

TGKP RESPONSE TO LOWER THAMES CROSSING DESIGN REFINEMENT CONSULTATION JULY 2020

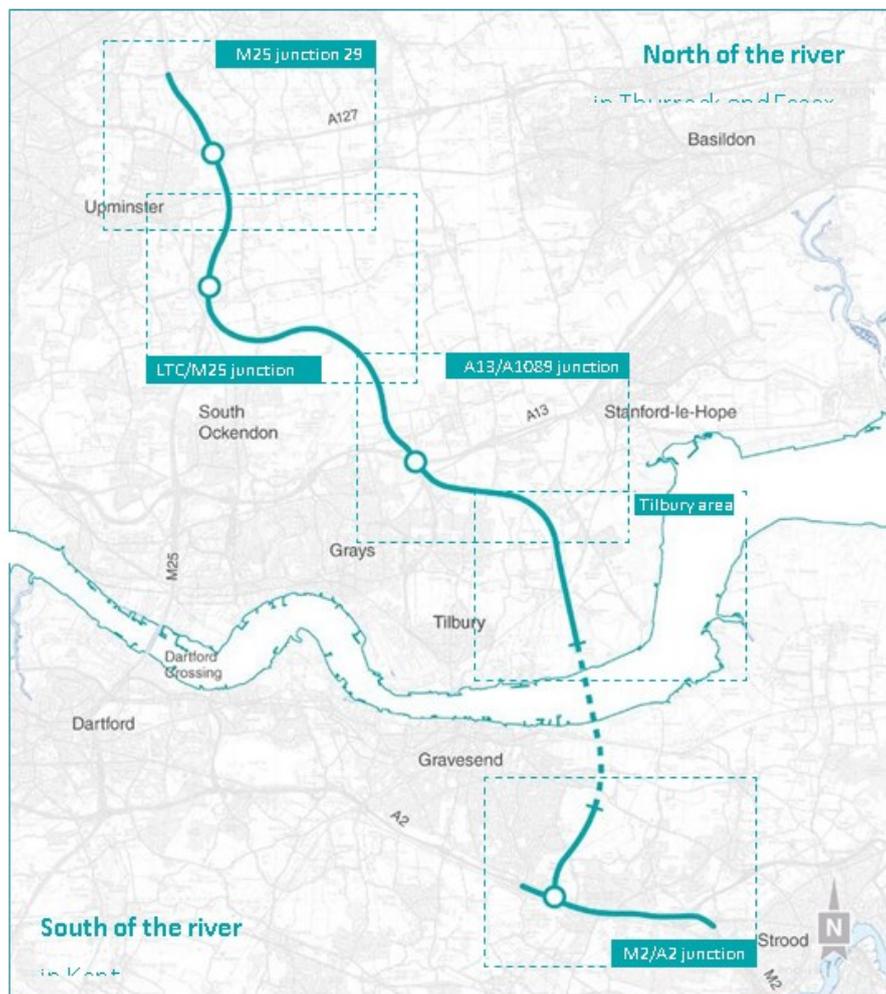
In July 2020 Highways England consulted on further changes to the design of the Lower Thames Crossing. The consultation proposals can be found at <https://highwaysengland.citizenspace.com/ltc/design-consultation/>. This document sets out the consultation questions and TGKP's response.

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.

Neutral

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.

Our main comments on this consultation are set out in response to question 4.

In general, the refinements to the design south of the river are positive. We welcome in particular the reduced encroachment into the Kent Downs AONB, Shorne and Ashenbank Woods SSSI, Jeskyns Community Woodland and Claylane Woods as a result of alterations to the utility diversions. Continued efforts should be made to reduce still further those encroachments.

We share concerns expressed by the Kent & Medway Economic Partnership (KMEP), in their response to this question, about the lack of detailed information (particularly on environmental and archaeological impacts) being shared with local authorities in North Kent, and concur with KMEP about clarifications required.

We are disappointed that Highways England are proposing to reduce the amount of compensatory planting and habitat creation to reflect the reduced encroachment. We suggest that, other than the specific example where the reduction is to maintain a sense of openness around a heritage building, compensation for loss of ancient woodland should go well beyond the minimum necessary to comply with normal regulatory requirements.

We have reservations about the proposed stockpiling of excavated clean chalk. Whilst this would be a temporary use of land and involve materials that should pose no long-term risk to human health or the environment, this would involve continued traffic movements, noise and dust for a significant period (up to three years) beyond the construction phase of the project impacting both upon the local community and the timescale for restoration of the land to appropriate and beneficial after-use. We suggest further efforts should be made to minimise both the quantum and duration of stockpiling including alternative locations further away from residential communities. As KMEP have suggested, the construction of landscaped chalk bunds with topsoil and suitable planting could be an effective alternative in some locations to the fencing proposed to provide noise barriers, and could also make effective use of a proportion of the clean spoil.

We would query the proposed new parking area to the east of Thong Lane green bridge. This does not seem well thought-through in terms of purpose, who it is meant to serve and how it would be managed to prevent abuse (e.g. illegal occupation by travellers or fly-tipping).

Where electricity cables and pylons are being re-routed, we would encourage negotiation with utility providers to place these underground where possible or, for those remaining above ground, to use pylon designs that have a reduced visual impact on the landscape.

The Dartford Crossing operates a pick-up service for cyclists, however, there appears to be no provision to improve the cross-river cycle network as part of the Lower Thames Crossing. A similar service could create a new link between National Cycle Route 177 and 13. In finalising the proposals as they affect non-motorised users it will be important to ensure that the relevant agencies and amenity groups are consulted on this potential opportunity.

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?

Neutral

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.

In respect to the most recent design changes (made by HE since April's LTC consultation), TGKP takes a 'neutral stance'. We would encourage Highway England to work closely with Thurrock Council and Opportunity South Essex (the LEP local board north of the Thames) on the detailed design. We concur, however, with the arguments advanced by KMEP in their response to this question in seeking reconsideration of Highways England's decision to remove the Rest and Service Area and Tilbury Junction that were proposed in the 2018 statutory consultation.

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.

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.

As explained further in our response to question 3, TGKP remains disappointed that the A13/A1089 junction is not an all-movement junction. This impairs the potential of the LTC to fulfil its objectives, particularly the first which is "To support sustainable local development and

regional economic growth in the medium to long term". We encourage Highways England to continue to work with the Local Highway Authorities north of the river to see how best an all-movements junction and connections to the local road network can be created.

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.

Neutral

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.

The design of the M25 junction is vitally important given the volume of freight traffic which travels from the Midlands and the North to the Ports of London Gateway, Dover, and Eurotunnel. The M25 junction must be easy to navigate and able to withstand the expected traffic volumes. However, in respect to the detailed design, TGKP encourages Highways England to continue to work with the Local Highway Authorities and key stakeholders north of the river and defers to their opinion.

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.

Neutral

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.

The local authorities and federated LEP board in this area are best placed to assess the impacts of the proposed junction between the Lower Thames Crossing and the M25. TGKP defers to their opinions.

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?

Neutral

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.

TGKP is grateful that the amount of environmentally sensitive land contained within the development boundary has reduced. The new proposals appear to lessen the impact on Brewers Wood, which contains internationally significant tree species, and ought to be preserved.

However, we would urge Highways England to meet with the County Council and local authority representatives and utility providers specifically to discuss the impact on Shorne Wood County Park. The design proposals show a 60m easement within Shorne Woods Country Park, resulting in the loss of ancient woodland and severance of footpaths, cycleways, and bridleway trails. We ask HE to explore whether this easement could be reduced to the absolute minimum, and compensatory planting within this area for any woodland destroyed.

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

Oppose

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.

We note the intended permanent acquisition of the Southern Valley Golf Club with no intention to replace it. Whilst this is privately owned, we understand it serves as a community asset in offering accessible sport on a non-exclusive basis. We suggest that options for a replacement site should be explored with the owners to retain accessible provision in the local area.

Furthermore, we ask HE to increase its level of engagement with businesses and landowners, both public and private, affected, particularly in relation to the proposed utilities diversions on the CycloPark. It remains unclear within the current proposals whether the existing infrastructure at the CycloPark (such as the main visitor centre) will be negatively impacted during the diversion of utilities. This is an important community facility of more than local significance and it is essential that the implications are thoroughly explored with the relevant stakeholders and any negative impacts properly mitigated.

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?

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.

The consultation lacks detailed information on the environmental impacts. TGKP asks HE to

conduct further dialogue with Gravesham Borough Council, Kent County Council, and other relevant stakeholders on the environmental impacts of the design and provide more information.

4. Other comments

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

As a Partnership, we seek to reflect the sometimes differing views of our partners.

Fundamentally, our support for the Lower Thames Crossing remains strong, but it should be noted that Gravesham Borough Council as one of our partner organisations remains opposed to the siting of the Lower Thames Crossing in its current form and will be responding to the consultation accordingly as is its right. The present proposals, and the wider roads network investment strategy, still fall short of winning consensus support from all partners. Over successive consultations, we as a Partnership and individual Partners have repeatedly raised significant concerns about the project, in terms of detail on the route, design, construction, community and environmental impacts and the interaction with the wider road network. The latest proposals address some of those issues positively, but on the substantive issues where no refinements are being proposed our Partnership remains concerned especially about the socio-economic impacts and legacy of the LTC.

We wholeheartedly agree on the need to alleviate the excessive overloading and congestion at the existing Dartford Crossing, to improve the resilience of the strategic roads network, and to enhance the connectivity between the Channel Ports and the economies of Kent & Medway, London, Eastern England, the Midlands and the North. The LTC is an intervention of national importance, and investment in an effective solution should be treated by Government as a national priority, backed by the full long-term funding commitment necessary to enable Highways England to progress the scheme.

We understand that this supplementary consultation is confined to detailed changes proposed since the technical consultation earlier in 2020. However, we are disappointed that Highways England is not demonstrably responding to criticisms of the scheme as a whole, including those made by this Partnership in response to previous consultations. These include:

- The shortcomings of the LTC Traffic Model which does not adequately take into account projected housing growth and other development in North Kent, including new housing required to meet MHCLG assessments of need. The methodology needs a more flexible approach to schemes that are not yet in adopted plans or the subject of an existing application or consent. This is particularly important in cases where the need to take account of the LTC model has itself affected the timetable for local plan preparation. The present model is demonstrably off-kilter, for instance, in relation to intended developments such as the approved £170m government HIF-funded scheme at Hoo in Medway, unlocking around 10,600 new homes whereas the LTC model recognises only between 200-500. These shortcomings will potentially be compounded as the LTC model is used for other purposes, for example the proposed London Resort which is currently the subject of statutory public consultation. To the extent that Highways England's approach derives from national (Department of Transport) guidance, we strongly urge Highways England to consult with DfT and MHCLG to agree a pragmatic way forward.
- The lack of an all-directions junction between the A13, A1089 and the LTC. Whilst the LTC provides connectivity to the east in Essex, its connectivity to the west and into Tilbury in particular, is decidedly sub-optimal. This reinforces the sense both that sides of the river, and particularly for Gravesham on the Kent side, the areas most directly affected by the LTC in

terms of negative environmental and community impacts stand least to gain from socio-economic benefits that are claimed for the scheme. The loss of community assets in Gravesham and enduring construction-related impacts several years after the LTC becomes operational, reinforce the sense of a negative legacy for this borough whatever benefits may accrue elsewhere.

- The Channel Ports to M25 highways network is of long-term critical importance to the functioning of the UK economy. The scheme approach to the Lower Thames Crossing remains too compartmentalised. It cannot be looked at in isolation but must be dealt with as part of more holistic investment needed to make the strategic and major highways network in Kent & Medway fit for purpose, now and in the future. We call on Highways England and Government to commit to a phased programme of other investments on the A2/M2 and M20 corridors, beyond those already in the pipeline such as M2 Junction 5/A249, including:
 - upgrading Junction 7 of the M2 (Brenley Corner) to permit free-flow traffic on the M2-A2;
 - upgrading the M2 between junctions 4 and 7, widening where possible;
 - dualling or replacing the remaining single-carriageway sections of the A2 north of Dover;
 - continued improvements to A282/M25 Junction to reduce congestion around the existing Dartford Crossing; and, of particular importance,
 - working with strategic and local partners to implement a long-term solution for the A229 Bluebell Hill and its connections to M20 Junction 6 and M2 Junction 3.

A state-of-the-art Lower Thames Crossing should be matched by a fit-for-the-future highways network serving as the spine supporting trade and connectivity between continental Europe and the rest of the UK.

TGKP

12 August 2020