of consultations can often prohibit local authorities from undertaking any formal governance process, so it is



positive National Highways have taken this feedback on board and allowed an extra week for local authorities to provide a fully governed response.