

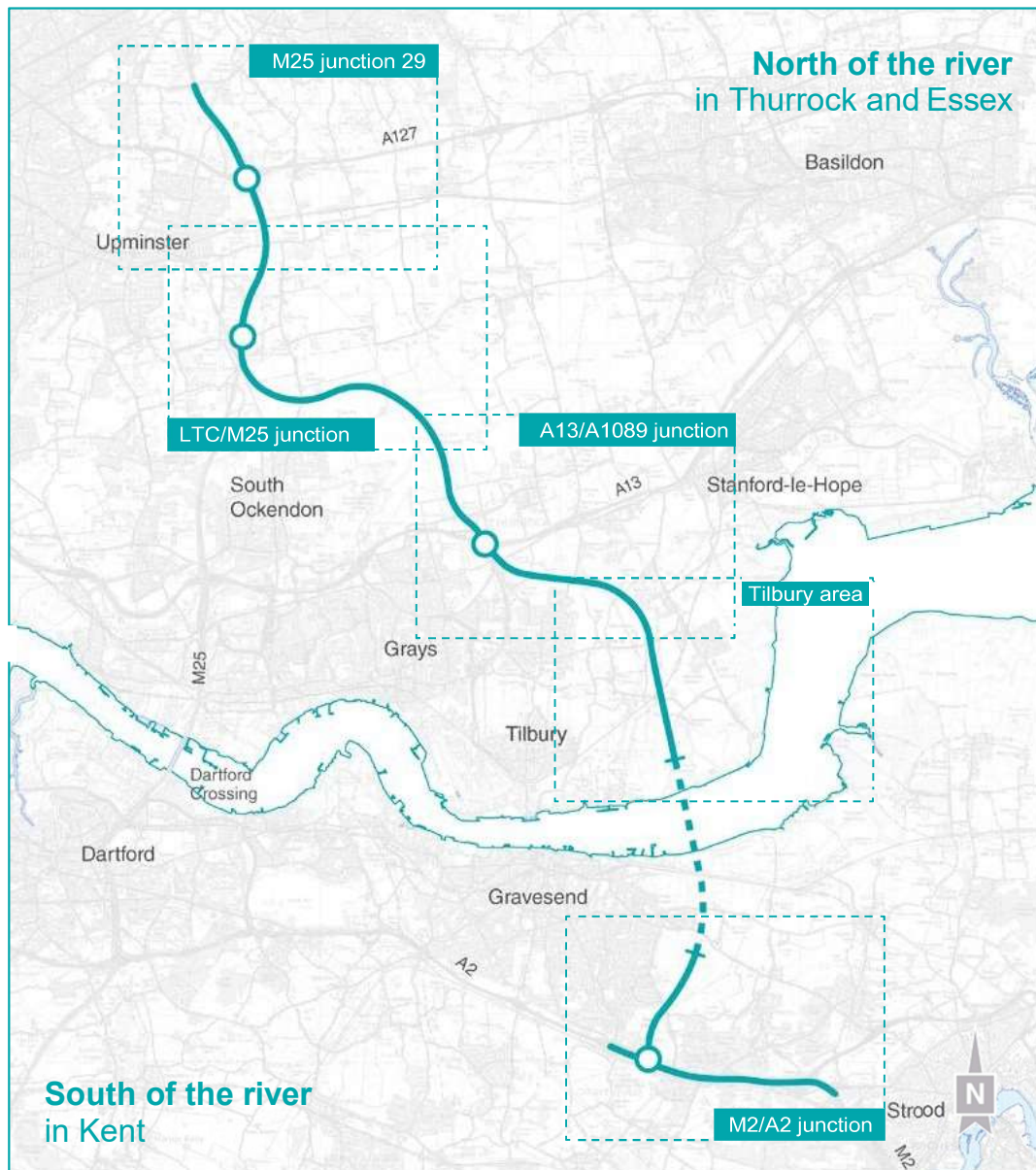
1. Design refinements

For the purposes of this design refinement 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.

The proposed refinements outlined in each section include changes to:

- highways
- utilities
- landscaping
- construction
- environment
- routes for walkers, cyclists and horse riders

A detailed description of our proposed refinements to the 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.

M2/A2 area proposals

The guide describes the proposed changes to sections of the M2/A2 around the junction with the Lower Thames Crossing. Changes include: refinements to Thong Lane green bridge over the A2 and the Lower Thames Crossing; a new electricity switching station at Thong Lane; further developed proposals for the ancient woodland mitigation and compensation planting; and landscaping proposals around the electricity substation at the southern tunnel entrance.

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

Please refer to the [Design refinements](#) chapter of the guide.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Strongly oppose	<input type="checkbox"/>
Strongly support	Support	Neutral	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.

The proposals in the consultation are dealt with in two ways. Firstly there is a table looking at the individual elements and secondly some overall observations. In the table the numbers refer to those used in the Guide on pages 26-29 or page numbers.

#	Where	Change as defined by Highways England (HE)	Gravesham Borough Council (GBC) Comment
1	East of LTC at Southern Valley Golf Course (SVGC)	Need permit to stockpile excavated clean chalk	No change on overall position where there is a major concern over precise location, duration, traffic impacts, noise, dust etc. and the need for this operation to be tightly controlled via the Code of Construction Practice (CoCP). The duration of this could be up to 9 years overall.
2	Thong Lane Green bridge	Green bridge moved 20m north and raised by less than 0.5m	Consequence of the road level rising. No cross profile to allow comparison. Critical point for ecological connectivity as well as travel in various forms. As highlighted by Kent County Council (KCC) is there a further opportunity to avoid the demolition of the former LCC properties that are part of the Thong Conservation area
3	East of Thong Lane Green Bridge	New informal car park	Shorne Woods Country Park has an issue with car parking along Brewers Road and Park Pale both due to capacity and charging. This proposal is east of Thong Lane just south of green bridge and off an access track (to the drainage ponds) and a footpath. This will attract traffic, though it is most

#	Where	Change as defined by Highways England (HE)	Gravesham Borough Council (GBC) Comment
			attractive to Gravesend residents due to its location. Management is unknown, including whether charged for etc. As well as traffic it has implications for landscape and planting. The continual problems with Highways England lorry park at Marling Cross are a local example of what happens if such a facility is not proactively managed.
4	LTC SW of Thong Lane Green Bridge	Road level raised by 2-3m	Map Book 3 (sheets 3a & 5) are relevant. Quoted ground level numbers (not profile) was incorrect in the Supplementary Consultation. Established that cutting still hides vehicles as it is deeper than 4.5m (not so further south at the A2 junction). However as a consequence lighting columns (12-15m) and sign gantries (at least 7m+) will be higher, and therefore potentially increase light pollution. The shallower cutting should reduce spoil quantity which is a positive. It is also the point at which two noise barriers are being suggested – is this as a result of this proposal or is it required anyway? Environmental Impacts Update simply says effects are as set out in Preliminary Environmental Impact report (PEIR) without further explanation.
5	South Riverview Park west of LTC	Relocation of Claylane Drainage Pond	Pond adjoins Gravesend East to LTC slip – remains roughly in same position but has changed shape and now has maintenance access track off slip road to it.
6	Thong Lane A2 bridge	Moved 5m west and green space consolidated	Small scale alteration in itself. The green element is small and it is not clear how this contributes to visual or ecological connectivity north to south across 15 lanes plus 2 way link road and HS1.
7	West of Halfpence Lane HS1 tunnel	20m long 2m high retaining wall between HS1 and local link road	Environment Impact Update says 20m long and 2m high and Map Book 1 locates it as described. However see comments on figure 3-4 below. Introduces further element of urban development – may be visible from Jeskyns Community Woodland (Jeskyns) along HS1. Precise location not clear on the plans since the label does not appear to point to anything

#	Where	Change as defined by Highways England (HE)	Gravesham Borough Council (GBC) Comment
			other than the side of the new link road.
8	Brewers Road bridge	Moved 6m east and green space amalgamated	Small scale alteration in itself. The green element is small and it is not clear how this contributes to visual or ecological connectivity north to south across 12 lanes plus HS1.
9	East of Thong from A2 to A226	Upgrade to existing electricity overhead power lines	Not clear precisely what is involved but two pre-existing lines on wooden poles run about 150m east of 400kV from A226 to A2. They skirt the Kent Downs Area of Outstanding Natural Beauty (AONB) and run east of Thong and then cross to the west side of Thong Lane. They then run south to a substation on the A2, for which is logically being replaced by the new 33kV proposal. There is an opportunity to underground these lines completely, subject to any archaeological constraints
10	Thong Lane north of A2	New 33Kv permanent switching station (Note: a switching station is a substation without transformers and operating only at a single voltage level)	A new proposal facility for which no design is provided. Some idea is provided on possible highway access. Would be approximately 50 m long x 15 m wide. Supports the other smaller substations along A2 and LTC (see p.25 entry below). The Guide says “we do appreciate, however, that there would be a visual impact and we will continue to work with our stakeholders to determine how this can be minimised”. The facility is located on the edge of the AONB on a currently undeveloped part of Thong Lane. It introduces yet another urban feature into the landscape and in the Green Belt. Not clear if it is an open structure (e.g. as HS1 feeder at Singlewell) or a building. It will be important to understand exactly what function it performs and why it needs to be located in this location.
11	Valley Drive	Extension of gas main north along Valley Drive	35m extension – main issue is implication of construction on Valley Drive traffic flow and for 2 extra properties on Valley Drive and 4 in McKenzie Way (at a lower level). Need some form of construction plan to see how significant and understand impact of works on Marling Cross A2 Junction
12	South of Riverview	400Kv line moved 235 m south	Major alteration in location though line

#	Where	Change as defined by Highways England (HE)	Gravesham Borough Council (GBC) Comment
	Park	from Statutory Consultation location but only 90m from current alignment	is already in existence. The moving of the zig zag over LTC some 300 m south west inevitably increases visual clutter for the Thong Conservation area although an advantage for Riverview Park residents. (The requirement with utilities is to ideally cross at 90° to main carriageway). Needs more detail to understand implications of the proposal.
13	Proposed electricity substation on A226	Landscaping proposals Also tracks of maintenance access (not available for public use) to tunnel portal. There is also mention of a tunnel control building,	Highways England has selected option 2 from the Supplementary Consultation and is now developing proposals. No illustration of what is actually involved though previous material said 50x50m in size. Detailed design and landscaping unknown. Need to take account of being next to Viewpoint traveller site, as has been pointed out on previous consultations, in relation to a number of issues.
14	South of Riverview Park	Replacement woodland planting taken away from Clay Lane Wood and put along urban edge	KCC Ecology advice is that whilst the woodland strip is welcome it is thin, next to the noise and disturbance of the urban area and depends in part on Thong Lane green bridge for linkage further east. Initial view is that insufficient justification given for compensation planting not being closely related to location where irreplaceable ancient woodland is being lost The ancient woodland at Shorne Wood is geologically on clay/sands etc. that overlay the chalk whereas this area is chalk.
15	North side of Shorne Wood Country Park (Shorne Ifield Road).	Redesigned planting as ancient woodland compensation	Extends the woodland out beyond Shorne Ifield Road, does however follow contours compared with previous blocky approach. Does not seem to fit with an overall plan. Map Book 1 annotates the area east of Thong Village to Shorne Woods Country Park as "Potential receptor site for ancient woodland". The illustrations in figure 3-8 and 3-11 show the area as an open field. Which is correct as they have very different implications?
16	West of Henhurst Road and south of Church Road, Ifield	Reduction in woodland compensation due to reduced land take for utilities	The proposal still introduces new planting into an area that is currently open fields – although less extensive than previously, due to reduction in

#	Where	Change as defined by Highways England (HE)	Gravesham Borough Council (GBC) Comment
			<p>ancient woodland loss elsewhere. Southern boundary is a rectilinear zig zag. Only partially following existing field boundaries. Keeps planting away from St Margaret's Church, Ifield (Grade II) but comes across as a disconnected fragment.</p>
17	Shorne Woods Country Park	Less land take and additional landscaping	<p>Welcome the reduction in land area but this is counter balanced by the introduction of two noise barriers. The change does nothing to address the fundamental issue of the impact on the Ancient Woodland, SSSI, AoNB, historic significance and local walking and cycle routes in the locality which can only be classified as major negative. The current mitigation proposals do not start to address these impacts and a comprehensive package of mitigation and compensation is required.</p> <p>Shorne Woods has all you could ask for from a country park and is one of the most popular outdoor spaces anywhere in the region. See https://explorekent.org/activities/shorne-woods-country-park/</p> <p>Future of the Inn on the Lake hotel needs to be clarified both during the construction phase and in the long term</p>
18	Park Pale	Woodland compensation planting joining Brewers and Great Crabbles Woods	<p>More detail but as before in broad terms. The principle of joining the two woods in ecological terms has obvious attractions but then there are two footpaths proposed through it, which tend to operate in the other direction by introducing disturbance. What is this area meant to be functionally?</p>
19	West LTC south of Thong Lane land bridge	400m x 1m noise barrier.	<p>No clear technical explanation of why the noise barriers are needed. Only 1 m high – the Council needs to understand precisely why they are needed and how that relate (or not) to the height of the LTC being raised in the area. Welcome mitigation if needed but signified a significant negative impact on the noise climate.</p> <p>The Statutory and Supplementary Consultations made no reference to location of any noise barriers. PEIR says that they are a mitigation options and identifies this area as potentially</p>

#	Where	Change as defined by Highways England (HE)	Gravesham Borough Council (GBC) Comment
			needing such measures. Urbanising effect of the introduction of more structures.
20	East of LTC south of Thong Lane land bridge	350m x 1m noise barrier	As above though the receptors are located in Thong.
21	North side A2 east of Thong Lane A2 bridge	600m x 2m noise barrier	<p>Not clear what receptors are being protected by these as there are few in close proximity. The Inn on the Lake Hotel is in this area and its future remains an unresolved issue.</p> <p>As the PEIR says (table 13.16) “beyond 200-300m from a road traffic source, the effects of barriers are often negligible, as ground attenuation becomes the most significant factor”. As the land form rises up in general to the north towards Shorne Ridgeway this further illustrates the unsatisfactory nature of the impacts in this area that such a feature should be necessary. Noise barriers have not been proposed in this area before.</p> <p>Urbanising effect of the introduction of more structures is more serious in this area as it is within the North Downs AoNB.</p>
22	North side A2 along Park Pale	550m x 2m noise barrier	<p>Comments above apply, and in particular it is even less clear what the receptors being protected are.</p> <p>Urbanising effect of the introduction of more structures</p>
p.30	Thong Lane land bridge	Refinement of shared footpath	Consequential change. Point of detail – how is crossing of Thong Lane arranged for footpath users?
p.23	Jeskyns, Ashenbank Wood and Claylane Wood	Reduction in land take for utilities	To be welcomed but does not materially change the overall negative impact of the whole scheme.
p.25	Henhurst Road (x1), Cobham South services (x2), Gravelhill Wood Thong Lane (x2)	5 small permanent electricity sub stations 3x3m in 5x4m plots	Adds to the urban clutter when taken with new access tracks and the electricity sub stations. Cumulative impact on the setting of the AoNB and Green Belt.
p.32 – p.33	Figures 3-1 to 3-4 showing existing view along A2 from Three Crutches to towards Cobham junction as now, 2018 Statutory Consultation, 2020	Note in all cases the planting is shown 15 years after completion	<p>Key changes are the loss of any central reservation, introduction of retaining wall alongside HS1, and the loss of landscaping on the north side to the gas pipeline, plus instruction of tree planting on current agricultural land.</p> <p>Illustrates the massive impact on the</p>

#	Where	Change as defined by Highways England (HE)	Gravesham Borough Council (GBC) Comment
	Supplementary Consultation and current proposals.		<p>Kent Downs AoNB of many urbanising features. Does not appear to show a noise barrier along Park Pale.</p> <p>Also shows how much more of carrier to wildlife the new road will be than the current position. It is not clear that the 'green' elements on Thong Lane and Brewers Road bridge can address that connectivity issue.</p> <p>Is the linear wall shown between the A2 and HS1 that referred to at point 7 and shown elsewhere? If not why has this feature not been specifically referenced?</p>
p.34 – p.35	Figures 3-5 to 3-8 showing view from Jeskyns looking north to Thong – time periods as above Jeskyns north towards Thong		<p>Shown the various different approaches to the junction design and planting east and west of the LTC. Note the feature along the LTC southbound to M2 eastbound is a false cutting. Illustrates how the landscape character of Thong is being changed. Planting along urban edge has screening function but also looks straggly from a landscape and ecological point of view. The previous request for cross sections through the junction (and elsewhere) to understand its physical configuration has never been supplied.</p>
p.35 – p.36	Figures 3-9 to 3-11 view from above Ashenbank Wood north along Thong Lane (no 2018 view)		<p>Obvious question over how the open areas currently in agricultural use (given the severance involved) will be managed in the future. Rather than being abandoned remnants might need to have more proactive proposals which do provide local benefits.</p> <p>Assume substation design not shown as opposed to whitish patch where it is proposed.</p>
p.38 - 39	Figure 3-13 to 3-15 north from above Thong towards the tunnel portal		<p>Emphasises the alien nature of the series of drainage ponds. Does show the noise barriers. Increased width of Thong Lane Green bridge well illustrated.</p>

Overall comments

- Starting point is that although, this consultation has addressed some concerns, there remain a considerable number of points which the Council has raised in response to earlier consultations to which have not been addressed
- In particular points the Council would highlight are:
 - Need for discounted charge on both river crossings for Gravesham residents

- Replacement of displaced leisure provision at Cascades (consultation document advises that HE propose to permanently acquire part of the Gravesend Golf Centre i.e. the pitch and putt, for the landscaped parkland area around the southern tunnel entrance and then provide an alternative site to the south-east of the Cascades Leisure Centre, currently part of the Southern Valley Golf Club site, enabling the Gravesend Golf Centre business to continue. However land use plans shown red i.e. permanent acquisition for SVGC land).
- Need for a wider environmental package of mitigation and compensation. For example, air quality is an area of concern and the real-time provision of information on particulates and gases would provide information on what is happening and whether mitigation was successful (bushes may need to be interspersed between trees as the trees need to be mature to assist with air cleansing). Also can the noise barriers be green walls?
- Training and skills development for Gravesham residents
- The aims of the scheme include “to support sustainable local development” which is not apparent in Gravesham. It would be different if local infrastructure improvements to really harness the “economic benefit” promised to Gravesham, such as the Denton Relief Road and relief road round Chalk were included as part of the mitigation / compensation package
- Robust transport modelling which takes account of levels of development required by the standard methodology (where latest consultation would suggest for Kent as a whole, an additional 2,800 homes per year)
- LTC alignment has risen by 2-3m south of Riverview and it is not clear how this relates to the proposed noise barriers. Given that the route is in cutting (though not at the interchange) it is concerning that such a proposal is necessary. The impact of the additional height of lighting columns and any sign gantries also needs to be taken into account.
- Noise barriers along the A2 in the North Downs AoNB raise a major concern over the noise disturbance caused to the area by the basic design which is already accepted as having a major negative impact.
- Vulnerable nature of the Viewpoint traveller site on Gravesend Road not given due consideration with proposal for a substation next door to it or the other implications arising from construction activities
- The proposed Car Park off Thong Lane gives rise to a whole set of traffic and management issues
- Implications on the setting of Thong from 400kV line diversion being moved closer to it – though better for Riverview residents as it is moving away from them
- Sub stations, access tracks, noise barriers all add to urban clutter along the route which is all located in the Green Belt and where openness, as far as possible, should be maintained.
- Confusion as Design Refinement Guide refers to changes from Supplementary Consultation whereas the Environmental Impact update relates to the, inadequate, PEIR from 2018. What matters is the change compared with what is present now.
- Confusion over whether:
 - The two larger sub stations involve open transformers/switching gear or whether they are buildings?
 - What planting is being proposed to the east of Thong?
 - Where the retaining wall alongside HS1 actually is (west of Halfpence Lane tunnel or alongside the A2 further east?)
- p.11 of the guide makes reference to user charging and it being the same as at Dartford, and therefore a forum is no longer needed. The Borough Council has made it clear that it expects Gravesham residents to be able to use both crossings for the same charge and that there should be a sum of money set aside each area to benefit the local area. The statements in the guide do not respond to these asks.
- Section in consultation document on “Property and landowners” includes:

- A number of properties by Watling Street including Sheldon Heights are shown, on Land Use Sheet 3, as having their access affected but no further information is provided
- A number of buildings requiring demolition including:
 - the London bound service station (still outstanding issue that HE not addressed. The loss of services is particularly concerning given the deletion of the original proposal at the north portal and the lack of London Bound facilities on A2 / M2)
 - properties at Marling Cross Junction
 - Southern Valley Golf Club clubhouse and buildings
 - to the north of Cascades buildings including one of the few remnants of RAF Gravesend
 - Multiple buildings around Hartshill Nursery incl. cottages as part of the 1920s LCC smallholdings scheme (homes for heroes)
- The implications of each of these needs to be explored and understood

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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 Tilbury area. Changes include: a new landform proposal to provide views overlooking the Thames Estuary, and works to install the utilities required to power the tunnel boring machine and provide power supply to the northern tunnel entrance.
- The area around the A13/A1089 junction. Changes include: a new area of land for the relocation of the traveller site, a new permanent gas pipeline compound at Stanford Road and a new noise barrier along the Lower Thames Crossing east of Brentwood Road.
- The area around the Lower Thames Crossing junction with the M25. Changes include: diversions to some utility works, relocating a construction site and refining the woodland planting proposals north of the Thames Chase Forest Centre.
- The area around the M25 junction 29. Changes include: a new footbridge over the A127, a gas pipeline diversion near Folkes Lane and moving overhead electricity cables underground near the B186 Warley Street.

Tilbury area proposals

Q1c. Do you support or oppose the proposed changes in the Tilbury area?
Please refer to the Design refinements chapter of the guide.

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

Q1d. Please let us know the reasons for your response to Q1c and any other comments you have on the proposed changes around the Tilbury area.

Not a matter on which Gravesham Borough Council wishes to express a view

A13/A1089 area proposals

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

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

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.

Not a matter on which Gravesham Borough Council wishes to express a view except to state that the failure to provide an all movements junction significantly undermines any claims to be providing connectivity and economic benefit to Gravesham through links to Thurrock.

Lower Thames Crossing/M25 area proposals

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 the Design refinements chapter of the guide.

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

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

Not a matter on which Gravesham Borough Council wishes to express a view

M25 junction 29 area proposals

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

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

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

Not a matter on which Gravesham Borough Council wishes to express a view

2. Revised development boundary

Some of the refinements that we are now proposing mean that the area of land that may be required to build the Lower Thames Crossing, and to provide mitigation for some of the impacts of building it, has changed since supplementary consultation. This is called the revised development boundary. Some of the land within the revised development boundary would be required permanently, while other areas would only be required on a temporary basis. In addition, in some locations the Lower Thames Crossing would impact existing areas of special category land and sports clubs. Please refer to the Property and landowners chapter of the guide for further details.

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

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 may own or have another legal interest or right in.

Gravesham Borough Council has two separate interests in this matter both as Local Planning Authority and as land owner. The response as land owner will be provided separately.

The new development boundary is an improvement on what was suggested at Supplementary Consultation with the removal of significant areas of land for utilities diversions, for example at Ashenbank Wood. It has however introduced (with the earlier changes) considerable uncertainty and confusion for local residents and businesses. This has reduced the potential ecological and landscape impacts, but not removed them. There is still a lack of a clear strategy of what land is required and why for a scheme that has fundamental and far reaching impacts on people and the environment in Gravesham. Given the scale of the impacts of the proposed scheme an integrated approach is needed with as much concensus from stakeholders as possible.

It is clear that the Supplementary Consultation should never have taken place when it did as the utility proposals had been insufficiently developed. A serious question has to be asked on why for such a basic matter was not gone into much earlier in the scheme development and the limits refined before going out to consultation. It was a matter that should have formed part of the route choice decision.

There is no chain of logic as to how the current position has been arrived at in either the consultation documentation or the Local Authority workshops held, which have simply presented the proposals without any meaningful discussion (in part due to the format necessary due to the inability to hold face to face meetings).

Q2c. Do you support or oppose the proposals put forward regarding special category land and sports clubs?

<input type="checkbox"/> Strongly support	<input type="checkbox"/> Support	<input type="checkbox"/> Neutral	<input type="checkbox"/> Oppose	Strongly oppose	<input type="checkbox"/> Don't know
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Q2d. Please let us know the reasons for your response to Q2c and any other comments you have on the proposals regarding special category land and sports clubs.

Set out below are the comments on the various land parcels in Gravesham discussed in section 4 of the Consultation guide.

#	Where	Change as defined by Highways England (HE)	Gravesham Borough Council (GBC) Comment
p.88	Shorne Woods Country Park and Ashenbank Wood	Acquisition of land for diverted Thong Lane, the new road north of the A2 and gas main diversions. Replacement land east of Brewers Wood with footpath	The proposal introduces a significant change in landscape in area concerned, with significant ecological impacts. Access to Brewers Wood is currently relatively restricted so any additional public use, implied by the footpath proposals, might impact on the nature conservation value. Clarity is needed on the objectives for this area and how it will be managed long term.
p.88	Jeskyns Community Woodland	Temporary use of land for restringing existing overhead cables	Temporary use of land for the 400kV line changes duly noted. There is still the corridor shown through Jeskyns and Ashenbank Wood (and further east) which is assumed to be for the cycleway (NCR177) diversion. What does this actual consist of on the ground? Is there any intention to use this for utility diversions?
p.88	Cyclopark	Underground power supply cable through site	The running of an electricity cable to Northfleet Sub-station east along the old A2 is noted but assurance is required that this does not impact or the buildings or other operations at Cyclopark.
p.89	Shorne Marshes	Passes beneath so no surface works	Assume this refers to the land on the alignment between Lower Higham Road and the North Kent railway/Thames & Medway Canal. There are of course surface works either side of this for the ground stabilisation tunnel which has the potential to disrupt the water table in this area. In addition there is 'temporary construction drainage' facility on the marsh so the statement lacks clarity in relation to the construction period.

#	Where	Change as defined by Highways England (HE)	Gravesham Borough Council (GBC) Comment
p.89	NE of M2/A2 junction at eastern end of Park Pale	Ancient woodland compensation with future public access	Actually NW of the junction. Major landscape change to what is now a relatively open grassland area which links Brewers and Great Crabbles Woods.
p.89	Michael Gardens Play area	Play space within public park with a footpath running through Propose to upgrade the footpath	GBC land ownership. Unclear what upgrading means in this context and what provision will be made for long term maintenance.
p.91	Southern Valley Golf Course	Says “Southern Valley Golf Club The site consists of a private members golf club. We propose to permanently acquire the site for the Lower Thames Crossing route and for landscaping. We are not proposing to replace the golf club. Instead we propose to create a new parkland area on part of the site, which would be accessible to the public following construction”.	<p>Southern Valley Golf Club does have a modest membership but effectively operates as a pay as you go hybrid private/municipal golf course. It performs a very important function as it serves a market not covered by the other private member golf courses in the wider area, especially since the loss of Deangate in Medway. Whilst it is a business, the Council recognises the social benefits it brings to residents as a leisure facility / meeting place / function venue and the visual amenity it provides to local residents.</p> <p>No justification is provided for not replacing it. Additional parkland as suggested will perform a totally different function. The “pitch and putt” suggested for relocation from Cascades, again, serves a very different market so is no substitute for it.</p> <p>It is noted that figure 3.15 appears to show retention of the club house which was not the position at statutory or supplementary consultation.</p>
p.91	Gravesend Golf Centre	Intend to acquire existing facility for landscaping and proposing to provide an alternative site on land currently occupied by the Southern Valley Golf Course.	GBC land ownership of existing facility. There is a wider issue over land use and landscaping along the eastern edge of Gravesend which needs a detailed discussion to fully understand the proposals and arrive as a way forward that can accommodate number of different objectives.

3. Environmental impacts and how we plan to reduce them

In our Environmental Impacts Update, we have explained how the changes we are proposing affect the preliminary environmental information that was presented at our statutory consultation in 2018 and in the previous Environment Impacts Update, published as part of our supplementary consultation. Please refer to the Environmental impacts chapter of the guide and our Environmental Impacts Update document.

Q3a. Do you support or oppose the changes to the environmental impacts of the Lower Thames Crossing?

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

Q3b. Please let us know the reasons for your response to Q3a and any other comments you have on the environmental impacts of the proposed changes to the Lower Thames Crossing.

It is confusing that the Guide refers to changes over the supplementary consultation whilst the Environmental Impacts Update relates to the PEIR. The Council has already made very clear the inadequacy of the PEIR, which this consultation simply perpetuates. As a specific example noise barriers are proposed south of Thong Lane Green Bridge either side of the LTC, in a location where the route vertical profile has been raised. From documentation for this consultation it is not clear why this has come about except there is an 'effect' otherwise it would not have been proposed. Without the detailed noise modelling it is not possible to determine how beneficial and necessary the proposed barriers will be and whether they would be needed if the LTC had remained at the previous vertical alignment. It is noted that there is no air quality information or lighting impact.

On the same theme the noise barriers are proposed on the north side of the A2 (as it is now) at Shorne Woods Country Park and Park Pale. It is not clear what the function of these are as there are relatively few receptors in this area until Shorne Ridgeway which is a significant distance away. Logically the removal of the central reservation and the widening from 8 lanes to 12 (14 near Thong Lane due to the local link road) implies a significant increase in the noise climate in the North Downs AoNB and the Shorne Wood and Ashenbank SSSI, and wider.

It is not clear in a number of cases that the potential archaeological implications of some of the proposals have been fully taken into account. Until the current investigation work has been completed it is not possible to say whether or not there are implications from moving structures or planting proposals.

The Council has serious concerns about the potential impact of loss or partial loss or problems accessing a range of formal and informal recreational facilities at the same time including Jeskyns, Southern Valley Golf Course (SVGC), Shorne Country Park, Cascades etc. In combination, this will leave very few options for local dog walkers etc. and this will increased the attractiveness of areas such as Thames Marshes which are of international importance for birds. HE are proposing a "new parkland area" (Chalk Park) but this won't be available for many years because of the lengthy of construction period and need to deal with spoil accumulation (NB. The issue of spoil has yet again not been fully addressed).

As highlighted above there needs to be a comprehensive approach to the environmental mitigation and compensation, including outside the development boundary. This needs an overall vision at to what the overall aims are and then a more detailed implementation plan of

how it can be achieved. There will inevitably be trade-offs between various competing interests but by publically engaging stakeholders in a meaningful dialogue a much better end result can be achieved for all parties.

The Climate Emergency is not mentioned in this consultation. This is concerning when on 27 June 2019 the UK Government amended the Climate Act to set legally binding target to achieve net zero greenhouse gas emissions across the UK economy by 2050. Gravesham Borough Council is working towards net zero by 2030.

4. Other comments

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

These are overall comments on the scheme and the consultation as a whole

- Claims of economic benefit for Gravesham have not been supported by any evidence or cognisance of:
 - Benefits of the reduced crossing charge for Gravesham residents
 - Leisure implications on existing facilities
 - Development opportunities on the east side of Gravesend
- Lack of a clear logic to the avoidance -> mitigation -> compensation cascade of dealing with impacts or an overall masterplan
- Page 8 advises “We have tried to be sensitive to the needs of interested parties, especially those living in the vicinity of the project, while being aware we must deliver a viable scheme that satisfies national policy and the scheme objectives agreed by DfT”. However it feels as if this consultation, and the proceeding Supplementary Consultation, are just focussed on utilities rather than local community interests. The Supplementary Consultation should have been delayed until utility diversions were better defined and avoided to confusions caused by enlarging the development boundary and then reducing it
- Given that the LTC infrastructure has massive landscape/ecological/historical impacts the opportunity exists for major change to be considered as part of a comprehensive approach whereas what is presented comes across as a series of disconnected elements
- Need for an overall agreed funded package of mitigation / compensation measures (including community, training etc.) dedicated to the Lower Thames Crossing
- Lack of information on reasons for noise barriers and what they achieve
- Lack of information on air quality (not due until DCO submitted)
- No recent effective engagement on proposals (workshops have presented what LTC has decided but format has not allowed detailed discussion)
- Failure to provide information that has been repeatedly asked for; for example cross sections through the A2/LTC junction
- Lack of a illustrative construction timetable which would allow those impacts to be understood and interrelationships matter
- Page 9 says “When we submit our DCO application to the Planning Inspectorate later this year, we will include a Consultation Report that explains how we considered feedback received from our statutory consultation in 2018, our supplementary consultation earlier this year and this consultation”. Gravesham feels information on the response should have been provided at each consultation stage on the previous one
- Lack of clear feedback from previous consultations in particular on traffic flows, impacts and related issues
- There are a number of elements of confusion in the consultation over exactly what is being proposed

5. The consultation

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

	Very good	Good	Average	Poor	Very poor	Not applicable
Q5a. Was the information presented clearly and was it easy to understand?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q5b. Was the online exhibition easy to navigate?	<input type="checkbox"/>	<input type="checkbox"/>	√	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q5c. Were the online webinars useful for understanding our latest proposals?		<input type="checkbox"/>	Not applicable	<input type="checkbox"/>		<input type="checkbox"/>
Q5d. Did the telephone surgery answer your questions about our latest proposals?	<input type="checkbox"/>	<input type="checkbox"/>	Not applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Q5e. Was the consultation promoted well and to the right people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q5f. Please let us know the reasons for your responses to Q5a – Q5e and any other comments you have on the delivery of this consultation.

The consultation material has been constrained by the need to present a complex topic only on-line. As the Council observed before the consultation started it is much easier to do this in a public exhibition with face to face contact than with a number of documents that are hard to navigate for the technical user let alone a member of the public. The consultation period given the COVID-19 restrictions and holiday period of only 4 weeks is too short. Within the documentation as highlighted above there is some confusion over what is actually being proposed.

Feedback the Council has received has raised concerns over the webinars not offering local residents the opportunity to ask spontaneous questions and debate the answers.

Identification questions

We would be grateful if you could answer the following identification questions, which will help us to categorise responses and organise our Consultation Report. Details and views of individuals will not be made public. You do not have to provide any personal information if you do not want to. However, postcode data can help us to better understand the views of different communities in relation to the proposals. To view our privacy statement, please see page 3 of this response form.

1. **Name:** Tony Chadwick
2. **Address:** Civic Centre, Windmill Street, Gravesend, Kent DA12 1AU
3. **Email address:** tony.chadwick@gravesham.gov.uk

(If you provide an email address, we may use it to let you know about important developments in our proposals.)

4. **If you are responding on behalf of an organisation, business or campaign group, please include the name below.** (This helps us to understand whether respondents can be categorised as 'prescribed consultees', as defined by the Planning Act 2008.)

Name of organisation: **Gravesham Borough Council**

Type of organisation, business or campaign group:

- Academic
- Business
- Campaign group
- Elected representative
- Environment, heritage, amenity or community group
- Local government**
- Statutory agency
- Transport, infrastructure or utility organisation
- Other (please state)

5. Do you own land or hold any interests or rights, such as private rights of way or sporting rights, within or close to the revised development boundary?

Yes No

If you have ticked yes, have you received a letter to notify you of the consultation?

Yes No

6. If you use the transport network in the area that may be affected by the Lower Thames Crossing, please tell us how you travel by ticking one or more of the following boxes:

- As a pedestrian
- Bus
- Car
- Cycle
- Goods vehicle
- Motorcycle
- Train
- Other (please state) **Not applicable**

7. Please let us know how you heard about this consultation by ticking one or more of the following boxes:

- Received a letter from Highways England
- Received a leaflet from Highways England
- Received an email from Highways England**
- Received information from a local authority
- Saw a Public Notice in local or national newspapers
- Saw advertisements in local media
- Saw social media coverage
- Saw coverage in local and national media
- Saw information at a deposit or information point where available due to COVID-19 restrictions
- Word of mouth
- Other (please state)

Equality and diversity

We would be grateful if you could answer the following equality and diversity questions. We will use the information we receive to help understand whether our consultation has been useful to people of different backgrounds and requirements. We may publish a summary of the results, but no information about an individual would be revealed.

The answers you provide to this question are defined as 'special category data'. If you agree to provide this information you can withdraw your permission for us to use it at any time. To do that, please email DataProtectionAdvice@highwaysengland.co.uk

Not applicable

- I consent to Highways England processing my special category data for the purposes of understanding the accessibility of the Lower Thames Crossing consultation. I have read Highways England's privacy notice and understood how it will be processing this data.

1. What is your gender?

- Male Female Transgender Prefer not to say

2. Do you consider yourself as a person with a disability?

- Yes No Prefer not to say

3. Please describe your ethnic background:

- Asian/Asian British Mixed ethnic background
 White Gypsy or Irish Traveller
 Black/black British Other ethnic group
 Chinese Prefer not to say

4. Age:

- Under 16 45-54
 16-24 55-64
 25-34 65+
 35-44