

# Consultation Response from Luddesdown Parish Council to the Local Refinement Consultation 2022.

## 1. Changes south of the river in Kent

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

***Strongly oppose***

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

***Strongly oppose***

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

***Strongly oppose***

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

*One of our overriding concerns is the lack of certainty from the data provided. As with all the prior consultations we find that important information (such as the results of habitat surveys and detailed engineering designs) appear to be absent. A point highlighted by the Thurrock Council's recent traffic modelling exercise which concluded that under more recent traffic data projections your project will only relieve 4% of the traffic at Dartford (far from the levels claimed in your previous consultations). We have repeatedly pointed out that the lack of current traffic modelling data undermines our confidence in the primary aim of this project; now that independent data is available we have reason to question your competence as a project designer. Under these circumstances we can only regard absences of data on your part as a failure to consult and an obfuscation, which is why we are opposed to the propositions in this consultation.*

*We oppose the increased land that this latest consultation suggests will be required. Again we are frustrated at the lack of detail provided in the documentation issued (which does not seem to cover the salient points): Exactly how much ancient woodland is to be lost? Where are the environmental surveys? What feedback received in the last consultation caused these changes? The answer to all our questions appears to be that "detail will be provided in the DCO" – which underlines our basic objection; you have failed to effectively consult prior to the DCO.*

*We are opposed to the loss of ancient woodland, it is not simply a resource that you can use and replace with mitigation land – it is irreplaceable, and question therefore whether the benefits you espouse compensate for its loss. Furthermore the use of good quality agricultural land in mitigation is not in our view warranted, and your consultation does not make a strong enough case for its sacrifice.*

*We have been told (we have seen copy of correspondence from Bianca Mesuria on the subject of Chalk Park spoil volumes) that your plans include the dumping of 2million cubic metres of spoil on Chalk Park. The consultation guide states only that the area of the park has been increased and that “the existing ground level will be maintained” and says nothing about the spoil being dumped there. There are no engineering drawings for this area in this consultation, the engineering layout in this consultation only includes sheets 12 and up (i.e. nothing south of the A13). We are shocked at this omission and again would point out that this constitutes a failure to consult on important changes that impact the users of this facility. If (as appears to be the case) you are dumping chalk spoil, this raises serious questions regarding your environmental credentials, since chalk is (of course) one of the critical non-renewable mineral resources your project will be consuming. For you to be dumping chalk as a waste product (with serious environmental implications) on the one hand while consuming and causing large volumes to be quarried and consumed by your use of cement on the other doubles your environmental impact.*

*At the various consultation events we have attended on this project, we have always been assured that ‘there will be no spoil from tunnel excavation disposed of south of the river’. Calculating the volumes of the tunnels we now realise this was simply a ruse on the part of Highways England, and that the intention all along was to dump equal amounts of spoil from the project on both sides of the river, the tunnel slurry north, and cutting spoil south. I assume you used a similar line to residents north of the river?*

#### **Changes north of the river in Thurrock, Havering and Essex**

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

***Strongly oppose***

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

***Strongly oppose***

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

***Strongly oppose***

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

***Strongly oppose***

Q1i. Please let us know the reasons for your response and any other comments you have on the proposed changes north of the river. If you’re providing feedback on specific changes or sections of the route, please refer to these in your response to this question.

*As a parish council located in the countryside south of the Thames; we have limited knowledge of the impacts of the project on those areas affected north of the river. However having seen the manner in*

which the proposals have been developed in the south we cannot help but be sympathetic with those affected.

*In particular we are shocked at the proposal to increase the height of the landforms (spoil heaps) at Tilbury Fields. The absence of habitat survey results and detail on the proposed habitat raises questions about the environmental impact. The proposal to create what amounts to several slag heaps using chalk slurry raises all kinds of issues (ground water pollution, land stability, long term stability, wildlife impacts). There is (again) no engineering documents released in this consultation that describe these 'land forms' (slag heaps), but from the sketch on figure 4-12 of the guide it would appear the average incline of the landforms will be 1:4 (i.e. very steep). The peaks of them will tower around 20m over the surrounding low lying marshes creating the most prominent feature to be visible from the south bank. The brutal imposition of these 'blots on the landscape' raises again the issue of your environmental credentials; in what possible regime can you dress up the conversion of a critical mineral resource into a waste product requiring further land for disposal at the same time as demanding that same resource be quarried elsewhere to support your construction and dress this up as 'Sustainable Construction'? The short sightedness and lack of joined up thinking in the conception of this project is staggering.*

## **2. Improvements for walkers, cyclists and horse riders**

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

### ***Strongly oppose***

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

*We have sought to find out more detail on these changes and been frustrated (again) at the lack of detail. The underlying presumption in your presentations seems to be that creating 'multi- user routes' is an enhancement for NMU's – most do not agree. Walkers do not welcome horse traffic or cyclists on unmade routes (as it creates deep mud) and horse riders do not welcome cyclists, e-bike riders or e-scooters on bridleways because of the potential for them to cause a horse to bolt when appearing from behind. We have asked for details of surfaces to be used, path width's separation arrangements and details of crossings to be told 'they will be included in the DCO'. We cannot therefore support the proposals.*

*We would point out that your opening statement of '3km of new or improved pathways for every 1km of new road.' ignores the fact that you have increased the length of most paths in order to divert them around your works (not to enhance the network). And unless (and until) you can assure us what standards you will be working to, and if the project will be funding these changes (or if they are changes you will instigate and expect others to implement) we will not see this as an enhancement by the project.*

### 3. Nitrogen impact and compensation

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

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

#### **Strongly oppose**

*While not expert in these matters, the Parish Council notes that the proposals are based upon preliminary assessments and that final proposals and the Environmental Impact Assessment (EIA) are not available. We therefore contend you have (again) failed to consult by virtue of failing to provide final data. We would however note that from your initial findings you have identified woodland sites that are very remote from the centre of the project area, including one site (Epping Forest) that is over 20 km from the project. You do not however appear to have included sensitive chalk grass downland sites that are far closer and far more likely to be affected by nitrogen deposition (since the specialist plants that thrive there are dependent on low nitrogen conditions). We question the basis upon which you have arrived at your preliminary assessment; and hope your final assessment will be better formulated.*

*Where are the assessments of PM10, PM2.5, NOX, CO2 and CO pollution for the tunnel and portal areas? Where is the carbon budget for this project?*

*We note that you dismiss mitigation without explanation and prefer instead to propose compensation by requiring more land. The Clean Air policy of 2019 places mitigation (stopping the pollution at source) as your highest priority; and therefore the course of action you should take rather than compensation. As you are aware, compensation should only be engaged in where mitigation is not possible (which you have not demonstrated to be the case). From a simple observers perspective it is obvious that you must mitigate the causes of pollution. From a holistic perspective we observe that the project was justified purely upon the basis of increasing traffic flows rather than seeking to reduce un-necessary traffic – your nitrogen deposition argument must therefore be seen as an argument against the continuation of this project.*

*We also point out the absence of an EIA, within which this assessment should fall. As previously pointed out the PEIR submitted for this project is now radically out of date and no longer reflects the environmental risks that need to be managed. Asking isolated and random questions regarding the environmental impact (in the way you have done) is meaningless in the context of the wider project approval and in no way compensates for failing to provide an EIA.*

*As previously pointed out Highways England (now National Highways) have repeatedly failed to publish traffic modelling data for this project. From our discussions it is clear that the modelling that has taken place does not model the effects on minor roads, under fault conditions or taking into account the proposed developments in the area. The new developments include 9,000 new homes in Gravesham, 2,000 new homes in Maidstone, 15,000 new homes at Ebbsfleet, 33,500 new homes in East London, 25,000 new jobs at Tilbury and 30,000 new jobs at the Swanscombe Peninsula NSIP. Clearly the 2016 data currently being used by National Highways is no longer representative of the environment the tunnel will operate within and the traffic modelling is therefore inadequate. If your modelling of Nitrogen Deposition alone based upon this data is so damning (requiring 250ha of compensation land) an accurate and up to date assessment of the situation would be far worse.*

*National Highways have failed in their duty to mitigate this issue, and by failing to disclose the reasons for dismissing mitigation within this consultation have failed to consult.*

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

***Strongly oppose***

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

*For the reasons previously stated, and because National Highways have failed to issue an Environmental Impact Assessment detailing the issues concerned together with the alternative mitigation strategies we are unable to assess the issues objectively and believe you are acting without justification.*

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

***Strongly oppose***

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

*For the reasons previously stated, and because National Highways have failed to issue an Environmental Impact Assessment detailing the issues concerned together with the alternative mitigation strategies we are unable to assess the issues objectively and believe you are acting without justification.*

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

***Strongly oppose***

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

*For the reasons previously stated, and because National Highways have failed to issue an Environmental Impact Assessment detailing the issues concerned together with the alternative mitigation strategies we are unable to assess the issues objectively and believe you are acting without justification.*

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

***Strongly oppose***

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

*For the reasons previously stated, and because National Highways have failed to issue an Environmental Impact Assessment detailing the issues concerned together with the alternative*

*mitigation strategies we are unable to assess the issues objectively and believe you are acting without justification.*

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

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

***Strongly oppose***

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

*We are very disappointed to see an increase in the order limits again. We feel the increase is unjustified and that it worsens the impact of the project on the greenbelt without producing any benefits for the project.*

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

***Strongly oppose***

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

*We are very disappointed to see an increase in the order limits again. We feel the increase is unjustified and that it worsens the impact of the project on the greenbelt without producing any benefits for the project.*

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

***Strongly oppose***

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

*We are very disappointed to see an increase in the order limits again. We feel the increase is unjustified and that it worsens the impact of the project on the greenbelt without producing any benefits for the project.*

#### **5. Other comments**

*Again we are burdened with the responsibility of having to respond to an extensively wordy poorly framed and deliberately miss-leading glossy brochure from your offices that does not contain the critical information it purports to be communicating.*

*The entire local community is sick of your consultations that change nothing and the duplicitous manner in which you hide and seek to 'dress up' major project failures as some sort of eco success story. You have become nothing more than a marketing department for the unconscionable.*

*Given the cost of this exercise and the paucity of new or fundamentally changed information within these documents; I hope you will all hang your heads in shame at the shambolic failure of this project to deliver on ANY of its original objectives.*

*The complete absence of an updated business case for this project is an obvious omission. It should be front and centre of every consultation; the reason for its absence is painfully clear for those who remember the project initiation (which is probably none of the staff at National Highways). Highways England argued in 2013 that this project would provide a faster, safer, more cost effective increase in road capacity to relieve the Dartford Crossing. The proposed project is now 23 km long, increasing nearly all journey times, using technology that has been suspended on all new motorway projects for safety reasons and its cost has exceeded any of the previously suggested total lifetime benefits. One of the original arguments (relating to the frequent hold ups at Dartford) was that it will provide 'network resilience', but your traffic modelling does not even take into account what will happen when there are delays, and in order to deliver the project you have cut the lane capacity on the east west motorway / A roads down to 2 lanes in each direction – creating local traffic bottlenecks which will only force more traffic onto minor roads.*

*This project will become a financial, environmental and transportation disaster for everyone in its vicinity.*

*For the cost of this one project, 26 QEII bridges could have been built at the finish price. Had the DoT not been swayed by lobbying at that time the current problems at Dartford would not exist. If there are any history books written about this era; this project will be held up as an example of how national infrastructure funding was subverted into local regeneration initiatives to the loss of all concerned.*

## **6. The consultation**

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

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

*We are sick of your overly marketed but underly factual non-statutory consultations which achieve very little. At best they are tangential to the process, at worst they are a complete waste of time.*

*We want to consult on the issues that matter; and we want you to take notice.*