

## Appendix 3

### Gravesham Borough Council response to Lower Thames Crossing Consultation

#### 1 Changes to the route

For the purposes of this supplementary consultation, we have divided our proposed route for the Lower Thames Crossing into two sections, starting with the section south of the river in Kent, then the section to the north of the river in Thurrock and Essex.

A detailed description of our proposed route for the Lower Thames Crossing is in chapter 3 of the guide and is presented in the Map Books.

#### South of the river in Kent

This refers to the section of the proposed route starting at the M2/A2 and ending at the southern tunnel entrance.

The guide describes the proposed changes to sections of the M2/A2 around the junction with the Lower Thames Crossing. Changes include removing the M2/A2 link at M2 junction 1, which is replaced with a new link road connecting Valley Drive to the A2 eastbound; M2/A2 narrowing; changes to the M2/A2 junction; A2 local connections and the southern tunnel entrance move and redesign.

**Q1a.** Do you support or oppose the proposed changes south of the river?

Please refer to chapter 3 of the guide.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q1b.** Please let us know the reasons for your response to Q1a and any other comments you have on the proposed changes south of the river.

#### **General note:**

The comments provided below are 'without prejudice' to the Council's in principle opposition to the Government's preferred route choice for Lower Thames Crossing on the grounds that such a choice has yet to be properly justified on the basis of evidence set against scheme objectives and the assessment of reasonable alternatives.

Irrespective of this, whilst the Council welcomes some of the changes proposed since the previous consultation, the significant adverse community and environmental impacts of the proposals are a cause for major concern, despite the fact that many still remain to be understood as the scheme develops. This may mean that, ultimately, any such proposal remains unacceptable in policy terms.

Attention is also drawn to the response made under Question 8 below, in terms of the adequacy of consultation and other issues relating to information and evidence provided to date.

In the responses provided below:

- Access to/from the A289 means access to the parallel roads north and south of

main road that serve the A289 Wainscott bypass and the A2 into Strood and start just east of Marling Cross.

- M2 means access to the M2, which is effectively extended west from Junction 1 to a point just east of the existing Marling Cross junction (Gravesend East).
- Local link road means the local road link to the south of the main road running from Marling Cross to the Halfpence Lane roundabout at Cobham. Note that the existing section of this running east-west which was called Thong Lane has been renamed Darnley Lodge Lane to sort out address confusion in this area.

### **Tunnel Portal (Southern)**

The Council welcomes the decision to move the tunnel portal 350 metres further to the south – making a 950m change overall from the 2016 proposal consulted on at the non-statutory stage.

### **A2 junction with Lower Thames Crossing**

The inclusion of the link from Marling Cross onto the M2 eastbound rather than just onto the Lower Thames Crossing is a result of comments received at the Statutory Consultation stage. Whilst this is welcomed in principle, the lack of any robust transport modelling and objective assessment of the benefits of improved connectivity, compared to the increased complexity of the junction and associated environmental impacts, makes it extremely difficult to make a judgement on this change.

Further, the consultation material lacks sectional and detailed drawings portraying how the junction would sit in the landscape and relate to its surroundings. Whilst the visual images provided are useful, they are insufficient for consultees and the public to make a proper assessment of impact and attention is drawn to comments made by the Council previously on having a proper computer generated terrain model which could be used to more accurately understand landscape impacts. The Borough Council notes the observations made by the Planning Inspectorate on the need for 3D visualisations in relation to their rejection of the Thurrock Energy DCO for Examination.

This is a particularly sensitive landscape where a statutory duty exists in relation to the preservation of the natural beauty of the Kent Downs AoNB and the proposals are also likely to result in cumulative substantial harm both to the setting of a Grade II\* designated park and garden at Cobham Hall, its wider setting and a significant range of designated and non-designated historical assets. The use of such a design tool in the context of what is a £6.8bn scheme would therefore have been fully justified in order to understand, minimise and mitigate significant adverse effects.

The Council would also question the realism attached to the illustrative material in that it shows extensive planting between different elements of the junction, where access for maintenance would be extremely difficult. It is questionable therefore whether the final form of the junction will be capable of being mitigated to this extent and it is requested that what is presented at the DCO application stage should be realistic. In this respect, the Council is well aware from the construction of HS1 and the previous A2 widening, that outcomes do not always reflect original aspirations.

It would also have been useful if an initial safety audit of the junction design had been published alongside the Supplementary Consultation, given it remains uncertain as to

whether the junction is deliverable in this form or if further substantive design changes will be required.

The promoter is also reminded that the original proposals for the Western Southern Link (WSL) in 2016 proposed a 50 mph design speed for the junction and this only increased to 70 mph following the preferred option for the Eastern Southern Link (ESL) being dropped. Returning to a 50 mph design speed for the WSL may not significantly alter the geometry, and therefore the impact of this element, but it should at least be properly considered and presented as a reasonable alternative within the Environmental Statement (ES) at the DCO application stage.

### **Detailed Comments**

These comments follow the numbering of the changes as listed on pages 22 to 25 of the Guide to Supplementary Consultation and figures 5.1 to 5.10 on pages 26 to 30. Map Book 3 (Engineering Plans) has also informed these comments.

**1 Relocation of the private maintenance and access road:** this is logical but will need to be carefully designed to fit into the overall landscape. It will also have to relate to wherever the proposed electricity substation is located.

**2 Southern portal:** The Council welcomes this being moved southwards as noted above with the caveat that the scheme now impacts directly on Gravesham Borough Council land and this will need to be subject to detailed discussions as to mitigation, compensation and the master planning of the residual area lying between Thong Lane and the Lower Thames Crossing.

**3 Alterations to private maintenance road:** This replicates what existed in the previous design. It is unclear whether this is simply for maintenance and emergency service access or whether it would be used if it became necessary to turn traffic around in the event of a tunnel closure. How accessible will this road be (i.e. will it be gated) since it is an obvious location where unauthorised encampments, U turns or parking could occur?

**4 Thong Lane Green Bridge:** The enlargement of the Green Bridge is welcome but greater understanding is needed of how this relates to the Thong Conservation Area. It is noted here that two of the 1920s semi-detached properties within the Conservation Area, constructed as part of the London County Council smallholdings (Home for Heroes) scheme, would be demolished. This is a cause for concern as it would cause significant harm to a key feature of this designated heritage asset. Such demolition would need to be fully justified, mitigated and be subject of a comprehensive package of compensatory measures that will (amongst other things) need to be discussed with this authority. Officers have undertaken extensive research on the historic significance of Thong in the context of the wider Darnley Estate (Cobham Hall) and encourage Highways England to engage with this authority on the matter in more detail.

**5 Direct link from Marling Cross junction to the eastbound M2:** Subject to the caveats set out above, this is welcomed. Access to the A289 is understood to be via the local feeder road and Brewers Road junction.

**6 Signage coming east along the A2 from Tollgate:** The Borough Council wishes to express significant concerns over this section of the proposed scheme given the

complexity of movements that are likely to take place and the signage that would be required. Apart from the addition of merging traffic from the A2/A227 Tollgate junction, drivers will face a 4-way choice of route between leaving the road at Gravesend East/Marling Cross; joining the Lower Thames Crossing route; taking the parallel feeder leading to the A289/A2; or passing directly through on the extended M2. This choice would need to take place in a relatively short distance which implies a significant amount of weaving. The reduction of what is the M2 through the junction to 2 lanes does not look sensible given existing flows, but without detailed traffic figures it is not possible to judge how realistic it is. Given the restricted nature of the A13 junction in Thurrock, the Dartford Crossing is likely to remain the preferred route to access parts of Thurrock and East London, so a considerable proportion of movements are likely to consist of through traffic.

**7 Marling Cross junction:** The Supplementary Consultation shows this converted into a gyratory system with two sets of traffic signals, whereby local traffic wishing to pass from Valley Drive to Hever Court Road would have to cross over the A2 and then return in a northbound direction to make what is currently a simple local trip. No transport modelling has been provided to justify such a change; no information is provided on alternatives and why these were discounted; and no information is provided on how close to capacity the junction would be. The impression given is that the proposed change is a matter of expediency, instead of undertaking a full junction upgrade that will provide a long-term solution. Given this would be detrimental to local people living north and south of the A2 at this point, and may have knock-on effects on the local road network, the Council wishes to better understand why this is being proposed and the alternatives considered. The starting point should be that direct access between Valley Drive and Hever Court Road should be maintained on the north side at this point. Concern is also expressed over potential changes in flows in Henhurst Road that may occur as a result of the scheme, both during the construction and operational phases.

**8 + 8a Loss of Cobham junction on and off slips allowing direct access to the main road:** The loss of the Cobham junction on/off slips has benefits in that the impact on Halfpence Lane is an apparent reduction in traffic. However there are other factors at work including an increase in traffic on Cobhambury Road coming up from Cuxton. This would, at first sight, appear to be a result of a combination of congestion of the A228/M2 and the inclusion of Peter's Bridge, Halling in the modelling, which was missing before. A more detailed analysis of traffic figures are needed to understand the net effects. Clearly, it is not desirable to induce increased flows of traffic along narrow rural lanes south of the A2 and through Cobham Village in particular, and any unacceptable adverse effects will require mitigation.

The Council has significant concerns over the potential impact of the temporary closure of the Brewers Road bridge to allow reconstruction; the severing of direct links on and off the Strategic Road Network at this point; and the fact that those wishing to access the M2 eastbound from Brewers Road will be diverted down and back up the A289 to Higham to do so (Figure 5 – 6). The lack of an overall construction programme means that it is impossible to place individual elements in a wider context and see the interactions between them, and thereby understand the implications.

These changes are likely to have a significant negative impact on Shorne Woods

Country Park; the Rochester and Cobham Golf Club; Cobham Hall School; local businesses in the villages to the north and south of the A2; and cause disruption to the daily lives of local people. No formal assessment appears to have been undertaken of either these impacts or those on the local road network during the construction period. These need to be understood before any conclusion is reached on the acceptability of the proposals, having regard to mitigation measures and an appropriate package of compensation.

In addition, if as a result of the proposed highway changes, the roundabout to the south of the A2 at Halfpence Lane becomes redundant, a less intrusive junction design could replace it, so consideration should be given to the removal of the roundabout and the inclusion of improved landscaping at the entrance to Cobham Park. This could form part of the landscape mitigation/compensation package associated with the scheme.

**9 Traffic signals on Brewers Road:** Since this junction functions perfectly well as an access onto the mainline A2 at present, it is not clear why traffic signals are needed here even allowing for increased flows from Marling Cross to reach the A289. A fuller explanation is required, given a signalised junction would appear to be at odds with what is supposed to be a rural location within the Kent Downs AoNB.

**10 Narrowing of M2/A2 lanes and central reservation.** The loss of the vegetated central reservation will have a significant and regrettable negative impact on the landscape and views from the east. Loss of vegetation to the south side of the road west of the Brewers Road junction will also have a negative impact. On balance this increases the urbanisation of this stretch of the Kent Downs AoNB and the severance of the woodlands north and south of the A2 that once formed part of the wider Cobham Park.

The consultation material is poor and misleading in respect of presenting such impacts. For example, page 30 of Map Book 3: Engineering Plans includes a 'typical cross-section' of the widened A2/M2 at a point immediately west of the Brewers Road junction. Not only does this fail to compare existing with proposed, it also omits the proposed feeder road to the south of main carriageways and the HS1 cutting. The central reservation in the cross section is shown in the order of 11m, whereas from the drawings it generally seems to be more like 5m. The entire corridor, including HS1, needs to be treated as a whole. The landscape solution that eventually came forward as part of the HS1/A2 widening package was not particularly successful and the proposed new works will result in significant cumulative harm. The issue of the loss of HS1 landscaping and mitigation has not been addressed.

The Council would also argue that further sectional drawings should have been provided along this section of the route, comparing existing with proposed and showing the full width of the transport corridor to demonstrate impacts. The current highway is set at varying levels at some points and this is likely to result in a need for retaining walls that are also likely to make the corridor more urban and harsh.

Whilst it may have other negative effects, the Council would argue that consideration should be given to retaining planting between the main carriageways and HS1 to the south to soften impact and decrease severance. Even if this is not considered to be the optimum design solution, it is a reasonable alternative and it should have been

properly considered and evidenced within the Supplementary Consultation so that it could be formally set aside prior to submission.

**11 A2 Eastbound Link.** Whilst the need to remove this direct link on safety grounds is understood given highway safety and the constraints imposed by the highway design solution associated with the route, the potential negative consequences set out under points 8 and 8a above still need to be addressed.

**12 Widening of the Thong Lane (north) bridge:** This change is welcomed in that it provides a substantially improved green link over the trace of the road. However, as noted above, there is a need to fully understand what this means in terms of impacts on Thong. Of particular concern are impacts on the heritage value of the Conservation Area and implication in terms of traffic flows and highway safety. Negative impacts need to be addressed through a comprehensive package of mitigation and/or compensation resourced by the project. On-going monitoring will also need to be undertaken as part of a requirement attached to the DCO, with triggers included whereby the promoter is required to undertake remedial measures where unacceptable residual effects are identified.

**13 – 15 Changes to A2/LTC junction design:** Whilst the functional changes in design are generally welcomed, the lack of more detailed drawings, sections and a computer generated landscape terrain model through which impacts could be better understood means that it is not possible to comment further at this stage. In particular it is hard to assess the implications for the setting of the AoNB and views from residential properties without a clear understanding of the levels involved in relation to landform. Other comments in relation to the junction, set out above apply.

**16 Widening of Thong Lane (south) bridge over A2 from 15.8m to 29.5m:** The inclusion of a wider green bridge here is welcomed as it will improve connectivity of the woodlands to the north and south of the A2.

However, in the absence of ecological survey data and an expert appraisal of the impact of the rest of the proposal (including increased levels of traffic etc.) it is not possible to determine whether this is sufficient. An interim report on nature conservation impacts due to severance would have been useful, detailing before and after scenarios, outlining the proposed package of mitigation/compensation measure of which the green bridges only form part.

In terms of the design of any green bridges, it is suggested that the guidance issued by Natural England and the Landscape Institute be followed in terms of the ratio of width to length. The Council is also mindful of the fact that both the Thong Lane and Brewers Road bridges are located some distance apart following an older highway network and that additional measures may also be required to improve wildlife connectivity and reduce severance. The promoter will need to clearly set out how their proposals seek to address this based on evidence and supported by expert advice.

In addition to the above, the Council is concerned that the highway improvements here may induce additional flows through Thong and any adverse impacts will need to be addressed. It is also not clear what will happen to the Inn of the Lake hotel where their car park, if not the buildings, will be required for construction purposes. This area will need a comprehensive restoration plan due to the major impacts, as currently understood, of the construction process. Similar comments as those set out under

point 12 apply.

**17 Marling Cross bridge widened from 19 metres to 24 metres, to provide 4 lanes:** The comments provided at point 7 above apply. In addition, the Council would wish to ensure that the ability of non-motorised users accessing the countryside to the south and the Forest England site at Jeskyns is not impaired.

**18 New bridge over HS1 drainage pond:** Noted. Any drainage or ecological implications of this would need to be understood as part of the scheme and addressed through mitigation as necessary.

**19 Reduction in length of tunnel under A2 at new junction from 227 metres to 175 metres:** Noted. This forms part of new junction design and more detailed comments set out above apply.

**20 Change in alignment of new Brewers Road bridge to avoid HS1 tunnel:** Noted. This appears to be a technical change to avoid a constraint.

### North of the river in Thurrock and Essex

This refers to the section of the proposed route starting at the northern tunnel entrance and ending at the connection with the M25 at junction 29.

As presented in the guide, we have split this into four sub-sections:

- The area around the previously proposed Tilbury junction (changes include: the northern tunnel entrance redesign, removal of the rest and service area and maintenance depot, and reducing the length of the Tilbury viaduct).
- The area around the A13/A1089 junction (changes include: moving slip roads and connecting roads away from properties, moving the Lower Thames Crossing route 60 metres closer to Linford, retaining the existing Rectory Road and closing part of Hornsby Lane).
- The area around the Lower Thames Crossing junction with the M25 (changes include: removal of one lane southbound between the M25 to A13, the routing and structures through the Mardyke and reducing the height of the LTC where it crosses North Road).
- The area around the A127 with the M25 junction 29 (changes include: moving and shortening some lanes around the junction and raising Franks Farm bridge).

### Previously proposed Tilbury junction

**Q1c.** Do you support or oppose the removal of a dedicated rest and service area and maintenance depot for the Lower Thames Crossing, the junction at Tilbury and changes that result from this? Please refer to chapter 3 of the guide.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q1d.** Please let us know the reasons for your response to Q1c and any other comments you have on the removal of a dedicated rest and service area and maintenance depot for the Lower Thames Crossing, the junction at Tilbury and the changes that result from this.

With the removal of the services at Cobham and without the proposed service area at Tilbury, the closest alternatives between Dover and the M25 would be Farthing Corner at Gillingham and South Mimms in Hertfordshire. It is not clear therefore what the services strategy for the new link will be, which is of significant concern to this authority. Thurrock Services are an alternative, but require use of the Dartford Crossing. This is a wider issue than just the provision of services as it has implications for lorry parking which is a major issue across Kent.

In addition, the complete removal of the junction arrangements at Tilbury would appear to preclude any direct connection in the future between the Lower Thames Crossing and Tilbury Docks. The just issued Road Investment Strategy 2: 2020-2025 appears to include a Tilbury Link Road so clarification is sought on what exactly is being proposed and its wider implications. Should the scheme be built, this would seem to be rather short sighted given the strategic nature of Tilbury Docks and the investment being brought forward in the area.

**A13/A1089 junction**

**Q1e.** Do you support or oppose the proposed changes in the area around the A13/ A1089 junction? Please refer to chapter 3 of the guide.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q1f.** Please let us know the reasons for your response to Q1e and any other comments you have on the proposed changes in the area around the A13/A1089 junction.

The proposed junction provides inadequate connectivity to the west with Thurrock and East London via the A13 reducing the attractiveness of the Lower Thames Crossing as an alternative to the Dartford Crossing. This poor connectivity is likely to mean that the economic benefits of such a crossing will be overstated, as will its contribution to wider network resilience. Comments under question 1h below also apply along with the comment in RIS2 in the answer to Q1d.

**Lower Thames Crossing and its junction with the M25**

**Q1g.** Do you support or oppose the proposed changes in the area around the Lower Thames Crossing and its junction with the M25? Please refer to chapter 3 of the guide.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q1h.** Please let us know the reasons for your response to Q1g and any other comments on the proposed changes in the area around the Lower Thames Crossing and its junction with the M25.



The key change here is the omission of the third lane southbound between the M25 and the A13 based on updated transport modelling. In the absence of a full updated transport modelling report, rather than a short summary document, it is not possible to comment in a meaningful way as to whether this change has been properly justified. It is assumed that this has only been considered under normal operating conditions, based on low inputs that do not fully take into account levels of growth required by Government. The Council would question therefore whether the assumptions underpinning the transport modelling are sufficiently robust to make such a change and would like to see the evidence.

Furthermore, one of the scheme objectives is to improve network resilience and the promoter has based the case for Lower Thames Crossing, to a large extent, on the basis that providing an alternative route option provides such resilience. However, this will be illusory if insufficient capacity is built into the system to cope with incidents with the third lane removed. The most likely form of incident that would require a diversion from the M25 via Lower Thames Crossing would be an accident on the M25/A282 or closure of the Dartford Bridge due to high winds etc.

Given closures of the crossing due to high wind are likely to increase over time due to climate change, the effect of such an incident on network flows should be tested on the basis of more realistic development totals throughout the fully modelled area and be adequately consulted upon before any decision is made to remove the third lane.

**M25 junction 29**

**Q1i.** Do you support or oppose the proposed changes in the area around the M25 junction 29? Please refer to chapter 3 of the guide.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q1j.** Please let us know the reasons for your response to Q1i and any other comments on the proposed changes in the area around the M25 junction 29.

No comments.

**2. Revised development boundary**

Since statutory consultation we have continued to develop our proposals and modify the area of land that may be required to enable construction of the Lower Thames Crossing, and to provide mitigation for some of the impacts of building it. This is called the revised development boundary. Some of this land would be required permanently, while other areas would only be required on a temporary basis. Please refer to chapter 4 of the guide.

**Q2a.** Do you support or oppose the changes to the proposed area of land that would be required to build the Lower Thames Crossing?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know
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**Q2b.** Please let us know the reasons for your response to Q2a and any other comments you have on the proposed changes to land that would be required to build the Lower Thames Crossing. This includes feedback on the impact the project would have on any land that you own or have another legal interest in.

The area covered by the red line boundary of the project in Gravesham has increased substantially (over 30%) to include additional land (in particular) around the southern tunnel portal; south of the A2 to allow for utility diversions at Ashenbank Wood (SSSI/Ancient Woodland/part of Grade II\* listed historic park and garden); at Jeskyns Community Woodland; and onto farmland to the west of Henhurst Road at Ifield and to the east of Thong Lane.

Some of this land is for temporary occupation whilst works are undertaken; some for permanent retention of subsoil rights for utility diversions; and some for permanent retention of land occupied by highway or mitigation planting.

Notwithstanding the inadequacies of both the PEIR and current Supplementary Consultation in terms of setting out likely significant environmental impacts based on evidence, it is likely that the revised scheme would result in higher levels of temporary and permanent harm than even the scheme as presented prior to the preferred route choice.

Some of the additional land-take is the result of an additional utility diversion that was not identified either in the 2016 consultation or at the 2018 Statutory Consultation. The Council is extremely concerned that the presence of the medium pressure gas main appears to have been missed previously, given the implications of its existence should have been taken into account when Government made its preferred route choice in 2017 and subsequently. The promoter has also omitted sites along Thong Lane / Gravesend Road without setting out evidence to show they will not be harmed, as such the extent of the redline boundary may still need to be expanded and alternative provision made for existing uses. Particular attention is drawn to the Gypsy and Traveller site in fairly close proximity to the portal site on Rochester Road. We are aware that north of the river in Thurrock, Highways England has “identified two potential locations for the relocation of the traveller’s site”. One is adjacent to its current location with access off Long Lane, the other is further to the west along Long Lane opposite the junction with Kerry Road” and we would want the project team to consider similar arrangements in Gravesham.

As such, the Council cannot support the change in the red line boundary in the absence of a detailed appraisal of the implications of the additional land take required south of the A2 for the utility diversions and a reassessment of the proposal against reasonable alternatives – including (firstly) alternative route choices and (secondly) a comparison of the relative harm of the Eastern Southern Link compared to the Western Southern Link (the current scheme) from the 2016 consultation. This should clearly have been produced alongside the Supplementary Consultation given the scale of the changes in the Supplementary consultation which materially alter the environmental impact. This is considered to be a serious omission.

In terms of the additional land-take around the southern tunnel portal, insufficient

information has been provided on potential impacts as a result of construction activity and subsequent mitigation.

For example, in terms of cultural heritage, very little information has been provided to date on archaeological potential – particularly in relation to the area of land the construction site would extend over east of Thong Lane. Elsewhere, it is understood that there may be archaeological potential but it is very unclear how this has informed where construction sites or temporary spoil heaps would go.

On the basis of the information provided it is also unclear what the impact of the construction sites on nearby residents would be and this makes it extremely difficult for the Council to comment on either the acceptability of their location, scale or operation. For the avoidance of doubt, the Council will not support any extension to the red line boundary that would result in activities leading to an unacceptable adverse impact to sensitive receptors - human or otherwise.

It will be for the promoter to produce substantive and convincing evidence that there will not be unacceptable adverse impacts based on the precautionary principle – if in doubt, rule it out.

The issue of the use of temporary spoil heaps to reduce HGV movements during the period of construction is dealt with under Question 5 below.

Much of the permanent land-take and extension to the red line boundary relates to mitigation. However, in the absence of evidence as to the scale and form of impacts and how the scheme of mitigation has been designed to address these in a coherent way, the Council cannot agree to the red line boundary. It is unclear what the logic of the areas is both in terms of what they are mitigating or compensating for and what they will achieve in their own terms.

Previous comments made by the Council in respect of this have pointed out the need to understand the multi-layered significance of landscape and the way it has developed in historic context and to design mitigation accordingly. The sensitivity of this location to inappropriate and ill-thought out interventions cannot be overstated.

Another issue that needs to be addressed is land use and permanent retention of land on the viability of farm units and practicality of agricultural production. Where is the evidence on this and how has this informed both the red line boundary and what appears on the plans? Again, the Council would not wish to support the red line boundary until such time it has a clear understanding of this aspect.

The other area where the red line boundary has changed relates to the 5.8m diameter pilot tunnel running between Lower Higham Road and the Metropolitan Police Firing Range. This aspect will be dealt with in further detail below.

It is noted that part of the land to be acquired by the promoter is currently owned by the Council and forms part of the Cascades complex. This will need to be the subject of detailed discussions with the Council's Property Services department to determine the way forward and to ensure that any agreement facilitates the proper planning of the area and the delivery of the Council's corporate objectives.

### **3. Walkers, cyclists and horse riders**

Since statutory consultation we have carried out further analysis on how we can maintain, improve and upgrade the walking, cycling and horse-riding network in the area affected by the Lower Thames Crossing. We have also been looking at improving access routes for pedestrians and cyclists to public transport. Please refer to chapter 5 of the guide and the Map Book1: General Arrangement.

**Q3a.** Do you support or oppose our proposals for walkers, cyclists and horse riders?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q3b.** Please let us know the reasons for your response to Q3a and any other comments you have on our proposals for walkers, cyclists and horse riders.

It is extremely important that the needs of non-motorised users are properly addressed as the scheme is developed, for both the construction and operational phases. Closing down all routes crossing the scheme for the duration of construction is not an option that this Council could support. Opportunities to walk, cycle or ride a horse should be improved or at least be made no less commodious as a result of the proposal in the interests of prioritising more sustainable modes of transport; to support recreational use of the countryside; and healthy active lifestyles. Where routes are severed or made less commodious as a result of the proposal, this will require special justification and adverse impacts mitigated or compensated.

The removal of the footbridge shown over the cutting south of the tunnel portal on the alignment of footpath NG7/NG9 is logical given the movement of the portal 350m to the south. Whilst this would require a diversion resulting in a more circuitous route, it would be safer than the alternative. However, such a change needs to be based on a greater understanding of the wider network of footpaths in the vicinity, their significance as historic routes, and their actual use/utility. Because of the length of period of construction, there will also need to be agreement with both the Borough and County Councils on the provision of alternatives in that period.

Footpath NG8 running from Thong Lane to the vicinity of Chalk Church will also be affected by the proposals and require diversion. This is an important and popular route, allowing access to the wider footpath network in the countryside west of Shorne. Once again, a temporary diversion will be required to provide a reasonable alternative.

The proposed Lower Thames Crossing will sever two key footpaths to the west of Thong, where they pass through open farmland.

- Footpaths NS167/174 forms an important route from the A2 at Gravesend East through Thong and onwards towards Shorne Woods Country Park.
- Footpath NS169 forms an equally important route running from Michael Gardens at Riverview Park to join with NS167 on its eastward journey through Thong onwards to Shorne Woods.

Whilst NS169 follows in part the alignment of one of the dispersal routes of the old RAF

Gravesend aerodrome, the route appears to be far more ancient. The original public highway from Thong to Gravesend ran from Thong Lane westwards along what is now footpath NS167 before running to the north-west to link up with Whitehill Road. Whilst this route has been severed by the development of Riverview Park, it appears to continue further to the north in the form of footpath NG11, which crosses The Warren at an angle before joining the public highway at the junction of Valley Drive with Livingstone Road.

This would have been the historic route between Gravesend and the River Thames and Thong, from whence it would have been possible to progress southwards down Thong Lane towards Cobham Hall and the Darnley Estate. The footpath network here therefore should be considered as integral to a wider historic managed landscape that contributes towards the significance of the Thong Conservation Area as a designated heritage asset.

This will need to be taken into consideration in terms of the acceptability of diverting these footpaths to the south east, over the proposed Thong Lane green bridge.

The rerouting of National Cycle Route NCR177 is a matter of some concern given that the alternatives are far less commodious. The current route is hard surfaced and benefits from borrowed lighting from the A2 where it runs adjacent to it between Gravesend East to Brewers Road. It is an extremely popular route and is useable by road bikes, walkers and runners in all weathers and at night. It is unclear what surfaces are proposed on the alternative routes south of the A2, which would need to be reached only after crossing and re-crossing the A2, and whether they would be useable in the same way.

To the north of the A2, the section of NCR177 that runs between Thong Lane and Brewers Road appears to be lost as a result of the proposals. It is suggested here that consideration should be given to whether this could be replaced through the edge of Shorne Woods Country Park, subject to a consideration of environmental impacts on the SSSI/Ancient Woodland.

The promoter is also proposing that as part of the diverted NCR177, part of footpath NS179 running between Halfpence Lane and Park Pale to the south of the A2 should be upgraded as a footpath/cycleway. This route may also be used to facilitate utility diversions. A key consideration here is that this footpath effectively forms the boundary to the Grade II\* Cobham Hall registered park and garden, with the area in the immediate vicinity of Repton's Ponds and the Grade II listed pump house being particularly sensitive.

Any adverse impact on the significance of the designated heritage assets would be a material consideration, remembering that this would be in addition to the harm already caused by the construction and operation of HS1. The Council's initial view on this is that this should be avoided and reasonable alternatives considered.

It is considered that the Lower Thames Crossing would have a detrimental impact on non-motorised users both in the short term during construction and in the longer term during the operational phase. This will need to be mitigated and compensated as part of a wider package of improvements, which could also include off site works improving opportunities to walk and cycle within the adjoining urban area. In addition, consideration should be given to providing opportunities for mobility impaired people to make use of the public rights network in the vicinity as a positive benefit of the scheme by way of compensation.

#### 4. Environmental impacts and how we plan to reduce them

In the guide we have provided an overview of how the proposed changes affect the preliminary environmental information that was presented in our statutory consultation. Please refer to chapter 6 of the guide and our Environmental Impacts Update document.

**Q4a.** Do you support or oppose the change to the environmental impacts of the Lower Thames Crossing

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q4b.** Please let us know the reasons for your response to Q4a and any other comments you have on the environmental impacts of the changes to the Lower Thames Crossing.

Whilst a number of the proposed changes are welcomed, the Council and other stakeholders are in the position that they cannot fully understand the nature and scale of significant environmental impacts because the promoter has failed to publish sufficient evidence and analysis at the appropriate time.

This makes it impossible to make sense of the mitigation package in the immediate area of the proposal because it is unclear what is being mitigated and why, or what is intended to be compensation to offset impacts elsewhere and why it is being done at a particular location. The Council would also make the point that compensation planting that is not required to mitigate direct impacts need not in itself take place in the immediate area of the project itself, and that there may be alternative locations within the Borough which are more appropriate for consideration.

Bigger net gains might be achieved if this was done elsewhere or in a different form in accordance with a blue/green infrastructure strategy for a wider area than the redline boundary and the promoter is invited to work with the Council on developing such an evidenced based strategy towards which this project could contribute.

On this, attention is also drawn to Table 16.8 of the PEIR dealing with the climate change impacts of the scheme and how it is intended to deal with the issue of carbon management – including embodied carbon. The commitment here in terms of mitigation states that the promoter will seek to reduce the carbon footprint of the project by taking the following actions:

- **Avoid and prevent:** maximise potential for reusing or refurbishing existing assets to reduce the extent of new construction required.
- **Reduce:** apply low carbon solutions (including technologies, materials and products) to minimise resource consumption during construction. Construct efficiently, using techniques that reduce resource consumption over the construction phase of the project.
- **Remediate:** after addressing steps 1 and 2, the Project will identify, assess and integrate measures to further reduce carbon through on or off-site offsetting or sequestration.

Unfortunately, at the present time, the promoter has not published an assessment of the

total carbon footprint of the project or the steps that will be taken to remediate it in accordance with the commitment in the PEIR. On 25 June 2019 Council adopted a resolution declaring a climate emergency, which included a commitment to work with partners to deliver carbon neutrality.

It is also noted that the recent Appeal Court ruling on the National Policy Statement for Airports has implications for the National Policy Statement for National Networks. As this was given on 27 February 2020 this consultation could not take this into account, however the DCO submission will need to examine the implications of climate change policy on the proposal.

This is needed to at least identify and negotiate an appropriate scale of package, which could include an approach to blue/green infrastructure as set out above along with a commitment to fund other carbon offsetting measures, including a commitment to fund off-site improvements to the local walking and cycling network in the local area to encourage sustainable alternatives to the car; a scheme to improve ferry services between Gravesend and Tilbury, which could include a change to electrical propulsion in line with the PLA strategy to achieve a zero-carbon river and provide an alternative to road based trips; or even assistance for the Council to reduce its own organisational carbon footprint to offset that of the project itself. The project itself, PROW impact matters aside, has no proposals to address improvements to public transport.

The new plans include three significant new areas of mitigation planting at Chalk Park, Ifield and adjoining Brewers Wood. The disposal of spoil on site and the need to compensate for the potential loss of ancient woodland are the logical reasons for these proposals but it is not clear what they are specifically designed to achieve in terms of mitigation and compensation. There are potential landscape, nature conservation and historic environment impacts as well as benefits from these proposals. Chalk Park in particular has implications for local residents from its construction as well as the land use and related issues on the east side of Thong Lane.

It is suggested that all of the above be discussed with the Council as part of a wider package of mitigation, alongside compensation to the community to offset the impacts of the scheme during construction and operation and mechanisms by which local people can take direct advantage of employment and training opportunities associated with the project.

The Council would wish to express major concern about the proposed 5.8m diameter pilot tunnel running from Lower Higham Road to the Metropolitan Police Firing Range under the marshes. These works are clearly non-trivial and have been introduced at a very late stage. Whilst the length of tunnel is not long, the diameter actually exceeds that of the Northern Line extension in London, which seems excessive (in terms of spoil generated) for the function it is designed to achieve.

As an engineering work proposed beneath an environmentally sensitive area (Ramsar/SSSI) this would require EIA/HRA in its own right, irrespective of the rest of the proposal. It is unacceptable therefore that the environmental information and evidenced based assessment of impacts within the Supplementary Consultation is so cursory. The precautionary principal has to apply until substantive evidence is available.

Similar criticisms can be levelled at the proposed utility diversions to the south of the A2 in the Shorne-Ashenbank Wood area – i.e. part SSSI/ancient woodland/Grade II\* registered

park and garden. Once again, in the absence of a proper environmental impact assessment which clearly sets out the implications, it is not possible to make comments on whether or not this is acceptable or proposed mitigation is adequate. As is set out under question 6 below, the Council considers that alternative options should be considered and an objection in principle is raised against this element of the works. Similar incursions into Shorne Woods SSSI to the north of the A2 will also be resisted.

Finally, it is noted that it is proposed to stockpile spoil arising from construction activities on site and to dispose of this later once the Lower Thames Crossing opens. The reason for this is stated to be to reduce HGV movements and therefore impact on local people and the road network. However, details on what this may mean in terms of impact and the alternative options have not been clearly set out in the Supplementary Consultation and it is not therefore possible to make a judgement on whether this is acceptable or proposed mitigation acceptable. Noise, dust and HGV movements will be issues over a significantly longer period than the six year construction period. It should be noted that there are opportunities available during the construction of the project to make better use of the river to remove spoil, utilising such an approach would reduce HGV movements on the main network and allow for greater amounts of spoil to be removed during the construction phase. Consideration should therefore be given to enhancing access to the Denton area (i.e. Wharf Road) from Gravesend Road to remove spoil via river.

Further, the proposal to dispose of material on site (in the order of 1m cu<sup>3</sup> from the information given to Members at their briefing) rather than take it away has the potential to compromise the future planning of the immediate area and to potentially compromise the delivery of development required by Government and the local community. Further consideration of this aspect is required and the promoter is requested to work with the Council on the development of a masterplan for the area that has regard, not only for the needs of the promoter to dispose of waste, but the wider needs of the local community which would include addressing the harmful social, health and wider impacts of the development through more things just than open space. In this respect, the promoter will also be aware that the Council is also an important landowner affected by the scheme and not just the local planning authority.

## 5. Building the Lower Thames Crossing

Following feedback from our statutory consultation and as our project design has developed, we have been updating our plans for how to build the Lower Thames Crossing. This includes our proposed working hours, plans for temporary road closures and traffic management, the proposed location of our construction sites and impacts on the roads leading to our construction sites. Please refer to chapter 7 of the guide.

**Q5a.** Do you support or oppose our revised proposals for how we plan to build the Lower Thames Crossing?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q5b.** Please let us know the reasons for your response to Q5a and any other comments you have on our revised plans for how to build the Lower Thames Crossing.



The consultation contains no proper explanation of how the project will be constructed in the round or how impacts over a considerable period of time will be mitigated and those affected (local community, businesses and others) will be compensated. Neither has the promoter published a draft Construction Environment Management Plan (CEMP), Code of Construction Practice (CoCP) or relevant parts of the draft DCO to make comments on. Timescales for some elements have been mentioned but no overall programme to assess the cumulative impacts from the multiple activities and their inter relationships.

Although general hours of working are provided and the probable locations of construction sites, greater level of detail will be required where construction sites and actual works are in close proximity to sensitive receptors. It is noted that the working hours have changed from those in the 2018 consultation:

<b>Proposed working hours</b>	<b>2018 Statutory Consultation</b>	<b>2020 Supplementary Consultation</b>
Mid week	08:00 – 18:00	07:00 – 19:00*
Saturdays	08:00 – 16:00	07:00 – 16:00
Sundays	n/a	n/a
*During the summer months it is proposed that earthworks could be undertaken from 07:00 – 20:00		

Blanket hours are only a starting point since the noise generated by particular activities and their location is significant. Residents of Riverview Park and Thong will be subject to different impacts than in locations with no residential property, and no information has been provided on this. The proposed CEMP will need detailed discussions with the Council’s Environmental Health officers on this issue.

Details will also be needed on how construction sites will be prepared for use and serviced; the minimum separation from sensitive receptors and how any potential adverse impacts will be controlled and mitigated; and how such sites will be remediated following their no longer being needed – which may be prior to the relevant contract being completed. Where the occupation of the land is temporary, the future use of the land will need to be agreed unless it is being returned to the original landowner under Critchel Down rules and/or it is intended that the existing lawful use of the land will resume.

It should not be assumed that the core hours of working (including start-up/shut-down/maintenance periods) will be acceptable across the project as a whole because of locally identified sensitivities. Equally some highway works on the existing A2 can probably be only undertaken at night, especially where road closure is required. This and a range of other aspects will need to be agreed on an area by area basis with the Council to ensure that impacts are reduced to an acceptable level. The Council will expect such provisions to be included in a requirement in the draft DCO with the wording of this to be agreed prior to submission.

In any event, the Council wishes to raise the issue of the proximity of some of the proposed construction sites/workings to occupied residential properties and questions whether this is appropriate in principle – for example the proximity to residential properties

to the east of Thong Lane, along with Polperro and the travellers' site on Rochester Road. As mentioned earlier, consideration should be given as to whether or not these properties should be included within the red line and whether alternative provision should be made for some properties such as the traveller site.

Details of who will be responsible for or have the locus to enforce the provisions of the CEMP or other environmental protocols will also need to be clearly set out and the legal basis for doing so. Will there be the necessary powers for the Council to enforce if necessary, and in what areas, included within the DCO?

Given the Council is likely to incur additional expenditure as a result of monitoring the project; liaising with contractors and the client; and in taking actions against non-compliance, a contribution towards costs will be required under the s.106 attached to the DCO. This will need to be agreed prior to submission.

It is taken as given that the draft CEMP will include provisions for a dedicated telephone number/contact details for the public to make complaints where issues arise during construction. A response time to investigate and act on complaints should also be included, along with details of the person responsible for compliance. An on-line log should also be maintained detailing complaints and actions taken, with this being updated in a timely manner as set out in the CEMP. This will allow the Council to monitor whether or not there are particular issues that need to be addressed with less-frequent on-site visits.

The issue of the 5.8m diameter pilot tunnel has already been raised under question 4 above. The scientific and engineering principles underpinning the proposal are not explained in a satisfactory manner. An additional tunnel close to the surface appears to risk greater disturbance to the hydrology of the Marshes than the main tunnels. The injection of 'grout' into boreholes will presumably introduce chemically and physically 'foreign' materials into the geology. The back-filled tunnel will remain as a permanent, not temporary, incursion into the geology even if the backfilling is from the extracted material. It is very unclear whether such an intrusion can be reinstated in a neutral way.

The marshes are a fragile environment which requires careful management to enable it to perform its key International nature conservation role – whether it is in the Ramsar/SPA or not. The precautionary principle has to be applied until such time as there is evidence to the contrary.

The introduction and extraction of a Tunnel Boring Machine (TBM) and associated shaft works will increase the overall impact of construction works above ground with associated movement of vehicles and spoil, and noise and air quality impacts. Altogether there is insufficient information about the environmental impacts of this additional component of construction and the efficacy of any mitigation measures that may be required.

The proposed works being on the surface or shallow depth also risk disturbing archaeological deposits that have been preserved in the wet environment. Very careful work will be needed before any work starts to establish what is present.

The issue of disruption to the Public Rights of Way (PROW) network has been raised elsewhere. However, it is noted that construction will require significant use of routes across the east side of Gravesend, with this potentially extending beyond the construction period depending on the approach towards spoil use and disposal.

Whatever the final outcome, this will require careful management because the area already suffers from significant congestion at peak periods in particular. Until the scale of this is clear (and in combination with what is happening elsewhere) it is difficult to make further comment on the available information. A Transport Plan (either free-standing or as part of the CEMP) will however be required.

The Council is not responding on the question as to the location of the electricity sub-station as a substantial and permanent above-ground structure. Insufficient information has been supplied as to what precisely is being proposed; why it has to be this size; whether there will be any external lighting or noise emissions from electrical equipment. It is not therefore possible to determine what the potential impacts may be on sensitive receptors, including the setting of St Mary's Church as a designated heritage asset. The presence of any archaeology will also be a material consideration in choosing the most appropriate location, as will its impact in landscape and Green Belt terms. The Council will also expect any such compound and equipment to be appropriately screened and incorporated into a wider approach to landscape planting.

## 6. Utilities

Since statutory consultation, we have been progressing our discussions with utilities companies and other stakeholders. We now have a more detailed understanding of the potential land requirements and utilities works that would need to be undertaken to ensure the Lower Thames Crossing can be built safely. Please refer to chapter 8 of the guide and our Utilities Update document.

**Q6a.** Do you support or oppose our revised proposals for the utility works required to build the Lower Thames Crossing?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q6b.** Please let us know the reasons for your response to Q6a and any other comments you have on changes to the utility works proposed for the Lower Thames Crossing. When responding to this question, please identify the section of utility works you are referring to.

Whilst the Council faces difficulties in understanding the environmental impacts of the project due to the lack of detailed information and analysis provided, it is appreciated that the promoter is trying to minimise negative impacts on people and the environment as far as is practicable.

Unfortunately, the current proposals in introducing what appear to be extremely damaging utility diversions into environmentally sensitive areas to the north and south of the A2, to the east of Thong Lane, are clearly a retrograde step that the Council cannot support in the absence of robust and convincing evidence.

As noted elsewhere, the need for such diversions should have been identified prior to the preferred route choice in 2017 and certainly at the time of the Statutory Consultation in 2018 and factored into the consideration of reasonable alternatives. The Council is far from convinced that the current proposals would have been progressed if this had taken

place and an explanation of how this has occurred is required.

For the avoidance of doubt, the Council would not wish to see utilities diversions being placed under the feeder roads to the north or south of the Strategic Road Network at this point because at some stage there is likely to be a need to access them to repair or upgrade. This would cause severe disruption to the highway network and problems elsewhere that would impact adversely on the local community and business.

Neither can it agree to the proposed incursions into environmentally sensitive areas, such as the Shorne - Ashenbank Woods SSSI, on the basis of the case set out in the Supplementary Consultation. The Council would also be surprised if the affected Statutory Undertaker would agree to such a diversion given the complications that would arise in attempting to undertake repairs or to upgrade or replace the equipment in future.

On this, it is assumed that in terms of gas pipelines the permitted development rights set out in Schedule 2, Part 15, Class A to the Town and Country Planning (General Permitted Development)(England) Order 2015 would not apply where EIA is required due to the effect of Article 3.

It is suggested therefore that the promoter should consider whether less environmentally damaging alternatives exist that avoid such sensitive areas, even if the resulting route is longer – i.e. perhaps to the south of the SSSI etc. between Ashenbank Woods and Cobham village. The NPSNN makes it clear that impacts on Ancient Woodland should be avoided if at all possible. Whatever arguments can be made about the physical alignment of the various roads, there is no case for a utility diversion, which is much more flexible as to location, damaging ancient woodland.

## 7. Using the crossing

Since statutory consultation we have updated elements of our traffic model as part of our ongoing work to prepare for our DCO application. We have produced updated traffic flow diagrams (please refer to chapter 9 of the guide) and these are supported by a Traffic Modelling Update.

**Q7a.** Taking into account the updated traffic information included within the supplementary consultation, do you support or oppose the view that the Lower Thames Crossing would improve traffic conditions on the surrounding road network?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Strongly support	Support	Neutral	Oppose	Strongly oppose	Don't know

**Q7b.** Please let us know the reasons for your response to Q7a and any other comments on how the changes to the Lower Thames Crossing would affect traffic conditions on the surrounding road network.

The information supplied to date on the traffic impacts is insufficient to arrive at a proper view on the matter. The information in the Traffic Modelling update focusses on the year of opening 2027 and this gives a misleading impression of what will happen by the new design year of 2042. Yet again the development numbers inputted into the model do not reflect the realities of the development councils are being expected to deliver through their

Local Plans and the modelling does not represent a reasonable worst case. Whilst the approach taken currently may be sufficient within WebTag to support a Treasury Green Book compliant business case, as we have previously highlighted, it is not sufficient for EIA purposes or to make a judgement on whether the proposal truly supports regeneration objectives.

As noted elsewhere, there is also very little information justifying the proposal in terms of improved network resilience. This point has already been made in terms of the design change of the link north of the River Thames, with the reduction of the southbound section between the M25 and A13 from three to two lanes.

However, in order to understand how the southern section of the link will perform when incidents occur, it is also necessary to test what would happen if northbound flows became restricted and traffic blocked back to the A2/M2. How long would this take to clear; what would the impacts be on the wider strategic and local road network; how would the emergency services access an incident; and how would such a situation be managed and from where?

This aside, work undertaken for the County Council shows that significant issues exist on the network from the last round of modelling. This will need to be re-appraised in the light of the new modelling and from any updated modelling required to bring LTAM v2 in line with development levels being required by Government.

The Council is of the opinion that because Lower Thames Crossing is likely to induce increased road based trips across the strategic and local road network, the adverse impact of such an effect should be fully assessed and mitigated by Highways England and (ultimately) the Government. The cost of such works should not fall on local authorities within the area to address where it is the result of a project promoted by a Government agency.

The Council welcomes the commitment to equal charging on LTC and Dartford Crossings and a Local Residents Discount scheme. Clarity is sought on whether this, for Gravesham and Dartford residents, applies to both crossings. Alternatively is it just for the crossing located in the respective Borough? Since use of both applies to Thurrock residents it would be inequitable if this were not the case south of the river.

The Council is aware of suggestions that charging for HGV's should be differential to encourage use of LTC rather than the Dartford Crossing. The Council supports the overall logic set out in the bullet points on page 11 of the Guide to supplementary consultation. On the simplistic logic that HGV's will use the most direct route, it is going to require a differential charge that covers the additional time, fuel and other costs of a longer route. This will place additional burdens on the A2 west, and more specifically on M25 J2 in Kent. The lack of turning movements to the west at A13 junction with LTC also rules out movement seeking parts of Thurrock. The Council can see no merit in the proposal.

## **8. Other comments**

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

General comment on process and information: This Council has been consistent in its

comments on consultations to date that insufficient information has been provided by the promoter for either statutory consultees or the public to understand the community and environmental impacts of the proposals; how well the preferred option performs against scheme objectives and reasonable alternatives; or indeed whether the scheme will work at all.

This is particularly the case given the transport modelling upon which the scheme's development has been based relies on limited inputs rather than levels of development that reflect the Government's own growth aspirations for this area.

For example, that Government has committed to provide £170m for infrastructure improvements in Medway to support increased development on the Hoo Peninsula, when those levels of development do not appear to have been factored into the transport modelling undertaken thus far. This does not make sense when much of the additional traffic generated will join the Strategic Road Network in the immediate vicinity of the Lower Thames Crossing junction with the A2. The Council also has concerns about the inadequate modelling and the impacts being illustrated on existing A2 junctions such as Tollgate. The current Tollgate is known to be operating close to, if not at capacity at peak periods. Given that this was a recently built junction, it illustrates the impact of not taking into account future development requirements. Going forward, this Council would also expect Highways England to share and consult on details of the impact of construction and operation of LTC on Tollgate and other junction in the Borough, including what proposals will be implemented by Highways England to ensure that these junctions are able to operate effectively. This matter was brought up and agreed in broad terms in relation to the A2 Bean and Ebbsfleet Junction Public Inquiry.

Because an updated uncertainty log has not been published with the Transport Update Report and there are no meaningful outputs provided, it is not possible to ascertain whether similar concerns exist elsewhere to the north and south of the River Thames. The limited information provided in the documents relating to the revised year of opening is insufficient and a fuller understanding of wider impacts during both the construction and operational stages is required.

As the outputs from the transport model are used as key inputs into Environmental Impact Assessment, it is essential that a realistic worst case position is adopted in line with the requirements of Highways England's own internal guidance (DMRB LA104). This would appear to be entirely consistent with the Planning Inspectorate's advice set out within its response to comments made by Medway Council and others in its Scoping Opinion at chapter 4, under point 13.8.16.

The promoter will also be aware that a number of others made comments about the lack of information at Statutory Consultation in 2018 and their ability to make meaningful comments on the scheme as a result.

This has not been addressed within this Supplementary Consultation, where the paucity of information on significant environmental and other impacts is shocking. This is notwithstanding that the area covered by the scheme has increased considerably, including a need for utility diversions through environmentally sensitive areas, which did not feature in earlier consultations – including prior to the choice of the preferred option by Government or at the Statutory Consultation stage.

It is also self-evident that the environmental impact of the scheme itself has escalated with

the need to construct a 5.8m diameter pilot tunnel under the marshes (Ramsar/SSSI) and to stockpile spoil for later disposal once the crossing opens. The implications of neither proposal are properly explained within the consultation material.

In addition, because the environmental impacts of the proposal have not been properly presented in any meaningful way or in some cases at all, it is impossible to make a balanced judgement on the adequacy of mitigation and its appropriateness. This clearly also has implications for the promoter in terms of justifying compulsory purchase of land it wishes to acquire permanently for the purposes of mitigation.

The Council is therefore currently of the view that the promoter has failed to comply with legislative requirements on consultation and the commitment it made within the published Statement of Community Consultation (SoCC). Also, because the impact of the scheme does not appear to be based on an agreed realistic worst case, it is difficult to see how the requirements of the relevant EIA Regulations would be met in terms of robustly identifying significant environmental impacts.

The promoter is therefore urged to address the Council's concerns given that they are likely to result in the issuing of an adverse Adequacy of Consultation response on submission of the DCO application and the validity of any Environmental Statement being called into question. In the interim, it is intended to contact the Planning Inspectorate to ensure that the Council's concerns become a matter of public record under s.51 of the 2008 Act.

The answers provided to the questions above should be read in the context of the incomplete information that has been provided by the promoter, having regard to the deficiencies in the consultation.

## 9. The consultation

Please let us know your views on the quality of our supplementary consultation materials, our events, the way in which we have notified people about our plans, and anything else related to this consultation.

		Very good	Good	Average	Poor	Very poor	Not applicable
<b>Q9a.</b>	Was the information presented clearly and easy to understand?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Q9b.</b>	Were the events of good quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Q9c.</b>	Were the events suitably located?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Q9d.</b>	Was the consultation promoted well and to the right people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Q9e.** Please let us know the reasons for your responses to Q9a – Q9d and any other comments you have on the delivery of this consultation.

The mechanics of the consultation process to date have involved significant publicity, holding of exhibitions and other events. Concern has been expressed by Members though whether the specific targeting has been adequately carried out on some issues, access to the Thames View Crematorium being an example.

What is missing is the information to support the consultation to enable the Council and the residents of Gravesham to understand not only what is being proposed, but why and what its impacts might be.

Furthermore, in the current circumstances, which could not be anticipated by any party, the understandable cancellation of consultation events and the closure of Gravesend Library with its deposit documents has curtailed the opportunities for local residents to understand the consultation and respond to it. The one week extension is not sufficient in the circumstances. Internet access is no substitute for seeing the plans and having them explained.