

Appendix 1

Responses Received on Adequacy of Consultation

For Members and Parish Councils a brief questionnaire was used to help structure responses

Members

Cllr Valerie Ashenden (Westcourt Ward)

Q1. Is your ward directly impacted by the Lower Thames Crossing? Yes

Comment: Lower part of Thong Lane

Q2. Do you feel the overall consultation process has been sufficient (events, availability of information, helplines etc.)? Yes No

Comment: Many Events, However fears and comments not addressed

Q3. Do you feel you have had sufficient feedback from the consultations over time?

Yes No

Comment: Questions about traffic management, noise and pollution still remain unanswered

Q4. Do you feel you have had sufficient information at an appropriate technical level to enable you to understand the proposals?

Yes No

Comment:

Q5. In view of the impact of COVID-19 do you feel the additional week added to the Supplementary Consultation and the fact that the Design Refinement Consultation was only on-line was sufficient given the circumstances?

Yes No

Comment:

Q6. Any other comments?

I feel that the decision is being fast-tracked

Cllr Derek Ashenden – Riverview Ward

Q1. Is your ward directly impacted by the Lower Thames Crossing? Yes

Q2. Do you feel the overall consultation process has been sufficient (events, availability of information, helplines etc.)? No

Comment: No information released regarding pollution, local traffic modelling or the feedback from two years ago

Q3. Do you feel you have had sufficient feedback from the consultations over time?

No

Comment: As above

Q4. Do you feel you have had sufficient information at an appropriate technical level to enable you to understand the proposals?

Yes

Comment: Yes but a lot of information that has been constantly been changing. A simplified version should have been offered

Q5. In view of the impact of COVID-19 do you feel the additional week added to the Supplementary Consultation and the fact that the Design Refinement Consultation was only on-line was sufficient given the circumstances?

Yes

Comment:

Q6. Any other comments?

This project has never fitted since option C was chosen. Hence many changes trying to make it work. Example still money one lane for the entrance to the LTC from the A2. The A2 at present is already gridlocked in the mornings and evenings. his will impact on local pollution and the locals mental health.

Parish Councils

Name of Parish: Cobham Parish Council (CPC)

Q1. Is your organisation directly impacted by the Lower Thames Crossing?

Yes No

Comment...Yes. CPC is concerned on the increased traffic impact on the parish

Q2. Do you feel the overall consultation process has been sufficient (events, availability of information, helplines etc.)?

Yes No

Comment...Yes, Eva and team been very helpful in providing information to the parish council

Q3. Do you feel you have had sufficient feedback from the consultations over time?

Yes No

Comment...Yes

Q4. Do you feel you have had sufficient information at an appropriate technical level to enable you to understand the proposals?

Yes No

Comment...Yes

Q5. In view of the impact of COVID-19 do you feel the additional week added to the Supplementary Consultation and the fact that the Design Refinement Consultation was only on-line was sufficient given the circumstances?

Yes No

Comment...Yes, virtual teams meetings worked well to keep us informed. However some of our councillors have only used zoom so they did not join as unfamiliar with Teams

Q6. Any other comments?

The additional larger forum meetings arranged felt like a bit of a box ticking exercise, and we would be interested to know what useful outputs came from these sessions

Higham Parish Council

Q1 YES - Comment - The Parish will be affected during the build and once the route/tunnel is open - increased traffic, pollution, increased noise, damage to the environment

Q2 NO - Comment - Consultation materials not always easy to follow - not presented in a logical/ordered way - especially the most recent Design Refinement Consultation - some images too small and not always easy to navigate the online versions. Lack of information - e.g. Traffic Modelling and data not provided in spite of requests for more details. Residents not on-line or with limited IT skills were seriously disadvantaged - especially in the last consultation which was only on-line due to Co Vid.

Q3 No - Only a limited summary published from the 2018 consultation. No feedback from the Supplementary Consultation has been seen. There is very little evidence that what people said has been used to inform the next round of Consultation

Q4 No - as above re: Traffic Data and Traffic Modelling.

Q5 - No - as above re: those not online were seriously disadvantaged and more time should have been allowed

Q6 no other comments to add.

Luddesdown Parish Council

- Absence of any published business case to support the original benefits statement.
- Absence of traffic modelling data in a form we could access
- Absence of any detailed reports with regard to the actions required by the PEIR
- In each of our discussions with the technical experts from HE we were given to understand that the design was a work in process and that the consultation documents were out of date.
- The 2020 Supplementary Design consultation was carried out during lock down, which meant many could not participate.
- HE made no effort to explain or highlight major design changes that dramatically affect local users in the guide to consultation (such as the restriction of the A2 from 4 lanes to 2).
- Complete absence of budget information. We found this shocking because RIS2 lists the project as £8bn, which is above the expected 60 year benefits originally claimed for this project, at the same time as the scope of the project being dramatically reduced.

Shorne Parish Council

Q1. Is your organisation directly impacted by the Lower Thames Crossing?

Yes

No

Comment.....Losing a large amount of land and being subjected to increased construction and operational traffic, noise and air pollution. Also having to spend large amounts of time and effort on reading and responding to all the documents – will be three consultations within 2020. Like GBC, that is on top of all our other work however we are unpaid volunteers.

Q2. Do you feel the overall consultation process has been sufficient (events, availability of information, helplines etc.)?

Yes

No

Comment.....Availability of information was inadequate, especially traffic volumes, consequences and mitigation thereof and some construction aspects e.g. the preparatory tunnel and the tunnel drainage. When documents were updated there were not change lists highlighting what had and hadn't changed.

Q3. Do you feel you have had sufficient feedback from the consultations over time?

Yes

No

Comment.....Information requested has not been provided such as traffic volumes on local roads, noise and air pollution contours, and questions asked have often not been answered instead getting given the “party line” even when content was obviously untrue or they had information that they refused to share. Concerns raised e.g. about the water supply to the North Kent marshes have not been addressed. In many cases we were just told that all questions would eventually be answered in the DCO application rather than us receiving assurance (or not) in a more timely fashion.

Q4. Do you feel you have had sufficient information at an appropriate technical level to enable you to understand the proposals?

Yes No

Comment.....Air pollution calculations were way too complicated and read like somebody's PhD thesis while the public information generally had summaries that were too simple, there needed to be a middle ground that provided more detailed information in a way that intelligent non-experts could understand. Engineering drawings were inadequately detailed to allow full understanding of the plans, particularly levels and visual impact.

Q5. In view of the impact of COVID-19 do you feel the additional week added to the Supplementary Consultation and the fact that the Design Refinement Consultation was only on-line was sufficient given the circumstances?

Yes No

Comment.....Have deliberately said both "Yes" and "No" as it was both inadequate and at the same time probably the best that could be achieved in the circumstances. However many people and population groups would not have been alerted or enabled to contribute.

The response numbers to the Design Refinement consultation were very low, only just over 1,100. We are unsure whether the publicity that we and others added (Facebook, websites etc) reached enough people. The physical copies were (we understood) only made available for inspection in Rochester which is inappropriately distant.

Arguably, HE should have delayed the design refinement consultation (but when to?) however (flattering ourselves) probably the most important and knowledgeable people and organisations have still been able to make input on behalf of residents.

Q6. Any other comments?

Aspects changing without explanation, e.g. the landscaping in the Riverview/Shorne West/Thong area changed from wooded to open then mostly back again. Features that should have been predictable, largely around utilities (e.g. gas pipeline, electricity substations), only appeared at a late stage. Leaving these out of the landscaping previously, and then requiring more property demolition, was misleading. The original plans were obviously deficient but fooled many people into "voting" for the proposals. Once proper plans were provided there was much greater land take and visual impact. Greatly increasing the redline boundary and then pulling it back in again seemed like a subterfuge to be able to say improvement had been made when it was still much larger than in 2018. Some of the graph and chart presentations seemed devised, by varying the presentation between tables and figures, to make data seem better than it really is, and to disguise the minimal nature of any improvement to be gained at Dartford.

Meopham Parish Council

Q1. Is your organisation directly impacted by the Lower Thames Crossing?

Yes No

Q2. Do you feel the overall consultation process has been sufficient (events, availability of information, helplines etc.)?

Yes No

Q3. Do you feel you have had sufficient feedback from the consultations over time?

Yes No

Q4. Do you feel you have had sufficient information at an appropriate technical level to enable you to understand the proposals?

Yes No

Q5. In view of the impact of COVID-19 do you feel the additional week added to the Supplementary Consultation and the fact that the Design Refinement Consultation was only on-line was sufficient given the circumstances?

Yes No

Q6. Any other comments?

Reference the last consultation we did not have the opportunity in Meopham to meet with representatives of Highways England in a mobile venue as we previously had done because of Covid-19. For future consultations we hope there will be an opportunity to meet with staff face to face

Other Organisations

CPRE (Gravesham)

Failure to provide comprehensive traffic modelling data in an accessible form. Some might argue complete absence of traffic modelling on its own made the whole consultation process invalid.

- Failure to make it clear how big an impact the crossing will have on the wider road network.
- Failure to make it clear the impact on the Gravesham local road network.
- Failure to provide environmental data.
- Failure to provide information on air pollution and the cost of it in money and health terms.
- Failure to provide details on changes to NMU routes.
- Failure to make it clear in documents or maps that there would be a loss of two lanes in each direction on the A2. We challenged this in the March consultation, and it was not corrected in the July Design Refinement Consultation.

- Failure to publish details of the research and studies carried out in support of the PEIR.
- Failure to make it clear that the stated cost of the project did not include the mitigation measures that will be required
- The priority of objectives of the project were altered during the consultation with no explanation of why this was done.
- Difficulty in finding aspects of design which had changed and affected the area. Things that negatively affected Gravesham were constantly hidden deep in documents while positive changes were highlighted.
- Staff undermined the consultation documentation continually by claiming it was out of date. How can people and organisations effectively respond to a consultation when key documents are out of date?
- Lack of business case to support the claimed benefits, and lack of revised budget following the dramatic de-scoping of the design. I felt this was particularly important since RIS2 now holds the project budget as £8bn – which is above the originally claimed 60-year lifetime benefits for the project (i.e. undermines the original case for choosing this route).
- construction of the consultation booklets which only promoted the positive aspects while failing to alert readers of the serious design changes which affected them within the consultation.
- The recent Design Update consultation run during lockdown was done in a totally unsatisfactory way. The online files were so large that it caused many peoples computers to freeze so they did not respond. The maps were very complex and on such a small scale they were impossible to understand properly. There were no paper documents to view in Gravesham. We ran a drop in event at short notice (that was fully Covid compliant), this attracted many people, so why could Highways England not do this? No extra time was given to people responding by post even though people had to wait for the documents to be posted to them. Limited additional information on NMU routes was not provided until a week before the consultation closed. The consultation was so bad we do not think it was valid.

Thames Crossing Action Group

Their summary conclusion – full response attached as a separate document as Appendix 1a

Conclusion

We definitely consider the consultation process to have been completely inadequate as a whole. The completely inadequate and not fit for purpose consultation in 2016 led us to a decision of a poor and unacceptable preferred route being announced and ‘developed’. Our understanding is that there are certain policies that HE need to follow and fulfil, and that the bar is low in their favour. However we would sincerely appreciate genuine consideration being given to the sheer volume of issues and inadequacies that have surrounded this consultation throughout, and how so many things that some may consider to be small, can amount to one very large inadequate and highly flawed consultation process. This is not just a case of sour grapes, we the people have very serious concerns that the whole LTC consultation process from start to finish has most definitely been inadequate, and that the resulting DCO application should not be accepted due to lack of adequate consultation with clear and informative materials, giving adequate opportunity for we the people to respond in a fair and adequate manner.

Consultants to Gravesham

Kent Downs AoNB Unit

From our perspective, we would not wish to raise any concerns about the amount of engagement between the LTC Team and the AONB Unit. We would however raise concerns regarding the effectiveness of the engagement. Unlike some of the other affected organisations, the AONB Unit did not have regular scheduled one to one sessions with the LTC Team. Instead, the vast majority of our engagement was through the Technical Development Workshops which covered very broad ranging topics at each session. It felt that these were more information briefing sessions that genuine opportunities for engagement and discussion. For example, there was no consultation or discussion at these sessions (or elsewhere) as to the most appropriate place for AONB mitigation, or what this might comprise, or compensatory Ancient Woodland planting etc., rather it seemed that such proposals were presented to us by the LTC Team as a 'fait accompli'.

The proposed 'legacy and compensation' engagement was felt to be entirely inadequate and poorly managed, with it seemingly being a complete free for all rather than a considered approach with potential schemes being assessed against any specified objectives.

A major issue for us, in common with the other SEBs and as previously discussed, has been concerns over the adequacy of the information available on environmental matters to make informed responses to the formal consultations. Generally there has been very limited information available which has made it difficult to comment in detail. For example, there was no draft LVIA to comment on during formal consultations, with the AONB Unit having to rely on limited information with regards potential environmental impacts, as presented in the PEIR. We have also yet to see any sectional drawings of the highly complicated, multi-level LTC A2/M2 junction. Without this level of detail, we felt it was not possible to advise whether we agreed with predicted impacts in the PEIR and Environmental Update.

Finally, in terms of some of the more informal consultations between the AONB Unit and the LTC Team, such as reviewing the draft Design Principles Document, we consider we were given very short and unrealistic timescales to comment on these important documents.

I hope this is of some assistance – happy to discuss further if this would be helpful.

KCC Archaeology (as consultants advising Gravesham Borough Council)

In response to your request below and with respect to LTC consultation we have been involved in three formal stages:

- **the Statutory Consultation between 10 October 2018 and 20 December 2018 (including the PEIR)** – the consultation process was considered to be good. With regards heritage, historic environment and archaeology we had a range of concerns about the lack of detailed assessment, evaluation and impact assessment of certain classes of heritage assets, including the area of

Cobham Hall and Park, the setting of non-designated heritage assets, the historic landscape and the potential for buried and presently unknown significant archaeological remains.

- **the non-statutory Supplementary Consultation between 29 January 2020 and 25 March 2020 (extended to 2 April 2020)** – the consultation process was considered to be good. Informal communication between LTC and the KCC Heritage Team was much improved during 2020. However, our concerns about the lack of detail as articulated in 2018 remained similar. Many of our 2018 concerns were being addressed but all the results of the required studies were not available for a full consideration of the issues.
- **the non-statutory Design Refinement Consultation between 14 July 2020 and 12 August 2020** – the consultation process was considered to be good despite Covid-19 limitations. Informal communication between LTC and the KCC heritage team continued to be good, however it should be noted that whilst draft documents were shared between LTC and the KCC Heritage Team, this information was not available to the wider public. Our concerns about the lack of detail, as first articulated in 2018 and in early 2020, remained similar despite ongoing desk-based assessment and field studies. The lack of finalised documents meant that our ability to respond was limited. It was not possible to comment on the full environmental impact of the scheme, the appropriate scope for mitigation by preservation *in situ* or by recording in advance of destruction and/or forms of compensation.

The concluding paragraph in our consultation response to the DRC in July 2020 stated *“It should be recognised from the comments above that if this design refinement consultation is the final opportunity to make changes to the scheme before a DCO submission, then in many areas the only course of action possible will be the excavation and recording of archaeological remains that will be destroyed by the works or the recording before demolition of buildings and structures that would be destroyed. There is therefore a risk that nationally important (or equivalent to nationally important) heritage assets and archaeological remains could be destroyed when they should be preserved in situ. This would be contrary to planning policy and the DMRB and the financial costs for appropriate mitigation could be very considerable. This situation would be a result of the scheme timetable and process not allowing sufficient time for the appropriate evidence collection and assessment of significance of assets nor magnitude of effects to inform mitigation options, including design refinements to preserve heritage assets in situ where possible. Mitigation through detailed recording in advance of the destruction or loss of heritage assets will be necessary across the scheme but the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.”*

Private Individual

Mr S Brace

By email

Sent: 04 January 2019 19:44

Subject: Lower Thames crossing

I would like to say that the lower Thames crossing consultations was not fit for purpose and I was left feeling that what I had to say did not matter at all.

Yours sincerely

Mr S. Brace.