

Final Consultation response from Luddesdown Parish Council to the Community Impacts Consultation on the Lower Thames Crossing July 2021.

The questions from the standard Response form (Form 5) have been copied here, with our comments added below.

form 5

1. The project's impacts and mitigation

In our consultation materials, we explain the impacts of the project during operation and construction, as well as our proposed mitigation measures to reduce those impacts. To respond to the following questions, please refer to the Construction update, Operations update, Ward impact summaries and our draft Development Consent Order application documents, as well as chapters 'Construction update', 'Operations update' and 'Ward impact summaries' in the Guide to consultation for further details.

Q1a. Do you support or oppose how we plan to build the Lower Thames Crossing?

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 how we plan to build the Lower Thames Crossing, including the impacts of building the project. If your comment relates to a particular document, specific ward or location, please refer to it in your response.

Our strong opposition is driven by the imposition of the project on our community which is within 1.5 miles of the development boundary. As a small rural community within the AONB serviced by single track roads; we are very sensitive to damage to the quiet environment and the increases in through traffic, which any disruption to the A2 incur. We are particularly concerned at the restriction of the A2 to 2 lanes at the junction with the LTC; having spent years getting the A2 to 4 lanes, this restriction to the regular tidal flow of traffic on the A2 will in our view force traffic off the main road, increasing through traffic on minor roads.

With this consultation the move to 24/7 working causes concern, and the lack of restrictions that are placed on that (the fine print suggests that 24/7 working may be used for utilities and 'where necessary'). We note that the standard operating hours have been increased to 7 to 7, but there are too many exceptions where extended hours (to 10pm) and 24 hour working may be invoked. While HE may regard these as localised exceptions, we feel that residents outside the development area will be affected by service vehicles attending these sites (concrete and building material deliveries, slurry transportation food deliveries and shift changes etc).

We note in the Ward impact summaries that the level of noise and vibration pollution has been projected (calculated?) However there is no intention on the behalf of HE to monitor performance to these levels, while welcoming limits on noise and air pollution arising from construction, we question what (if any) confidence these figures should give residents?

We commend the publication of the Code of Construction Practice (CoCP), as it gives some clarity to the process although at consultation this was only in draft. However we observe that on noise and vibration monitoring the contractors are left to their own devices provided that they undertake to monitor. Monitoring and reporting breaches appears to be the responsibility of the Local Authority, are the limits that will be monitored the same as those published in the Ward summaries? Will Gravesham Borough Council receive funding from the project to ensure that they have the resources to monitor the large number of locations you have identified?

Q1c. Do you support or oppose how we propose to mitigate the impacts of building the Lower Thames Crossing?

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 how we propose to mitigate the impacts of building the Lower Thames Crossing. If your comment relates to a particular document, specific ward or location, please refer to it in your response.

Our opposition is based upon the lack of clarity for the proposed building mitigation measures at consultation.

The closure of Brewers Road bridge for 19 months and the restrictions and closures on the A2 for 22 months will force traffic onto the minor roads. There has been no discussion of the likely diversion routes from the A2 (we note the diversion for Brewers Road bridge has been described) or traffic impacts from the closures of the A2. At the present time, accidents and queues on the A2 lead to 'cut through' traffic taking the A228 onto Bush Road at Cuxton and attempting to pass through the village on route to the A227. We can foresee a situation for the better part of two years where local minor roads will be grid locked for large parts of each day. Our roads are primarily single track; it is essential that they remain accessible and not jammed with lost and rat running traffic trying to get along the A2 or pass from the M20 to the A2. This level of traffic will cause emergency vehicles to be unable to service the area, which will lead to loss of life.

The Ward summaries indicate large operating increases in traffic along Bush Road into Cobham and out through Sole Street, but gives no indication of the traffic through Luddesdown. This is due to the failure of the project to model the traffic flows in minor roads, and consequently lacks mitigation for their effects.

Your 'noise impacts during operation' diagram indicates a major increase in noise along Bush Road up to Cobhambury Road, and a moderate increase in the surrounding area as well as a moderate increase around Henhurst Road and Gold Street, but again no change in Luddesdown – we have no confidence in this presentation as we believe you simply have not modelled the traffic and therefore intend to ignore its effects.

Residents are very concerned over the amount of damage and disruption to the SSSI areas of Ashenbank, Shorne and Brewers Wood. While this consultation details a lower land take within the development area, there is no environmental plan and we are forced to wait until the Environmental Statement is released at DCO before we are given any detail on the mitigation you will make. As this is an area of strong concern for local residents; we feel HE have effectively excluded them from consultation on your environmental mitigation.

Q1e. Do you support or oppose how we plan to operate the Lower Thames Crossing?

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 how we plan to operate the Lower Thames Crossing, including the impacts of operating the project. If your comment relates to a particular document, specific ward or location, please refer to it in your response..

Our strong opposition to the operation of this project is due to the impact of increased traffic to our area (which cannot withstand the effects of such increases) and due to the fact that these effects have not been considered by HE in their design and consequently not consulted upon.

The lack of traffic modelling of the minor and single track lanes which serve Luddesdown, together with an assessment of how the existing users (a large proportion of which are NMUs) has failed to highlight the fact that the project will place lives at risk in our community. We have 40 footpaths and two national trails in the parish, which cross lanes and pass along them in places. We have a high proportion of equestrian users as well as runners, walkers and cyclists using our narrow lanes. City and motorway drivers forced off the surrounding network use these lanes by default as soon as there are constrictions on the motorways because their SatNavs tell them they are 60mph roads! For most of our lanes any more than 3 cars or 1 lorry in each direction attempting to use the same stretch of road leads to gridlock – motorway drivers are unused to having to stop and pull in to allow other drivers to pass, and have no experience of horses or walkers emerging from stiles on the road side.

At the present, we get large amounts of 'rat run' traffic at peak times passing from the A228 at Cuxton to the A227 at Meopham. This can cause dangerous situations and long queues along the lanes, denying access to emergency vehicles. When the Dartford Crossing is closed, the situation is worse. We expect the imposition of this project to make matters disastrous.

The successive failures to model the effects on our community together with the failure of the models to consider either the effect of closures at Dartford or the operation of the London Theme Park (which will place huge amounts of traffic on the SRN) make us feel the project is a threat to our way of life. In this regard we note that HE have failed to model the effects of PM2.5 at any point, and that none of the pollution points shown in the consultation is on an NMU route. Of particular concern is the newly proposed NG8 which goes around the tunnel portal.

Q1g. Do you support or oppose our proposed mitigation for the operational impacts of the Lower Thames Crossing?

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 you have on our proposed mitigation for the operational impacts of the Lower Thames Crossing. If your comment relates to a particular document, specific ward or location, please refer to it in your response.

Our opposition is based upon the lack of clarity for the proposed mitigation measures at consultation.

The Ward Summary indicates that pollution levels will exceed legal limits during operation, however you propose no mitigation, preferring instead to state that vehicles will be decreasing the amount of pollution they produce by then. We find this unacceptable and an unsupported statement, we also suspect this is in breach of your legal obligations.

We are concerned that no PM2.5 emissions have been allowed for in your pollution modelling and monitoring which is required by the Air Quality Standards Regulations of 2010.

We obviously welcome the mitigation measures taken and would seek to encourage HE to mitigate all effects of this project when they are made, but from our perspective in Luddesdown suffering from the effects of traffic that the project has simply failed to take into account; there will be no local mitigation measures worth commenting on.

On the wider area mitigation measures; we note that biodiversity mitigation measures lack any detail in your proposals other than to list species that will be relocated. As I am sure you are aware; many relocations of sensitive species such as dormouse, bats and great crested newts due to development has in the past lead to their demise, the personnel and methods involved in relocation are key to saving any of these species. And the 'suggested' compensation for lost ancient woodland lacks both detail on the compensation measures planned (which presumably include planting of woodland) and any statement on the impact on the compensation land that has been taken for mitigation. In this regard we consider the lack of availability of survey findings and any proper Environmental Impact Statement at consultation to be **an effective exclusion to our consultation on these matters.**

On the green bridges; we commend the attempts at mitigation, but tend to regard these as necessary measures rather than mitigation; although we recognise the increased effort required to achieve them. Given their limited scale, we have to question whether they are capable of providing for all of the users as well as providing wildlife corridors, since in most cases the classes of use tend to be exclusive.

With regards to the footpath, bridleway and cycle path network; we are unsure whether mitigation is intended, or if the proposal simply reflects the minimum effort necessary to ensure continued access. This is because there is almost no detail on the size of the footpaths and suggested multi-user type paths that are proposed. We reject the suggestion in your consultation that the footpath network is being enhanced, and unless you can detail the width, separation measures for different classes of user and surfaces intended to be used and the proposals for safe crossings where these meet carriageways (all of which are missing from your consultation material) we could not pass comment their acceptability. We note that the Department for Transport Design Guidelines on the construction of cycle routes and shared routes has now become policy (as of July 2020) , however your staff do not seem to be able to confirm that the cycle routes will comply with your own guidelines, and are seemingly ignorant of its requirements with regards to signalling and crossing design where cycle ways cross carriageways. Similarly we note that the current changes in the Highway Code will require NMU priority at crossings and carriageways, but again your staff have

been unable to confirm whether this change in the law (which will be in effect before the LTC is open) is reflected in your design.

South of the river in Kent

This refers to the section of the proposed route south of the river, including the following sub sections: the A2/M2 corridor, south of Gravesend (A2/Cyclopark), and south of the River Thames/tunnel entrance.

Please refer to the 'Project updates' chapter in the Guide to consultation and Chapter 3 of the Operations update for more details.

Q2a. Do you support or oppose the proposed changes south of the river?

Strongly support

Support

Neutral

Oppose

Strongly 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 south of the river.

Our position is based upon the lack of information at consultation.

We note the improved routing of the gas pipeline (which we welcome) but can find no other description relating to the work to install the temporary drainage pipeline from the southern portal to the river. Having read through the Guide to Consultation and the Operations Update, we have been unable to identify any other specific changes that have been made to the design at this consultation. We welcome the marginally reduced land take (which is a change of less than one square kilometre).

We welcome the better contained utilities work (but thought they had been agreed at the last consultation).

Order Limits

Some of the changes that we are now proposing mean that the area of land that would be needed to build and operate the Lower Thames Crossing, and to provide mitigation for some of the impacts of building it, has changed since the design refinement consultation. This is called the Order Limits, referred to in previous consultations as the development boundary. Some of the land, or rights over the land, would be needed permanently, while other areas would only be required temporarily. Since our last consultation, we have reduced the area within the Order Limits from 22.9km² to 22.2km².

We have also updated our proposals in some locations where the Lower Thames Crossing impacts existing areas of special category land and private recreational facilities, including replacement land for these facilities where appropriate. In addition, we are proposing to build two new open space sites that would provide a wider benefit to the community – Tilbury Fields and Chalk Park.

Please refer to the 'Project updates' chapter of the Guide, Chapter 3 of the Operations update and Map Book 1: General Arrangements for more details.

Q2e. Do you support or oppose the changes to the proposed area of land that would be needed to build the Lower Thames Crossing?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q2f. Please let us know the reasons for your response to Q2e and any other comments you have on the proposed changes to land that would be needed to build the Lower Thames Crossing. This includes feedback on the impact the project would have on any land that you may own or have a legal interest in or right to use.

Our neutral position is due to being underwhelmed by the scale of the reduction in land take, but we welcome the 3% reduction in the Order Limits.

Q2g. Do you support or oppose the changes proposed regarding special category land and private recreational facilities?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q2h. Please let us know the reasons for your response to Q2g and any other comments you have on the changes proposed regarding special category land and private recreational facilities.

Our neutral position is due to having no particular interest in the leisure facilities concerned, but we welcome your engagement with GBC and the companies concerned to produce the most amicable solution.

Q2k. Of the two options presented for the height of the landform at Tilbury Fields, do you prefer the lower landform option or higher landform option?

Lower landform

option

(up to 16.5 metres)

Higher landform

option

(up to 22.5 metres)

Neither

No preference

Don't know

Q2l. Please let us know the reasons for your response to Q2k and any other comments you have on the options for the height of the landform at Tilbury Fields.

Our opposition is due to the project effectively dumping waste in plain sight and attempting to brand it a 'landform'. It is no such thing, they are spoil heaps.

But, given the northern portal appears to be less than 5m above Ordnance Datum (less than 400mm above the Sea Level observed at Sheerness), and given the concern we all share over changing climate and increased storm risk, we are surprised this opportunity to provide greater protection from inundation using this landform has not been taken.

In this regard the failure to present a Flood Risk Assessment at consultation is another indication of the manner in which Highways England has operated (as if it is not accountable).

Q2m. Do you support or oppose our proposals for the inclusion of a new open space site, Chalk Park?

Strongly support

Support

Neutral

Oppose

Strongly oppose

Don't know

Q2n. Please let us know the reasons for your response to Q2m and any other comments you have on our proposals for the inclusion of a new open space site, Chalk Park.

Our strongly supportive position is due to the need for open space.

3. You said, we did

In our You said, we did document, we provide a summary of the feedback received from statutory consultation in 2018, and the non-statutory supplementary and design refinement consultations in 2020, and detail some of the activities we have carried out in response to your comments. Please also refer to the 'You said, we did' chapter of the Guide to consultation for more details.

Q3a. Do you support or oppose how issues and suggestions about the Lower Thames Crossing have been addressed following earlier rounds of public consultation?

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 how issues and suggestions about the Lower Thames Crossing have been addressed, following earlier rounds of public consultation. If your comment relates to a particular consultation, please refer to it in your response.

Our strongly opposed position is due to the document not giving sufficient profile to the issues we felt strongly about. For instance; the almost complete absence of traffic modelling information in earlier consultations and the omission of minor roads from the later consultation models and the failure of your models to account for fault conditions (when Dartford is closed) and the design restricting the A2 down to 2 lanes at the junction with the LTC. The complete failure to revisit or revise the project justification for this project at consultation despite the massive increase in it's budget is for us a failure in accountability.

This document provides the essential link between consultation and the unanswered question 'what you did with our comments'. So we commend the production of it. However reading the 'Our response' comments, it seems to us that the job of responding to the points raised has been passed to the marketing intern to draft rather than being fed into the design criteria for the project.

We take particular exception to the repeated statement in each summary "*Overall, a substantial number of people who responded to our statutory consultation supported the need for the project and the proposals.*" or "*Overall a substantial number of people who responded to our supplementary consultation supported the proposals.*" This is an annoyingly subjective and non-scientific observation of the data with which you were presented, which leads us to feel that the object of consultation as far as you were concerned was to milk it for any possible support, while ignoring the large amount of opposition to your proposals. This document does not tell us how many people supported verses how many objected to your proposals, it has therefore failed in it's primary objective (which curiously is the same observation we would make on the overall project).